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August 13, 1997

**FILED**

**AUG 15 1997**

**MISSOURI  
PUBLIC SERVICE COMMISSION**

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

Re: Case No. TO-98-21

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, Application to Intervene and an original and fifteen (15) copies of Entry of Appearance on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. Please file stamp the extra copy and return in the enclosed self-addressed, postage prepaid envelope to the undersigned for our records.

Very truly yours,

  
Carl J. Lumley

CJL:dn

Enclosures

cc. General Counsel  
Office of Public Counsel  
Southwestern Bell Telephone  
AllTel  
GTE  
Ameritech

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED

AUG 15 1997

MISSOURI  
PUBLIC SERVICE COMMISSION

Southwestern Bell Telephone Company )  
and Alltel Missouri for Interconnection )  
Agreement between incumbent local )  
exchanges carriers pursuant to order issued )  
in Case No. TC-96-439. )

Case No. TO-98-21

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

Come now MCI Telecommunications Corporation (MCI) and MCImetro Access Transmission Services, Inc. (MCImetro) and for their 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 Missouri under certificates granted and tariffs approved by the Commission, as well as a 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 July 16, 1997, Southwestern Bell Telephone Company (SWBT) filed with the Commission Agreements between SWBT and AllTel, GTE and Ameritech for the provision of Common Channel Signaling and Signaling System 7 (SS7) services, which were filed with the commission pursuant to the Commission Order dated March 18, 1997 in Case No. TC-96-439.

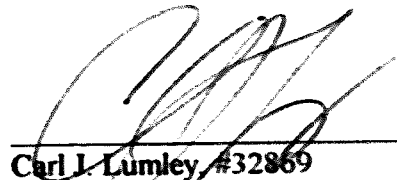
5. MCI and MCImetro seek to intervene in the proceeding because the Commission's decision regarding these Agreements may affect their interests as providers of telecommunications services. MCI was the complainant in Case No. TC-96-439. MCI and MCImetro neither support nor oppose these Agreements at this time.

6. MCI's and MCImetro's interests, as competitive telecommunications companies that provide telecommunications services and require interconnection with other companies such as GTE are different from those of the general public. Furthermore, their intervention in this proceeding is in the public interest because of their interest 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 their Application to Intervene.

**Respectfully Submitted,**

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



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**MCI Telecommunications Corporation**

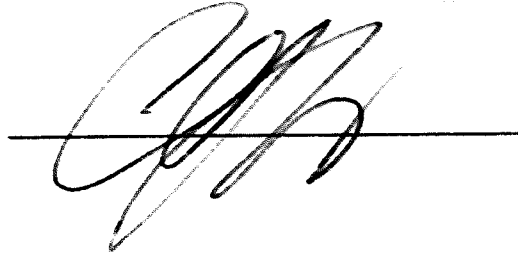


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(512) 495-6727  
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**Attorneys for MCI Telecommunications Corporation  
and MCImetro Access Transmission Services, Inc.**

**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 13 day of August, 1997, by placing same in a postage paid envelope and depositing in the U.S. Mail.

A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes, positioned above a horizontal line.

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