

Linda K. Gardner Senior Attorney

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IFIII.JEID) AUG 2 8 1997 PUBLIC SERVICE COMMINICA

August 28, 1997

Mr. Cecil Wright **Executive Secretary** Missouri Public Service Commission 301 West High Street, Suite 530 Jefferson City, MO 65101

Re: In the Matter of the Application of the Mid-Missouri Group and the Small Telephone Company Group of Incumbent Local Exchange Companies for Designation as Telecommunications Company Carriers Eligible for Federal Universal Service Support Case No. TO-98-49

Dear Mr. Wright:

Enclosed for filing with the Missouri Public Service Commission are an original and fourteen (14) copies of the Application to Intervene for United Telephone Company of Missouri d/b/a Sprint and Sprint Communications Company L.P.

If you have any questions, please do not hesitate to contact me at (913) 345-7915.

Sincerely,

Linda K. Gardner Jun Frank

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LKG:ket Enclosures All Counsel of Record (w/ encl.) CC:

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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In the matter of the Application of the Mid-Missouri Group and the Small Telephone Company Group of Incumbent Local Exchange Companies for Designation as Telecommunications Company Carriers Eligible for Federal Universal Service Support Pursuant to Section 254 of the Telecommunications Act of 1996.

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AUG 2 8 1997 PUBLIC SERVICE COMMISSION Case No. TO-98-49

APPLICATION TO INTERVENE

COMES NOW, United Telephone Company of Missouri d/b/a Sprint ("United") and Sprint Communications Company L.P. ("Sprint Long Distance"), collectively referred to as "Sprint," and pursuant to Section 386.420 RSMo and 4 CSR 240-2.110 respectfully seek an Order granting intervention into the above referenced proceeding. In support, Sprint states as follows:

1. United is a Missouri corporation with offices at 319 Madison, Jefferson City, Missouri 65102. United is authorized to transact business within the State of Missouri and is authorized by the Missouri Public Service Commission ("Commission") to provide basic local and interexchange telecommunications service within the state.

2. Sprint Long Distance is a Delaware limited partnership with its principal place of business at 8140 Ward Parkway, Kansas City, MO 64114. Sprint Long Distance is authorized to transact business within the State of Missouri and is authorized by the

Commission to provide interexchange telecommunications service within the state. In addition, Sprint Long Distance has been granted authority to provide local exchange and basic local exchange service in certain exchanges in the state and has an application to provide local exchange service and basic local exchange service in additional exchanges pending.

3. All correspondence, communications and orders in this docket should be directed to:

Mark Harper United Telephone Company of Missouri 5454 W. 110th Street Overland Park, KS 66211 Linda K. Gardner United Telephone Company of Missouri 5454 W. 110th Street Overland Park, KS 66211

Julie Thomas Bowles Sprint Communications Company L.P. 8140 Ward Parkway Kansas City, MO 64114

4. On August 1, 1997, the Mid Missouri Group and the Small Telephone Company Group jointly filed an Application for Designation as Eligible Carriers Pursuant to § 254 of the Telecommunications Act of 1996. In its ORDER AND NOTICE, the Commission set an intervention date of September 8, 1997. As such, Sprint's

APPLICATION TO INTERVE. IE is timely filed.

5. Sprint or Sprint customers will likely be payers into the fund as well as a recipient from the fund or a provider of service to recipients from the fund. As such, Sprint has a direct interest in this matter which is different than that of the general public.

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In addition, Sprint's experience in the telecommunications industry will aid the Commission in examining these issues. Therefore, it is in the public interest to allow Sprint to intervene and to fully participate.

WHEREFORE, Sprint respectfully requests the Commission to issue an Order granting this Application to Intervene of Sprint.

Respectfully submitted,

UNITED TELEPHONE COMPANY OF MISSOURI

ardres by Jean Frank

Linda K. Gardner MoBar #32224 United Telephone Company of Missouri 5454 W. 110th Street Overland Park, KS 66211 Tele. (913) 345-7915 Fax (913) 345-7544

SPRINT COMMUNICATIONS COMPANY L.P.

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Julié Grimaldi MoBar #34458 Julie Thomas Bowles KSBar #16578 Sprint Communications Company L.P. 8140 Ward Parkway Kansas City, MO 64114 Tele. (913) 624-6841 Fax (913) 624-5681





CERTIFICATE OF SERVICE

I HEREBY certify that copies of the foregoing document were served to the following by first class mail or hand-delivery on this 28th day of August, 1997:

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

Sondra B. Morgan Brydon, Swearengen & England P.C. 312 East Capitol Avenue Post Office Box 456 Jefferson City, Missouri 65102 Dan Joyce General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Craig S. Johnson Andereck, Evans, Milne, Peace & Baumhoer 309 East McCarty Street Post Office Box 1438 Jefferson City, Missouri 65102

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