



Kenneth A. Schiffman  
Attorney

State Regulatory, Central Region  
8140 Ward Parkway, 5E  
Kansas City, MO 64114  
Voice 913 624 6839  
Fax 913 624 5504  
kenneth.schifman@mail.sprint.com

December 3, 1998

FILED

DEC 4 1998

**VIA AIRBORNE EXPRESS**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
301 W. High Street, Suite 530  
Jefferson City, Missouri 65101

Missouri Public  
Service Commission

**Re: Application of Southwestern Bell Telephone Company to  
Provide Notice of Intent to File an Application for Authorization  
to Provide In-Region InterLATA Services Originating in  
Missouri Pursuant to Section 271 of the Telecommunications  
Act of 1996  
Case No. TO-99-227**

Dear Mr. Roberts:

Enclosed for filing, please find the original and fifteen (15) copies of Sprint Communications Company L.P.'s Application for Intervention in the above-styled proceeding.

Please provide a filed-stamped copy to me in the self-addressed stamped envelope. Please call me at 913-624-6839 if you have any questions regarding this matter.

Very truly yours,

Kenneth A. Schiffman

KAS:sjw

Enclosure

cc: Service List  
(w/enclosure)

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

DEC 4 1998

Missouri Public  
Service Commission

Application of Southwestern Bell )  
Telephone Company to Provide )  
Notice of Intent to File an Application ) Case No. TO-99-227  
for Authorization to Provide )  
In-Region InterLATA Services )  
Originating in Missouri Pursuant to )  
Section 271 of the )  
Telecommunications Act of 1996 )

**SPRINT COMMUNICATIONS COMPANY L.P.'S  
APPLICATION FOR INTERVENTION**

Sprint Communications Company L.P. (Sprint) hereby files this Application pursuant to § 386.420 RSMo (1994) and 4 CSR 240-2.075(1)-(4), and respectfully seeks leave to intervene in the above-captioned proceeding. In support of its Application, Sprint states:

1. Sprint is a Delaware limited partnership duly authorized to conduct business in Missouri with its principal office at 8140 Ward Parkway, Kansas City, Missouri 64114.

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

Kenneth A. Schiffman, Esq.  
Sprint Communications Company L.P.  
8140 Ward Parkway, 5E  
Kansas City, Missouri 64114  
Phone: (913) 624-6839  
FAX (913) 624-5504

3. Sprint is an authorized provider of intrastate interexchange telecommunications services in Missouri under certificates granted by this Commission, as well as an authorized provider of interstate interexchange

telecommunications services under a certificate granted by the Federal Communications Commission. In addition, Sprint has been granted a certificate of service authority to provide local exchange telecommunications service in the state of Missouri as a competitive local exchange carrier.

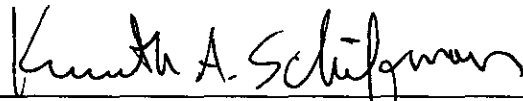
4. Sprint accepts the record in this matter prior to it being granted intervention.

5. Sprint's interest in this proceeding as a telecommunications provider in both competitive interexchange and local exchange markets is different from the interests of the general public. Sprint opposes SWBT's application for interLATA authority in Missouri because SWBT has not complied with Section 271 of the Federal Telecom Act. In addition, granting of this intervention will be in the public interest because Sprint will bring to this proceeding its expertise and experience as a telecommunications provider and its experience in participating in similar 271 proceedings in other states.

WHEREFORE, for the reasons stated above, Sprint respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

Sprint Communications Company L.P.



---

Kenneth A. Schiffman (MO Bar No. 42287)  
8140 Ward Parkway, 5E  
Kansas City, Missouri 64114  
(913) 624-6839  
FAX (913) 624-5504

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by U.S. Mail, this 3rd day of December, 1998, to:

Paul Gardner  
Goller, Gardner & Feather  
131 E. High  
Jefferson City, MO 65101

Stephen Morris  
MCI  
701 Brazos, Ste. 600  
Austin, TX 78701

Craig Johnson  
Andereck, Evans, Milne, et al.  
305 E. McCarty Street  
P.O. Box. 1438  
Jefferson City, MO 65102-1438

Mary Ann Young  
P.O. Box 104595  
Jefferson City, MO 65102

Linda Gardner  
5454 W. 110<sup>th</sup> Street  
Overland Park, KS 66211

Mark Comley  
Newman, Comley & Ruth  
601 Monroe Street, Ste. 301  
Jefferson City, MO 65101

Paul Lane  
SWBT  
100 N. Tucker Blvd., Rm. 630  
St. Louis, MO 63101

Carl J. Lumley  
130 S. Bemiston, Ste. 200  
St. Louis, MO 63105

James C. Stroo  
Tracy Pagilara  
GTE  
601 Monroe Street, Suite 304  
Jefferson City, MO 65101

W.R. England  
312 E. Capital Ave.  
P.O. Box 456  
Jefferson City, MO 65102

Douglas Trabaris  
TCG  
233 S. Wacker Dr., Ste. 2100  
Chicago, IL 60606

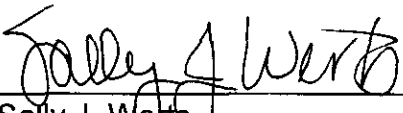
Michael Dandino  
Office of the Public Counsel  
301 W. High Street, Room 250  
P.O. Box 7800  
Jefferson City, MO 65101

Paul DeFord  
Lathrop & Gage  
2345 Grand Boulevard, Ste. 2800  
Kansas City, MO 64108

Thomas C. Pelto  
AT&T  
919 Congress Ave., Ste. 1500  
Austin, TX 78701

Katherine C. Swaller  
SWBT  
One Bell Center, Rm. 3536  
St. Louis, MO 63101

Anthony K. Conroy  
SWBT  
One Bell Center, Rm. 3510  
St. Louis, MO 63101

  
\_\_\_\_\_  
Sally J. Werts