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

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

## APPLICATION TO INTERVENE ON BEHALF OF COMMUNICATIONS WORKERS OF AMERICA

Comes now Communications Workers of America ("CWA"), by and through counsel, and hereby requests to intervene in the above-styled case.

## CWA would show as follows:

- 1. CWA and Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T") are parties to a collective bargaining agreement that covers a bargaining unit of employees' wages, hours, and other terms and conditions of employment. Said bargaining unit of employees perform the work associated with "residential white page telephone directories" which AT&T is requesting this Commission to affect by waiving Rule 4 CSR 240-32.050(4)(B). See AT&T Missouri's Application for Waiver and Motion for Expedited Treatment, Item No. 1.
- 2. CWA is the exclusive representative and collective bargaining agent of the bargaining unit of employees referenced in paragraph 1. CWA's relevant primary place of business is located at: 2600 Via Fortuna, Suite 260, Austin, TX 78746. All correspondence and pleadings should be directed to the undersigned attorneys at their respective addresses.

- CWA has a vested interest, on behalf of its members, in protecting its members' interests and rights to continue to perform this work.
- 4. CWA's members include citizens and consumers of the State of Missouri.

WHEREFORE, PREMISES CONSIDERED, Communications Workers of America respectfully requests the Public Service Commission of the State of Missouri grant this its application to intervene in Case No. IE-2009-0357.

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ATTORNEYS FOR CWA

## CERTIFICATE OF SERVICE

This is to certify service of the above and foregoing instrument was filed utilizing the EFIS Case Filing System and has been forwarded by email to the following on this the 1<sup>st</sup> day of May 2009:

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