

Rebecca B. DeCook Senior Attorney Room 1575 1875 Lawrence Street Denver, CO 80202 303 298-6357

May 9, 2002

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

Re:

<u>Case No. TT-2002-473</u> Tariff File No. 200200828 FILED³

MAY 0 9 2002

Service Commission

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc.'s Application to Intervene in the above referenced docket.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours, Lebecca L. We Cook Gr

Rebecca B. DeCook

Attachment

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter Southwestern Bell Telephone Company's Tariff Filing to Extend Business)	Case No. TT-2002-473
)	
Customer Winback Promotions)	Tariff File No. 200200828

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.'S APPLICATION TO INTERVENE

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and for its Application to Intervene states to the Commission

- 1. AT&T is a competitive local and interexchange telecommunications company duly incorporated and existing under and by virtue of the laws of the State of Delaware, authorized to do business in the State of Missouri as a foreign corporation. AT&T's principal Missouri offices are located at 1100 Walnut, Kansas City, Missouri 64106. AT&T is an authorized provider of local and intrastate interexchange telecommunication services in Missouri under authority granted and tariffs approved by the Commission, as well as an authorized provider of interstate interexchange telecommunications services under a certificate granted and tariffs approved by the Federal Communications Commission.
 - 2. All communications and pleadings in this docket should be directed to:

Rebecca B. DeCook 1875 Lawrence Street, Suite 1575 Denver, CO 80202

J. Steve Weber 101 W. McCarty, Suite 216 Jefferson City, MO 65101

- 3. On or about March 29, 2002, Southwestern Bell Telephone, L.P. d/b/a Southwestern Bell Telephone Company (SWBT) filed a proposed tariff that would extend certain expiring winback promotions. On April 5, 2002, the Commission issued an order suspending the tariff until May 9, 2002 in order to allow the Commission to further consider the tariff. On April 18, 2002, the Commission issued its order further suspending tariff and directing notice and establishing an intervention deadline of May 9, 2002.
- 4. AT&T seeks to intervene in this proceeding because the Commission's decision will affect its interest as a provider of telecommunications services in competition with SWBT in Missouri. AT&T may be adversely affected by a final order arising from the case.
- 5. AT&T's interest as a telecommunications company and a competitor of SWBT are different from those of the general public. Furthermore, AT&T's intervention in this proceeding is in the public interest because of AT&T's interest in enhancing competition and because of AT&T's expertise in the telecommunications industry.
- 6. AT&T opposes SWBT's proposed tariff, which includes unlawful winback discounts that would adversely impair competition and is contrary to the public interest.

WHEREFORE, AT&T Communications of the Southwest, Inc. respectfully requests the Commission to issue an order granting this Application to Intervene

CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing in Docket TT-2002-473 was served upon the parties identified on the following service list on this 9th day of May, 2002 by either hand delivery or placing same in a postage paid envelope and depositing in the U.S. Mail.

Office of Public Counsel PO Box 7800 Jefferson City, MO 65102

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