

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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|--|---|-----------------------|
| In the Matter of Southwestern Bell Telephone |) | |
| Company, d/b/a AT&T Missouri's Application |) | |
| for Waiver of the General Distribution |) | Case No. IE-2009-0357 |
| Requirement of White Page Directories Under |) | |
| 4 CSR 240-32.050(4)(B). |) | |

**AT&T MISSOURI'S RESPONSE TO THE CWA'S
LATE-FILED APPLICATION TO INTERVENE**

AT&T Missouri,¹ pursuant to the Missouri Public Service Commission's ("Commission's") May 1, 2009 Order Establishing Time to Respond to Late-Filed Application to Intervene, respectfully states:

AT&T employees represented by the CWA² will not be impacted by AT&T Missouri's proposal to change the method of delivering white page residential directories. These employees are only involved in preparing the residential white page telephone directories for release to the printer. They are not involved in the printing of the book or in its door-to-door delivery. Because AT&T Missouri plans to continue producing white page residential telephone directories, the work performed by CWA members will still need to be performed and will be unaffected by the Commission's grant of the requested waiver.

In this proceeding, AT&T Missouri simply seeks the option to cease the mass distribution of printed residential white page directories to all households and businesses in its service territory without regard to whether customers need or use the books, and instead seeks to provide them only upon request and at no charge. The number of directories printed and delivered does not impact the work the CWA members perform. Accordingly, the CWA would neither have an

¹ Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri."

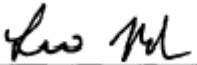
² The Communication Workers of America will be referred to in this pleading as the "CWA."

interest in this proceeding different from that of the general public, nor would the CWA be adversely affected by a final order arising from this case. In addition, there has been no showing that granting CWA intervention here would serve the public interest.

Nevertheless, if the Commission determines that good cause has been shown pursuant to 4 CSR 240-2.075(5) to grant the CWA's late-filed application to intervene, AT&T Missouri would not object to such a determination.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY,
D/B/A AT&T MISSOURI

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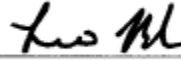
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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on May 6, 2009.



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