Regulatory and Governmental Affairs



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March 19, 2001

Mr. Dale Hardy Roberts Secretary/Chief Administrative Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, MO 65102-0360 FILED

MAR 1 9 2001

Missouri Public Service Commission

Subject: TO-2001-467 - In the Matter of the State of Competition in the Exchanges of Southwestern Bell Telephone Company

Dear Mr. Roberts:

Enclosed are the original and 8 copies of GTE Midwest Inc. d/b/a Verizon Midwest's Application to Intervene in the above referenced case.

Thank you for your assistance in this matter.

Sincerely,

Thomas R. Parker

TRP:gl Enclosures

c: Service List



MAR 1 9 2001

Missouri Public

## BEFORE THE PUBLIC SERVICE COMMISSION OF MISSOURI

In the Matter of the Investigation of the State Of Competition in the Exchanges of Southwestern Bell Telephone Company. Service Commission Case No. TO-2001-467

## **APPLICATION TO INTERVENE**

GTE Midwest Incorporated d/b/a Verizon Midwest ("Verizon") files this Application to Intervene in the above-referenced docket, pursuant to 4 CSR 240-2.075 and the Order Establishing Case, Direct Notice, Joining Parties, and Granting Protective order dated March 13, 2001.

1. Verizon has an interest in this case because as an incumbent local exchange carrier providing service in franchised territory in which alternative local exchange carriers are also providing service, it is likely to be affected by the results of this proceeding on a precedential basis.

2. Verizon is seeking intervention in this case because its interests are likely to be affected by the results of this proceeding, given that an investigation of the state of competition in its exchanges pursuant to Section 392.245, RSMo 2000, is presumably to be patterned after this case. As a case of first impression, this proceeding will have a substantive effect on future, similar proceedings.

3. At this time, Verizon is unsure of the position it will take in this docket.

4. For the reasons described above, Verizon has an interest in this docket that is different from the interest of the general public and that may be adversely affected by a final order arising from the case.

5. This application to intervene is timely filed.

WHEREFORE, Verizon respectfully requests that the Missouri Public Service Commission grant this Application and allow it to intervene in this docket, and for any other relief to which it is entitled.

Respectfully submitted,

## GTE MIDWEST INCORPORTATED d/b/a Verizon Midwest

BY:

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ITS ATTORNEY

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## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document was

hand-delivered to Dale Hardy Roberts, Secretary/Chief Administrative Law Judge,

Missouri Public Service Commission, 200 Madison Street, Suite 100, Jefferson City,

Missouri and was mailed, postage prepaid this  $\frac{191^{2}}{100}$  day of  $\frac{March}{100}$ , 2001, to the

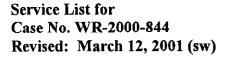
following:

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