

JAMES M. FISCHER, P.C.

ATTORNEY AT LAW  
REGULATORY CONSULTANT

101 WEST McCARTY, SUITE 215  
JEFFERSON CITY, MO 65101

FILED

TELEPHONE (573) 636-6758  
FAX (573) 636-0383

'98 DEC 17 PM 1 03

December 17, 1998

MO PSC  
RECORDS DEPT.

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

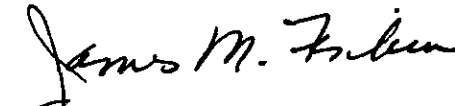
RE: *Southwestern Bell Telephone Company*  
Case No. TO-99-227

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and fourteen (14) copies of the Application to Intervene of Associated Industries of Missouri. A copy of the foregoing Application to Intervene has been hand-delivered or mailed this date to parties of record, including those companies listed on Attachment A.

Thank you for your attention to this matter.

Sincerely,

  
James M. Fischer

/jr  
Enclosures

cc: All Parties of Record

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BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

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MO PSC  
RECORDS DEPT.

In the Matter of the 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

APPLICATION TO INTERVENE

COMES NOW Associated Industries of Missouri ("AIM" or "Applicant") and pursuant to 4 CSR 240-2.075 respectfully requests that the Commission grant the Applicant the right to intervene in this proceeding. In support of this Application, the Applicant states as follows:

1. On November 20, 1998, Southwestern Bell Telephone Company ("SWBT") filed an Application for Authorization to Provide In-region, InterLATA Services Originating in Missouri pursuant to Section 271 of the Federal Telecommunications Act of 1996. SWBT states that it has filed this notice pursuant to the Commission's order in Case No. TO-97-56 to provide 120 days advance notice of its affiliate's intention to file an application with the Federal Communications Commission ("FCC") under Section 271 of the Telecommunications Act of 1996.

2. On December 9, 1998, the Commission issued its Order Granting Interventions, Granting Protective Order, and Establishing Procedural Schedule, establishing December 21, 1998, as the deadline for interested parties to file applications to intervene in this matter.

### IDENTITY OF APPLICANT

3. AIM is an unincorporated association organized and existing under the laws of the State of Missouri with its principal place of business located at 411 Jefferson, P.O. Box 1709, Jefferson City, Missouri 65102. Since 1919, AIM has represented the interests of Missouri employers before the General Assembly, state agencies, the courts, and the public. AIM is dedicated to advancing the business point-of-view relative to issues that effect the cost of doing business in Missouri. Currently, AIM's membership includes approximately 1,500 companies that employ approximately 325,000 employees. The names of AIM's member companies are available to the Commission and other parties upon request. However, due to the voluminous number of companies, AIM requests that the Commission waive the requirement of 4 CSR 240-2.075(3) for purposes of this Application.

4. All correspondence, pleadings, orders and documents in this proceeding should be addressed to:

Mr. Chris Long  
President  
Associated Industries of Missouri  
411 Jefferson Street  
P.O. Box 1709  
Jefferson City, Missouri 65101  
Telephone: (573) 634-2246

Mr. James M. Fischer  
Attorney at Law  
101 West McCarty Street, Suite 215  
Jefferson City, Missouri 65101  
Telephone: (573) 636-6758

**APPLICANT'S INTEREST IN PROCEEDING**

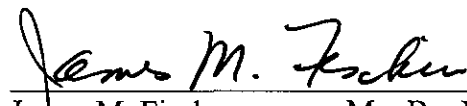
5. Many of AIM's member companies are currently local exchange customers of SWBT in Missouri. In addition, AIM and its member companies are all potential interexchange customers of SWBT or its affiliate, in the event that SWBT or its affiliate were permitted to offer interexchange services throughout the state of Missouri. As such, AIM and its member companies have a direct and pecuniary interest in this proceeding that is different from the general public. AIM seeks to intervene in this proceeding in order to protect its interests as a representative of 1,500 companies located in Missouri.

6. AIM seeks to intervene in order to present its position in favor of policies that encourage the development of full and fair competition in local exchange and interexchange markets in Missouri.

7. AIM's intervention in this matter will serve the public interest by ensuring that the position of large and small business customers is represented in this proceeding.

**WHEREFORE**, Associated Industries of Missouri respectfully requests that the Commission grant it the right to intervene in this matter.

Respectfully submitted,

  
James M. Fischer      Mo. Bar No. 27543  
Attorney at Law  
101 West McCarthy Street, Suite 215  
Jefferson City, Missouri 65101  
Telephone: (573) 636-6758  
Fax: (573) 636-0383

ATTORNEY FOR  
ASSOCIATED INDUSTRIES OF MISSOURI

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 17<sup>th</sup> day of December, 1998 to:

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

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City MO 65102

Paul G. Lane  
Leo J. Bub  
Anthony K. Conroy  
Katherine C. Swaller  
General Counsel--Missouri  
Southwestern Bell Telephone Company  
One Bell Center--Room 3520  
St. Louis, MO 63101-1976

Paul S. DeFord  
Lathrop & Gage  
2345 Grand Blvd.  
Suite 2500  
Kansas City, MO 64108

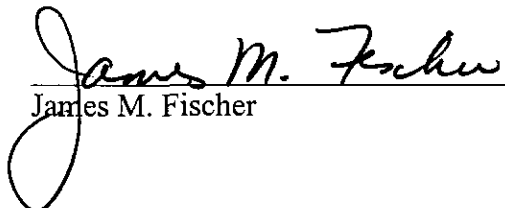
MCI Telecommunications Corporation  
100 South Fourth Street  
St. Louis, MO 63102

Richard S. Brownlee, III  
Hendren and Andrae, L.L.C.  
221 Bolivar Street  
P.O. Box 1069  
Jefferson City, MO 65102

Carl J. Lumley  
Leland B. Curtis  
Curtis, Oetting, Heinz, Garrett & Soule  
130 S. Bemiston, Suite 200  
Clayton, MO 63105

Kenneth A. Schiffman  
Sprint Communications Company L.P.  
8140 Ward Parkway, 5E  
Kansas City, MO 64114

**All the companies listed on Attachment A**

  
James M. Fischer

## Certificated Missouri Competitive Local Exchange Companies

### CLECs:

American Communications Services  
of Kansas City Inc.  
131 Nat'l Business Pkwy.  
Suite 100  
Annapolis Junction, MD 20701

Ameritech Communications  
International  
9525 W. Bryn Mawr, Suite 600  
Rosemont, IL 60018

AT&T Communications of the  
Southwest, Inc.  
101 West McCarty, Suite 216  
Jefferson City, MO 65101

Atlas Communications, Ltd.  
482 Norristown Rd., Suite 200  
Blue Bell, PA 19422

BellSouth BSE, INC.  
2727 Paces Ferry Road  
Atlanta, GA 30339

Birch Telcom of Missouri, Inc.  
1004 Baltimore Ave., Suite 900  
Kansas City, MO 64105

Broadspan Communications, Inc.  
11756 Borman Drive  
Suite 101  
St. Louis, MO 63146

Brooks Fiber Communications of  
Missouri  
One Brooks Center Parkway  
Town & Country, MO 63017

BTI  
4300 Six Forks Rd, Suite 400  
Raleigh, NC 27609

Dial & Save of Missouri, Inc.  
8750 N. Central Expressway,  
Suite 1500  
Dallas, TX 75231

Dial US  
333 Park Central E  
Suite 926  
Springfield, MO 65806

Digital Teleport, Inc.  
11111 Dorsett Road  
St. Louis, MO 63043

Dobson Wireless, Inc.  
13439 N. Broadway Ext.  
Suite 200  
Oklahoma City, OK 73114

Excel Telecommunication Systems,  
Inc.  
8750 N Central Expressway  
Box #6  
Dallas, TX 75231

ExOp of Missouri, Inc.  
402 A East Bannister Road  
Kansas City, MO 64131

EZ Talk Communications, L.L.C.  
4727 South Main  
Stafford, TX 77477

Fast Connections, Inc.  
2200 Ross Ave., Suite 3838  
Dallas, TX 75201

Frontier Telemanagement Inc.  
180 S. Clinton  
Rochester, NY 14646

GE EXCHANGE  
6540 Powers Ferry Road  
Atlanta, GA 30339

Green Hills Communications, Inc.  
7926 NE State Route M  
Breckenridge, MO 64625

Group Long Distance, Inc.  
6455 E. Johns Crossing  
Suite 285  
Duluth, GA 30097

GTE Communications Corporation  
6665 N. MacArthur  
Irving, TX 75039

ICG Telecom Group, Inc.  
161 Inverness Drive West  
Englewood, CO 80112

Intermedia Communications Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619

Kansas City Fiber Network, LP  
1111 Main St., Suite 300  
Kansas City, MO 64105

LCI International Telecom Corp.  
d/b/a Qwest Communications  
Services  
4250 N. Fairfax Drive  
Suite 12W055  
Arlington, VA 22203

LDD, Inc.  
24 South Minnesota  
Cape Girardeau, MO 63701

LDM Systems, Inc.  
254 S. Main St.  
New York, NY 10956

Local Fone Service, Inc.  
624 Six Flags Drive, Suite 214  
Arlington, TX 76011

Local Line America, Inc.  
2680 State Rd.  
Cuyahoga Falls, OH 44223

Mark Twain Communications  
Company  
P.O. Box 128  
Hurdland, MO 63547

MAXCOM, Inc.  
10647 Widmer Road  
Lenexa, KS 66215

Max-Tel Communications, Inc.  
102 W. Franklin  
Alvord, TX 76225

MCIMetro Access Transmission  
Services  
2400 North Glenville Dr.  
Richardson, TX 75082

McLeodUSA Telecommunications  
Services  
6400 C Street SW  
Cedar Rapids, IA 52406

Megsinet-CLEC, Inc.  
225 West Ohio, Suite 200  
Chicago, IL 60610

MFS Intelenet of Missouri, Inc.  
1705 S. Capital of Texas Hwy.  
Suite 100  
Austin, TX 78746

Micomm Services, Inc.  
4001 Mcewen Drive, Suite 200  
Dallas, TX 75244

Microwave Services, Inc.  
3 Bala Plaza East, Suite 502  
Bala Cynwyd, PA 19004

Midwestern Tel  
3809 Castelman Ave.  
Suite 100  
St. Louis, MO 63110

Miller Telephone Co  
209 East Main  
Miller, MO 65707

Missouri Comm South, Inc.  
101 Randol Mill, Suite 108  
Arlington, TX 76011

Navigator Telecommunications,  
LLC  
212 Center St., Suite 1100  
Little Rock, AR 72201

NOW Communications, Inc.  
713 Country Place Drive  
Jackson, MS 39208-6619

Preferred Carrier Services, Inc.  
500 Grapevine Hwy., Suite 300  
Hurst, TX 76054

Omniplex Communications Group  
743 Sprint 40 Park, Suite 250  
Chesterfield, MO 63005

QCC, Inc.  
8829 Bond Street  
Overland Park, KS 66214

Quintelco, INC.  
1 Blue Hill Plaza  
Pearl River, NY 10965

Reconex  
9620 S.W. Barur Blvd., Suite 330  
Portland, OR 97219

REN-TEL Communications, Inc.  
85 Pine Haven Dr.  
Carrollton, GA 30116

Sprint Communications Company  
8140 Ward Parkway-5E  
Kansas City, MO 64114

Suretel, Inc.  
5 North McCormick  
Oklahoma City, OK 73127

TCG St. Louis  
233 S Wacker Drive, Suite 2100  
Chicago, IL 60606

Tel-Link, L.L.C.  
1001 Third Avenue West  
Suite 354  
Bradenton, FL 34205

Tel-Save, Incorporated of  
Pennsylvania  
6805 Route 202  
New Hope, PA 18938

Teligent, Inc.  
8065 Leesburg Pike, Suite 400  
Vienna, VA 22182

The Cube  
1063 Wirt Road, Suite 202  
Houston, TX 77005

Transamerican telephone  
209 E University  
Danton, TX 76201

U.S. Telco, Inc.  
1600 Pacific Avenue #2700  
Dallas, TX 75201-3565

USLD Communications, Inc.  
4250 North Fairfax Drive  
12W002  
Arlington, VA 22203

USN Communications Southwest,  
Inc.  
10 S. Riverside Plaza, Suite 401  
Chicago, IL 60606

Winstar Wireless of Missouri,  
Inc.  
7799 Leesburg Pike, Suite 401 S.  
Tysons Corner, VA 22043

WorldCom Technologies  
1705 S. Capital of Texas Hwy.,  
Suite 100  
Austin, TX 78746

Z-Tel Communications, Inc.  
777 S. Harbour Island Blvd.  
Suite 990  
Tampa, FL 33602



## LOCAL COMPANIES:

ALLTEL Missouri, Inc  
1705 S. Lillian  
PO Box 180  
Bolivar, MO 65613

Alma Telephone Company  
206 S. County Rd  
Alma, MO 64001

Atlas Communications, Ltd.  
482 Norristown Rd., Suite 200  
Blue Bell, PA 19422

Birch Telecom of Missouri, Inc.  
1004 Baltimore Ave., Suite 900  
Kansas City, MO 64105

Bourbeuse Telephone Company  
64 N. Clark  
Sullivan, MO 63080

BPS Telephone Company  
P.O. Box 669  
Malden, MO 63863

Cass County Telephone Company  
P.O. Box 647  
Peculiar, MO 64078

Chariton Valley Telephone  
Corporation  
P.O. Box 407  
Bucklin, MO 64631

Choctaw Telephone Company  
P.O. Box 82  
221 West Main  
Halltown, MO 65664

Citizens Telephone Co. of  
Higginsville, Missouri, Inc.  
1905 Walnut  
P.O. Box 737  
Higginsville, MO 64037

Comcast Telecommunications, Inc.  
d/b/a Comcast Long Distance  
211 South Gulph Road  
King of Prussia, PA 19406

Craw-Kan Telephone Cooperative  
200 N. Ozark  
P.O. box 100  
Girard, KS 66743

Digital Broadcast Network Corp.  
977 Charter Commons  
Chesterfield, MO 63017

Ellington Telephone Company  
P.O. Box 400  
201 College  
Ellington, MO 63638

Farber Telephone Company  
Main & Linn  
Farber, MO 63345

Fidelity Telephone Company  
64 North Clark Ave.  
Sullivan, MO 63080

Goodman Telephone Company, Inc  
P.O. Box 592  
815 Oneida  
Seneca, MO 64865

Granby Telephone Company  
Box 209  
Granby, MO 64844

Grand River Mutual Telephone  
Company  
1001 Kentucky Ave  
Princeton, MO 64673

Green Hills Telephone  
Corporation  
P.O. Box 227  
Breckenridge, MO 64625

Group Long Distance, Inc.  
1451 West Cypress Creek Road,  
Suite 2001  
Fort Lauderdale, FL 33309

GTE Arkansas Incorporated  
601 Monroe Street, Suite 304  
Jefferson City, MO 65101

GTE Midwest Incorporated  
601 Monroe Street, Suite 304  
Jefferson City, MO 65101

Holway Telephone Company  
211 Ash St.  
P.O. Box 112  
Maitland, MO 64466

Iamo Telephone Company  
P.O. Box 368  
104 Crook St.  
Coin, IA 51636

Kingdom Telephone Company  
P.O. Box 97  
211 S. Main  
Auxvasse, MO 65231

KLM Telephone Company  
P.O. Box 30  
Rich Hill, MO 64779

Lathrop Telephone Company  
P.O. Box 167  
Princeton, MO 64673

Le-Ru Telephone Company, Inc.  
P.O. Box 147  
Stella, MO 64867

Mark Twain Rural Telephone  
Company  
P.O. Box 68  
Hurdland, MO 63547

McDonald County Telephone  
Company  
P.O. Box 207  
Pineville, MO 64856

McLeodUSA Telecommunications  
Services  
6400 C Street SW  
Cedar Rapids, IA 52406

Mid-Missouri Telephone Company  
P.O. Box 38  
215 Roe St.  
Pilot Grove, MO 65276

Missouri Comm South, Inc.  
101 Randol Mill, Suite 108  
Arlington, TX 76011

Missouri CSI Corp.  
12835 E Arapahoe Rd., 5th Floor  
Englewood, CO 80112

Mo-Kan Dial Co., Inc.  
Box 429  
112 S. Broadway  
Louisburg, KS 66053

Modern Telecommunications Co.  
718 South West St  
Green City, MO 63545

New Florence Telephone Company  
192 West Broadway  
P.O. Box 526  
Peculiar, MO 64078

New London Telephone Company  
501 S. Main St.  
P.O. Box 369  
New London, MO 63459

Northeast Missouri Rural  
Telephone Company  
Route Three  
718 West Street  
Green City, MO 63545

Ominplex Communications Group  
743 Sprint 40 Park, Suite 250  
Chesterfield, MO 63005

Orchard Farm Telephone Co  
5065 North Highway 94  
St. Charles, MO 63301

Oregon Farmers Mutual Telephone  
Company  
118 East Nodaway  
Box 227  
Oregon, MO 64473

Peace Valley Telephone Company,  
Inc.

P.O. Box 9  
7101 State Hwy W  
Peace Valley, MO 65788

Rock Port Telephone Company  
107 Opp St.  
P.O. Box 147  
Rock Port, MO 64482

Seneca Telephone Company  
P.O. Box 329  
Seneca, MO 64865

Southwestern Bell Telephone  
Company  
General Counsel-Missouri  
One Bell Center, Room 3520  
St. Louis, MO 63101

Sprint  
5454 West 110th St  
Overland Park, KS 66211

Steelville Telephone Exchange,  
Inc  
P.O. Box 370  
Steelville, MO 65565

Stoutland Telephone Company  
Highway T  
P.O. Box 97  
Stoutland, MO 65567

TCG Kansas City, Inc.  
233 S. Wacker Drive, Suite 2100  
Chicago, IL 60606

TDS Engineering, L.L.C.  
229 East Fourth Street  
P.O. Box 297  
Carthage, MO 64836

Teligent, Inc.  
8065 Leesburg Pike, Suite 400  
Vienna, VA 22182

**Missouri Companies With Pending Applications for Authority  
to Provide Competitive Local Exchange Telecommunications  
in Missouri as of December 2, 1998**

ACI Corp.  
7337 S. Revere Parkway  
Englewood, CO 80112

Advanced Communications Group,  
Inc.  
390 Woodsmill Rd. South  
Suite 150  
St. Louis, MO 63017

BarTel Communications, Inc.  
14 Clif-side  
Glendale, MO 63122

Camarato Distributing, Inc.  
900 Camarato Drive  
Herrin, IL 62948

Choctaw Communications, L.C.  
d/b/a Smoke Signal Communica-  
tions  
8400 S. Gessner  
Houston, TX 77074

DIECA Communications, Inc.  
c/o Covad Communications Company  
2330 Central Expressway  
Santa Clara, CA 95050

Gabriel Communications of  
Missouri, Inc.  
16650 Chesterfield Grove Rd.  
Suite 110  
Chesterfield, MO 63005

GTE Communications Corporation  
5221 N. O'Connor Blvd.  
13th Floor  
Irving, TX 75039

JATO Communications Corp.  
5660 Greenwood Plaza Blvd.  
Suite 220  
Englewood, CO 80111

Level 3 Communications, LLC  
1450 Infinite Drive  
Louisville, CO 80027

NET-tel Corporation  
d/b/a NET-tel Communications  
Corporation  
3050 K Street, N.W.  
Suite 250  
Washington, DC 20007

NEXTLINK MISSOURI, INC.  
500 108th Ave. NE, Suite 2200  
Bellevue, WA 98004

The Pager Company  
5321 E. 9th St.  
Kansas City, MO 64124

Simply Local Services, Inc.  
11406 Gravois Road, Suite 100  
St. Louis, MO 63126

Supra Telecommunications and  
Information Systems, Inc.  
2620 S.W. 27th Ave.  
Miami, FL 33133

Transwire Missouri Operations,  
LLC  
8 West 19th Street  
New York, NY 10011

United States Telecommunications  
Inc. d/b/a Tel Com Plus  
13902 N. Dale Mabry, Suite 212  
Tampa, FL 33618

Universal Telephone  
2611 E. Harry  
Wichita, KS 67211