

Diana J. Harter
Attorney
Phone 314 247-6280

Southwestern Bell Telephone
Legal Department
Room 630
100 North Tucker Boulevard
St. Louis, MO 63101-1976
Phone 314 247-2022
Fax 314 247-0881

 Southwestern Bell

March 11, 1997

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

Re: Case No. TA-97-353

Dear Mr. Wright:

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

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

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

Sincerely,


Diana J. Harter

Enclosures

CC: Parties of Record

FILED

MAR 13 1997

MISSOURI
PUBLIC SERVICE COMMISSION

FILED

MAR 13 1997

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

**MISSOURI
PUBLIC SERVICE COMMISSION**

In the Matter of the Application of)
Friendship Village of West Count for)
Certificate of Service Authority to)
Provide Shared Tenant Services Within)
the State of Missouri)

Case No. TA-97-353

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

On February 28, 1997, Friendship Village of West County (Friendship Village) filed an application with the Commission seeking authority to provide shared tenant services (STS) in St. Louis, Missouri without supplying any geographic information about the location to which STS service will be supplied.

Southwestern Bell Telephone Company (SWBT) herein requests an Order permitting intervention in this docket pursuant to 4 CSR 240-2.110 and in support states as follows:

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

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

2. 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).¹ The location of Friendship Village is within SWBT's service area.

3. SWBT's interests as a basic local exchange service provider differ from those of the general public.

4. Granting of this intervention will be in the public interest because Friendship Village has not described the location within which it plans to provide STS nor has it given sufficient information to determine whether the location falls within the statutory definition of "discrete private premises."

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

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By *Diana J. Harter*

PAUL G. LANE	#27011
DIANA J. HARTER	#31424
LEO J. BUB	#34326
ANTHONY K. CONROY	#35199

Attorneys for
Southwestern Bell Telephone Company
100 N. Tucker, Room 630
St. Louis, Missouri 63101-1976
(314) 247-8280

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the attached Service List by first-class postage prepaid, U.S. Mail on March 12, 1996.

Diana J. Harter
Diana J. Harter

¹All statutory cites are to the Missouri Revised Statutes.

MARTHA HOGERTY
OFFICE OF THE PUBLIC COUNSEL
P.O. BOX 7800
JEFFERSON CITY, MO 65102

STEVE DOTTHEIM
ACTING GENERAL COUNSEL
MISSOURI PUBLIC SERVICE COMMISSION
P.O. BOX 360
JEFFERSON CITY, MO 65102

W. BRUCE SPRINER
100 NORTH BROADWAY, SUITE 300
ST. LOUIS, MO 63102