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September 5, 1997

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SEP 0 8 1997

Cecil Wright, Executive Secretary Missouri Public Service Commission Truman State Office Building, 5th Floor 301 West High Street Jefferson City, Missouri 65101-1517

MISSOURI PUBLIC SERVICE COMMISSION

Re: Case No. TO-98-49

Dear Mr. Wright:

Enclosed herewith for filing in the above-referenced case please find an original and fifteen (15) copies of MCI Telecommunications Corporation's and MCImetro Access Transmission Services, Inc.'s Amended Application to Intervene. Please file stamp the extra copy and return in the enclosed self-addressed, postage prepaid envelope to the undersigned for our records.

Very truly your Carl J. Lumley

CJL:dn Enclosures cc. Parties of Record

CARL J. LUMLEY

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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SEP 0 8 1997

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 § 254 of the 1996 Telecommunications Act.

Case No. TO-98-49

MCI TELECOMMUNICATIONS CORPORATION'S AND MCImetro ACCESS TRANSMISSION SERVICES, INC'S AMENDED APPLICATION TO INTERVENE

Come now MCI Telecommunications Corporation (MCI) and MCImetro Access Transmission Services, Inc. (MCImetro) and for their Amended Application to Intervene state to the Commission:

1. MCI is a competitive 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. Its principal Missouri offices are currently located at 100 S. Fourth Street, St. Louis, Missouri 63102. It is an authorized provider of intrastate interexchange telecommunications services in Missouri under certificates granted and tariffs approved by the Commission, as well as an authorized provider of interstate interexchange telecommunications services subject to the jurisdiction of the Federal Communications Commission.

2. MCImetro is a competitive telecommunications company organized and existing under the laws of the State of Delaware, and authorized to conduct business in the State of Missouri. Its principal place of business is 2400 North Glenville Drive, Richardson Texas, 75082. It is an authorized provider of intrastate interexchange and local exchange telecommunications services in 9



Missouri under certificates granted and tariffs approved by the Commission, as well as an authorized provider of interstate interexchange telecommunications services subject to the jurisdiction of the Federal Communications Commission.

3. All communications and pleadings in this docket should be directed to:

Carl J. Lumley Leland B. Curtis Curtis, Oetting, Heinz, Garrett & Soule, P.C. 130 S. Bemiston, Suite 200 St. Louis, Missouri 63105 Stephen F. Morris MCI Telecommunications Corp. 701 Brazos, Suite 600 Austin, Texas 78701

4. On or about August 1, 1997, Mid-Missouri Group (Mid-Mo) and the Small Telephone Company Group (STCG) filed their Application for Designation as Eligible Carriers pursuant to § 254 of the Telecommunications Act of 1996, requesting that the Commission designate, prior to December 31, 1997, each of the members of Mid-Mo and STCG as telecommunications carriers eligible under the provisions of 47 CFR 54.201(d) to receive federal universal service support. MCI and MCImetro neither support nor oppose the Application at this time. Both intervenors seek additional information so as to be able to make a determination as to their position.

4. MCI and MCImetro seek to intervene in the proceeding because the Commission's decision may affect MCI's and MCImetro's interest as purchasers and potential purchasers of access services, as well as MCI's and MCImetro's interest as providers and potential providers of telecommunications interexchange services.

5. MCI's and MCImetro's interests as telecommunications companies are different from those of the general public. Furthermore, MCI's and MCImetro's intervention in this proceeding is





in the public interest because of MCI's and MCImetro's interests in enhancing competition, and

because of their expertise in the telecommunications industry.

WHEREFORE, MCI and MCImetro respectfully request the Commission to issue its order

granting MCI's and MCImetro's Application to Intervene.

Respectfully Submitted,

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P.C.

Carl J. Lumley, #32869 /Leland B. Curtis, #20550 430 S. Bemiston, Suite 200 Clayton, Missouri 63105

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MCI TELECOMMUNICATIONS CORP.

Stephen F) Morris, Texas Bar #14501600 701 Brazos, Suite 600 Austin, Texas 78701 (512) 495-6727 (512) 477-3845 (FAX)

Attorneys for MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc.

CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing was served upon the parties identified in the attached service list on this $\underline{-5}$ day of $\underline{-31}, \underline{4}, \underline{4n}, 19, \underline{19}, 19, \underline{17}, 19$ by placing same in a postage paid envelope and depositing in the U.S. Mail.







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W.R. England, III Sondra B. Morgan Brydon, Swearengen, England, P.C. 312 East Capitol P.O. Box 456 Jefferson City, MO 65102

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Craig S. Johnson Andereck, Evans, Milne, Peace & Baumhoer 305 East McCarty Street P.O. Box 1438 Jefferson City, MO 65102

Office of the Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102