

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

In the Matter of the Application of Comcast	)	
IP Phone of Missouri, LLC for Certificate of	)	
Service Authority to Provide Local Exchange	)	Case No. LO-2008-0217
and Interexchange Telecommunications	)	
Services Throughout the State of Missouri	)	
And to Classify the Company as Competitive	)	

**AT&T MISSOURI'S  
APPLICATION TO INTERVENE**

AT&T Missouri,<sup>1</sup> pursuant to 4 CSR 240-2.075 and the Missouri Public Service Commission's ("Commission's") January 7, 2008, Notice,<sup>2</sup> respectfully seeks to intervene in this proceeding. In support of its Application, AT&T Missouri states:

1. AT&T Missouri is a Missouri Corporation duly authorized to conduct business in Missouri with its principal Missouri office at One AT&T Center, St. Louis, Missouri 63101. AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases are defined in Section 386.020 RSMo (2000).

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

Timothy P. Leahy  
Leo J. Bub  
Robert J. Gryzmala  
Attorneys for Southwestern Bell Telephone Company,  
d/b/a AT&T Missouri  
One AT&T Center, Room 3518  
St. Louis, Missouri 63101

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

<sup>2</sup> Notice of Applications for Intrastate Certificates of Service Authority and Opportunity to Intervene, issued January 7, 2008, at p.3.

3. In this proceeding, Comcast IP Phone of Missouri, LLC, d/b/a Comcast Digital Voice (“Comcast”) seeks a certificate of service authority to provide local exchange and interexchange telecommunications services in exchanges currently served by AT&T Missouri, Embark, CenturyTel and Spectra. In its Application, Comcast also seeks competitive classification and waivers of various state statutes and Commission rules.<sup>3</sup>

4. AT&T Missouri seeks to intervene here because it has a direct interest in the Commission’s decision on Comcast’s Application and in any determination the Commission may make with respect to Voice over Internet Protocol (“VoIP”) services. Comcast in this certification proceeding has requested authority to provide its service in exchanges served by AT&T Missouri. The Commission’s decisions on Comcast’s Application and requested waivers may adversely affect AT&T Missouri as a competitor in the market. In addition, AT&T Missouri has an interest in offering VoIP service in conjunction with the new video services it is beginning to offer in Missouri in competition with Comcast and other incumbent video service providers. The determinations the Commission makes with respect to VoIP services may adversely affect AT&T Missouri’s ability to provide such services. While AT&T Missouri does not oppose Comcast’s entry into the market as a competitor, AT&T Missouri at this time is unsure of the position it will take with respect to the type of certification Comcast seeks and the specific waivers Comcast requests.

5. AT&T Missouri’s interests in this proceeding, both as a competitor of Comcast and as a potential provider of VoIP, differ from those of the general public. No other party to this proceeding will adequately protect AT&T Missouri’s interest. Granting of this intervention will be in the public interest because AT&T Missouri will bring to this proceeding its expertise and experience as a telecommunications provider.

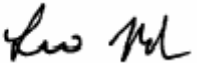
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<sup>3</sup> Comcast Application for Certificate of Service Authority, filed December 31, 2007.

WHEREFORE, AT&T Missouri respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

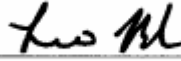
SOUTHWESTERN BELL TELEPHONE COMPANY,  
D/B/A AT&T MISSOURI

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on January 22, 2008.



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