

Southwestern Bell Telephone One Bell Center Room 3516 St. Louis, Missouri 63101 Phone 314 235-6060 Fax 314 247-0014 Email ac7526@momail.sbc.com

FILED²

OCT 2 5 1999

Service Commission



October 22, 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

Re: Case No. TA-2000-245

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the abovereferenced 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 selfaddressed, stamped envelope.

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

Very truly yours,

Anthony K. Conroy

Chitrany Klony.

Enclosure

cc:

Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

FILED
OCT 2 5 1990
Service Ouri Pur

In the matter of the application of Convergent Communications Services, Inc., for a certificate of service authority to provide Basic Local Telecommunications Services in Portions of the State of Missouri and to Classify Such Services)	Service Commission Case No. TA-2000-245	On
State of Missouri and to Classify Such Services and the Company as Competitive.)		

SOUTHWESTERN BELL TELEPHONE COMPANY'S APPLICATION TO INTERVENE

COMES NOW Southwestern Bell Telephone Company (SWBT) and respectfully submits its Application to Intervene in this proceeding pursuant to 4 CSR 240-2.060 and 2.075. In support of its Application, SWBT states:

- 1. SWBT is a Missouri corporation duly authorized to conduct business in Missouri with its principal Missouri office at One Bell Center, St. Louis, Missouri 63101. SWBT is a "local exchange telecommunications company" and a "public utility" and is authorized to provide "telecommunications service" within the state of Missouri as each of those phrases are defined in §386.020 RSMo (1994).
- 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 3516
St. Louis, Missouri 63101

3. In this proceeding, Convergent Communications Services, Inc. (CCSI) seeks a certificate of service authority to provide basic local telecommunications service in all exchanges currently served by SWBT, GTE Midwest, Inc. and United Telephone Company of Missouri d/b/a Sprint. CCSI seeks classification as a competitive company and to receive a lesser degree of regulation as permitted under Sections 392.361 and 392.420 RSMo. (1994) and the waiver of various statutory provisions and Commission rules.

- 4. The services which CCSI seeks Commission authority to provide will be offered in direct competition with SWBT if CCSI's Application in this proceeding is granted. SWBT therefore has a direct interest in the Commission's decision on CCSI's Application. At this point, SWBT does not have sufficient information to either support or oppose CCSI's Application.
- 5. SWBT's interests as a provider of basic local exchange service differ from those of the general public. No other party to this proceeding will adequately protect SWBT's interest.
- 6. Granting SWBT's Application to Intervene is in the public interest because SWBT will bring to this proceeding its extensive expertise and experience as a telecommunications provider.

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

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By

PAUL G. LANE

LEO J. BUB ANTHONY K. CONROY KATHERINE C. SWALLER

#35199 #34271

#27011

#34326

Attorneys for Southwestern Bell Telephone Company

One Bell Center, Room 3516 St. Louis, Missouri 63101

(314) 235-6060 (Telephone)

(314) 247-0014 (Facsimile)

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 October 22, 1999.

Anthony K. Conroy

DAN JOYCE MISSOURI PUBLIC SERVICE COMMISSION 301 W. HIGH STREET, SUITE 530 JEFFERSON CITY, MO 65101

MICHAEL F. DANDINO OFFICE OF THE PUBLIC COUNSEL 301 W. HIGH STREET, SUITE 250 JEFFERSON CITY, MO 65101

JUDITH A. RAU RAU & RAU 1007 OLIVE STREET, 5TH FLOOR ST. LOUIS, MO 63101

LANCE J.M. STEINHART 6455 E. JOHNS CROSSING, SUITE 285 DULUTH, GEORGIA 30097