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September 30, 1998

Mr. Dale Hardy Roberts
Executive Secretary-Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102-0360

RECEIVED
SEP 30 1998
PUBLIC SERVICE COMMISSION

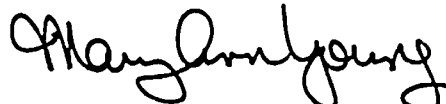
RE: Case No. TA-99-76
Merger of SBC Communications, Inc., and Ameritech Corporation

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the
TELECOMMUNICATIONS RESELLERS ASSOCIATION'S APPLICATION TO
PARTICIPATE WITHOUT INTERVENTION, AND TO SUBMIT COMMENTS for
filing with the Commission in the above-referenced case.

Thank you for your assistance in processing this filing. A copy is being served
on the persons listed below. If there are any questions, please call me at 634-8109.

Sincerely,



Mary Ann (Garr) Young

Enclosure

cc: Michael Dandino, Office of Public Counsel
Cynthia Bryant, General Counsel's Office
Andrew Isar, Harbor Consulting
Paul Lane, Southwestern Bell
James Mauze, Ameritech
Kenneth Schiffman, Sprint

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 30 1993

COMES NOW PUBLIC
SERVICE COMMISSION

In the matter of the Merger of
SBC Communications Inc., and
Ameritech Corporation

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)
)

Case No. TMTA-99-76

TELECOMMUNICATIONS RESELLERS ASSOCIATION'S
APPLICATION TO PARTICIPATE WITHOUT INTERVENTION
AND TO SUBMIT COMMENTS

COMES NOW Telecommunications Resellers Association (TRA) by and through
counsel, and for its Application to Participate without Intervention, pursuant to Section
386.420 RSMo. and 4 CSR 240-2.075(5), and To Submit Comments in this case, and states
as follows:

1. Telecommunications Resellers Association is a national industry association
representing more than 650 telecommunications service providers and their suppliers. Many
TRA members provide a variety of value-added telecommunications services, including local,
interexchange and wireless telecommunications services. Many TRA members are authorized
by this Commission to provide telecommunications services in Missouri as well as in other
SBC Communications, Inc., and Ameritech Corporation states. TRA's members who pay
access charges to Ameritech and SBC Communications companies such as Southwestern Bell
Telephone Company (SWBT) and those who are resellers of Ameritech and SWBT local
exchange and interexchange services are substantially affected by the proposed merger of
SBC Communications, Inc., and Ameritech Corporation.

2. All communications and pleadings in this docket should be served on:

Andrew Isar
Harbor Consulting Group Inc.
4312 92nd Avenue Northwest
Gig Harbor WA 98335

and
Mary Ann (Garr) Young
William D. Steinmeier, P.C.
P. O. Box 104595
Jefferson City, MO 65110-45953

3. TRA's interest in this proceeding is as a group of providers of competitive telecommunications service in Missouri and other states. TRA's members have significant experience in dealing with Ameritech, as well as Southwestern Bell Telephone Company. Thus, the interest of TRA is different from that of the general public.

4. TRA's involvement in this proceeding is to propose considerations that the Commission should undertake in evaluating the SBC/Ameritech merger and in making comments before the FCC. TRA does not seek full intervention, but solely requests status as a participant without intervention pursuant to 4 CSR 240-2.075(5)(B).

5. TRA opposes the SBC/Ameritech merger as not being in the public interest. TRA believes the Commission should review the transaction to determine whether it is detrimental to the public. TRA is filing its Comments concerning the SBC/Ameritech merger transaction herewith as Attachment 1. These Comments serve to comply with Commission Rule 4 CSR 240-2.075(5)(B), which provides that applicants' for participation without intervention should "make a full statement of the position they intend to take in the proceeding" and as TRA's input as to what "should be contained in the Commission's comments to the FCC regarding this merger" (reference the Commission's Order Setting Oral Argument, September 8, 1998). The attached Comments provide the full statement of the position of TRA that the merger should be rejected as not in the public interest, and that in the event the merger does meet the

public interest standard, that pre-requisite conditions should be imposed on the parties to the merger as a conditions precedent to the consummation of the merger.

WHEREFORE, Telecommunications Resellers Association respectfully requests the Missouri Public Service Commission approve this Application for Participation without Intervention, and accept and consider the Comments found in Attachment A.

Respectfully submitted,

WILLIAM D. STEINMEIER, P.C.

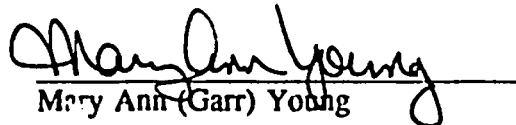


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ATTORNEY FOR TELECOMMUNICATIONS
RESELLERS ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, on this 30th day of September, 1998, to Southwestern Bell Telephone Company, Ameritech, Sprint, the Office of Public Counsel and the General Counsel's office.



Mary Ann (Garr) Young