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August 10, 1999

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED²

AUG 11 1999

**Missouri Public
Service Commission**

Re: Case No. TA-2000-31

Dear Judge Roberts:

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,


Leo J. Bub

Enclosure

cc: Attorneys of Record

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

FILED²

AUG 11 1999

*Missouri Public
Service Commission*

In the matter of the application of Prism Missouri)
Operations, LLC for a Certificate of Service)
Authority to provide interexchange, basic local)
exchange, and non-switched, private line local)
exchange telecommunications services.)

Case No. TA-2000-31

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

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994) and 4 CSR 240-2.075, respectfully seeks to intervene in this proceeding and states:

1. Southwestern Bell is a Missouri corporation duly authorized to conduct business in Missouri with its principal office at One Bell Center, St. Louis, Missouri 63101. Southwestern Bell 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

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

Paul G. Lane
Leo J. Bub
Anthony K. Conroy
Katherine C. Swaller
Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, Missouri 63101

3. In this docket, Prism Missouri Operations, LLC seeks a certificate of service authority to provide interexchange, basic local exchange and non-switched, private line local exchange telecommunications service in the State of Missouri. Prism also seeks classification as a competitive telecommunications company, a lesser degree of regulation and the waiver of certain Commission rules and statutory provisions.

¹ All statutory cites are to the Missouri Revised Statutes.

6

4. Southwestern Bell seeks to intervene in this proceeding because it has a direct interest in the Commission's decision on Prism's Application. Southwestern Bell is authorized to provide local exchange telecommunications services and exchange access services within the State of Missouri. Pursuant to tariffs on file with the Commission, Southwestern Bell is authorized to provide the type of services within the State of Missouri that Prism seeks to provide. Prism's services will be offered in direct competition with Southwestern Bell if this application is granted. At this point, Southwestern Bell does not have sufficient information to either support or oppose Prism's application.

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

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

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

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY



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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on August 10, 1999.



Leo J. Bub

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