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August 17, 1999

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED
AUG 18 1999
Missouri Public
Service Commission

Re: Case No. TO-2000-16

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Application To Intervene.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,


Leo J. Bub

Enclosure

cc: Attorneys of Record

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED
AUG 18 1999
Missouri Public
Service Commission

In the Matter of the Motion to Establish a)	
Docket Investigating the IntraLATA Toll Service)	
Provisioning Practices of Missouri Interexchange)	
Carriers, Public Utility or Common Carrier Duties)	Case No. TO-2000-16
of Interexchange Carriers, Motion to Show Cause,)	
Request for Emergency Hearing, and Alternative)	
Petition for Suspension and Modification.)	

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
APPLICATION TO INTERVENE**

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994 Revised) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding. In support of its application, Southwestern Bell states:

1. Southwestern Bell is a Missouri corporation duly authorized to conduct business in Missouri with its principal Missouri office at One Bell Center, St. Louis, Missouri 63101. Southwestern Bell is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases are defined in §386.020 RSMo (1994).

2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Katherine C. Swaller
Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, Missouri 63101

3. On July 9, 1999, Mid-Missouri Group (MMG) filed a Motion requesting the Missouri Public Service Commission to establish a docket to investigate the toll provisioning practices of interexchange carriers (IXCs), establish common carrier duties of IXCs operating in Missouri, to require AT&T to show cause why it should not be subject to penalties, or, in the alternative, delay the termination of the PTC Plan.

4. On August 10, 1999, the Commission issued an order that, among other things, directed notice of MMG's Motion be given to all telecommunications companies in the State of Missouri and that they be given an opportunity to intervene. Order Directing Notice, Directing Reports, and Requiring Record Collection, Case No. TO-2000-16, issued August 10, 1999, at pp. 6-7.

5. Southwestern Bell seeks to intervene in this proceeding because its interests differ from those of the general public. Southwestern Bell is a PTC and was a party to the Commission's recent investigation of the PTC Plan. Southwestern Bell supports the manner in which the Commission has adopted for winding up the Plan. In its request for relief, however, MMG has proposed as an alternative that the PTC Plan's termination be delayed. Southwestern Bell does not believe that such a proposal is appropriate and opposes it. No other party to this proceeding will adequately protect Southwestern Bell's interest.

6. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise in the areas being investigated and its experience as a telecommunications provider.

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY



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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on August 17, 1999.



Leo J. Bub

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