

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE MISSOURI

FILED²
SEP 16 2005

Application of Sprint Nextel Corporation for
Approval of the Transfer of Control of Sprint
Missouri, Inc., Sprint Long Distance, Inc., and
Sprint Payphone Services, Inc. from Sprint Nextel
Corporation to LTD Holding Company

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Case No. IO-2006-0086

Missouri Public
Service Commission

COMMUNICATIONS WORKERS OF AMERICA'S ORIGINAL REQUEST IN
INTERVENTION

NOW COMES Communications Workers of America, ("Intervenor"), and files this Request in Intervention as a party with interest pursuant to the rules as set forth by the Public Service Commission of the State of Missouri ("Commission").

I. Facts

Intervenor is a labor organization as defined in the National Labor Relations Act and doing business in the State of Missouri, with its principal office located at 2600 Via Fortuna, Suite 260, Austin Texas 78746, Travis County, Texas.

II. Intervenor's Position

Intervenor has an interest in this matter because Intervenor and Sprint Nextel Corporation a/k/a Sprint United Telephone ("Sprint Nextel") are signatories to a collective bargaining agreement that includes employment terms and conditions for a unit of employees who are also Intervenor's members. Intervenor is the exclusive bargaining representative for said unit of employees. Any application to transfer control of Sprint Nextel's assets or property would impact Intervenor and its members.

Intervenor's interest in these proceedings is not represented by any existing party. Its participation in these proceedings will contribute to a just result. Granting this Request in

Intervention will not unduly delay these proceedings or unjustly prejudice any existing party.

III. Conclusion

For these reasons, Intervenor requests that the Commission grant it leave to intervene and be made a party to this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that this instrument was served via United States Postal Service, certified mail, return receipt requested, to the below-listed individuals on September 16, 2005, as follows:

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