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September 30, 2002

FILED³
SEP 30 2002
Missouri Public
Service Commission

Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. TW-2003-0063

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies each of WorldCom's Opposition to Intervention of Southwestern Bell Telephone Company. Upon your receipt, please process and return the extra copy of each document filed stamped received to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please contact us. Thank you.

Very truly yours,


Carl J. Lumley

CJL:dn

Enclosures

cc. Office of Public Counsel (W/Enclosure)
General Counsel (W/Enclosure)
SWBT (W/Enclosure)
NuVox (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

FILED³

SEP 3 0 2002

Missouri Public
Service Commission

In the Matter of an Investigation into the Effects)
Of the Bankruptcy of Telecommunications Carriers)
In the State of Missouri)

Case No. TW-2003-0063

**WORLDCOM's OPPOSITION TO INTERVENTION OF
SOUTHWESTERN BELL TELEPHONE COMPANY**

COMES NOW, WorldCom, Inc. ("WCOM") on behalf of itself and its certificated entities who file this opposition to the intervention of Southwestern Bell Telephone Company ("SWBT") and respectfully state the following:

1. WCOM apologizes to the Commission for not filing this Opposition to Intervention of SWBT sooner than it did. WCOM was only recently made aware of SWBT's Application to Intervene because SWBT failed to serve WCOM with a copy of its pleading, contrary to Commission Rule 4 CSR 240-2.075(1). SWBT was or should have been aware of WCOM's involvement in this case, given that the Commission's Order Establishing Case made the WCOM entities parties and given that SWBT's motion is replete with references to WCOM.

2. WCOM opposes the intervention of SWBT because this proceeding was initiated by the Commission in order to "monitor the bankruptcies of telecommunications carriers operating in Missouri." *In the Matter of an Investigation into the Effects of the Bankruptcy of Telecommunications Carriers in the State of Missouri*, Case No. TW-2003-0063 (formerly TW-2003-0053), Order Establishing Case, pg. 2. This proceeding was not established to provide other telecommunications carriers a second forum in order to protect their interests. SWBT's rationale for intervening is that "WorldCom's

bankruptcy filing will significantly impact Southwestern Bell.” Southwestern Bell Telephone Company’s Application to Intervene, pg. 2. WCOM strongly asserts that the bankruptcy court where the WCOM bankruptcy matter is currently pending may address SWBT’s stated concerns. Case Number 02-13533, In re WORLDCOM, INC., *et al.*, United States Bankruptcy Court Southern District Of New York. The bankruptcy court is the proper forum for SWBT to raise its concerns. To the extent SWBT is concerned about being paid for pre-petition debts, the Bankruptcy Court has jurisdiction over those matters. Likewise, if SWBT is concerned about being paid by WCOM for post-petition debts, which SWBT’s Application to Intervene suggests, the Bankruptcy Court has already entered its Section 366 order, which provides carriers such as SWBT with adequate assurance of payment for those obligations. To the extent SWBT seeks relief for any obligations owed by WCOM, the bankruptcy court is the proper forum.

3. The Commission recognized the focused, limited nature of this proceeding in its Order Establishing Case, wherein it stated: “That the Commission’s Staff, or other interested entities, may from time-to-time **advise** the Commission as to any other entities that should be made parties to this case **and should be required to file quarterly status reports** as discussed below.” Order Establishing Case, pg. 3 (emphasis supplied). If SWBT is attempting to intervene in order to keep apprised of the filings in this proceeding, it may do so via the Commission’s EIFS system. SWBT may obtain copies of filings via the internet. It is not necessary to intervene in order to examine the documents filed in this case.

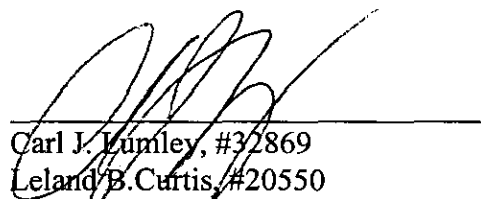
4. Finally, WCOM believes it is bad policy to permit carriers to intervene (other than those carriers identified by the Commission Staff as potential parties to this case)

because to do so would be costly and unnecessary. As a result of intervention, WCOM could potentially be required to serve copies of its quarterly reports on other carriers, as well as other responsive pleadings that would be generated by other parties in the case. This is a costly expense that WCOM should not be required to bear, particularly given the fact that it is currently attempting to reorganize under Chapter 11 of the Bankruptcy Code. As noted above, if SWBT wants to monitor this proceeding, it may do so without intervening in this case. Likewise, if its concerns go beyond monitoring, the proper forum to voice its concerns is before the bankruptcy court.

WHEREFORE, PREMISES CONSIDERED, WCOM prays that the Application to Intervene of SWBT be denied in all respects. Alternatively, if intervention is granted, WCOM prays that such intervention be solely for purposes of monitoring this proceeding and that WCOM not be obligated to serve SWBT with its filings in this case because the parties have access to such filings via the Commission's EFIS system.¹

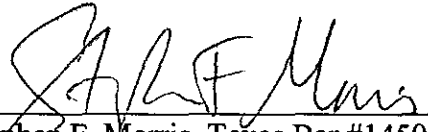
Respectfully submitted,

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¹ WCOM notes that the Commission has permitted limited service in Case No. TR-2001-65, *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service and the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri*.

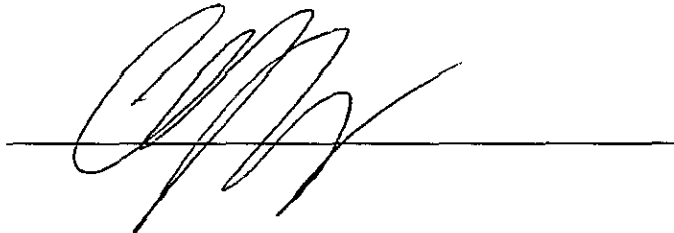


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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was mailed this 30th day of
September, 2002 to the persons listed on the attached list.



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