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September 4, 1997

FILED

SEP 05 1997

**MISSOURI
PUBLIC SERVICE COMMISSION**

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Re: Case No. TA-98-49

Dear Mr. Wright:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Application to Intervene.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

A handwritten signature in cursive script that reads "Anthony K. Conroy".

Anthony K. Conroy

Enclosures

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 05 1997

MISSOURI
PUBLIC SERVICE COMMISSION

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.)

Case No. T^QA-98-49

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
APPLICATION TO INTERVENE**

COMES NOW Southwestern Bell Telephone Company ("SWBT") pursuant to §386.420 RSMo (1994) and 4 CSR 240-2.075, and respectfully submits its Application to Intervene in this proceeding. In support of its Application, SWBT states:

1. SWBT is a Missouri corporation duly authorized to conduct business in Missouri with its principal office at One Bell Center, St. Louis, Missouri 63101. SWBT 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 §386.020 RSMo (1994).

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

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Diana J. Harter
Attorneys for Southwestern Bell
Telephone Company
100 N. Tucker, Room 630
St. Louis, Missouri 63101-1976

3. In this proceeding the Mid-Missouri Group and the Small Telephone Company Group (collectively "Applicants") have asked the Missouri Public Service Commission

("Commission") to designate each of their members, all of whom are incumbent local exchange carriers, as telecommunications carriers eligible to receive federal universal service support pursuant to 47 C.F.R. §54.201(d).

4. SWBT seeks to intervene in this proceeding because it has a direct interest in the Commission's decision on whether the applicants are designated "eligible carriers" pursuant to §254 of the Telecommunications Act of 1996. SWBT also has a direct interest in the process which the Commission will utilize to determine carrier eligibility for federal universal service support.

5. SWBT's interests as a telecommunications provider differ from those of the general public. No other party to this proceeding will adequately protect SWBT's interest.

6. Granting of this intervention will be in the public interest because SWBT will bring to this proceeding its expertise and experience as a telecommunications provider.

WHEREFORE, SWBT respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY *Anthony Conroy*
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the Service List by first-class postage prepaid, U.S. Mail on September Y, 1997.

Anthony K. Conroy

Anthony K. Conroy

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