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November 1, 1999

FILED³

NOV 01 1999

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

**Missouri Public
Service Commission**

Re: In the Matter of Proposed Rule, 4 CSR 240-2.075 Interventions
Case No. AX-2000-115

Dear Mr. Roberts:

Enclosed for filing are an original and fourteen (14) copies of an Intervention of Sprint Missouri, Inc. and Sprint Communications Company L.P.

If you have any questions, please do not hesitate to contact me at (913) 345-7915.

Sincerely,

Linda K. Gardner

LKG:ket
Enclosures
cc: All Parties

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In Re: Proposed Rule 4 CSR 240-2.075)
Interventions)

Case No. AX-2000-115

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COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P.
AND SPRINT MISSOURI, INC.

Proposed rule 4 CSR 240-2.075(4)(A) seeks to modify the standard for allowing intervention. Existing rule 4 CSR 240-2.075(4)(A) requires the applicant to demonstrate that it has an interest in the proceeding that is different than that of the general public. The proposed rule modifies this showing to also require the applicant to have an interest "which may be adversely affected by a final order arising from the case." Many cases involving the telecommunications industry begin as a defined issue but become broader and more wide-spread as the case develops. It is often not known when notice is first provided of a case, precisely what issues will be addressed or the reach of the case. Nor is it often known at that stage whether the applicant supports or opposes the relief sought, as recognized by proposed rule 4 CSR 240-2.075(2). Requiring the applicant to show at that early stage that it will be adversely affected may preclude the participation of many parties in cases in which they have an interest, or will have an interest as the case progresses.

Respectfully Submitted,

SPRINT COMMUNICATIONS COMPANY L.P.
SPRINT MISSOURI, INC.

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CERTIFICATE OF SERVICE

I HEREBY certify that copies of the foregoing document were served to the following by first class mail or hand-delivery on this 1st day of November, 1999:

Martha Hogerty
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Dan Joyce
General Counsel
Missouri Public Service Commission
P.O. Box 360
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