

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P. C.
ATTORNEYS AT LAW

130 SOUTH BEMISTON, SUITE 200
ST. LOUIS, MISSOURI 63105

(314) 725-8788

FACSIMILE (314) 725-8789

www.cohgs.com

CARL J. LUMLEY

EMAIL ADDRESSES

clumley@cohgs.com

MCI MAIL: (CLUMLEY / MCI ID: 505-3023)

0005053023@MCIEMAIL.COM

November 8, 1999

Dale Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, 5th Floor
301 West High Street
Jefferson City, Missouri 65101-1517

FILED²
NOV 09 1999
Missouri Public
Service Commission

Re: Case No. TA-2000-260

Dear Mr. Roberts:

Enclosed please find for filing with the Commission an original and fifteen copies of MCImetro Access Transmission Services, LLC's, Brooks Fiber Communications of Missouri, Inc.'s and MCI WorldCom Communications, Inc.'s Application to Intervene. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please do not hesitate to contact us.

Very truly yours,


Carl J. Lumley

CJL:dn

Enclosures

cc. Parties of Records (W/Enclosures)

FILED²

NOV 09 1999

Missouri Public
Service Commission

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the matter of SBC Advanced Solutions, Inc.'s)
Application for Certificate of Service Authority)
to Provide Non-switched Local Exchange)
Telecommunications Services in the State of)
Missouri.)

Case No. TA-2000-260

MCIMETRO ACCESS TRANSMISSION SERVICES, LLC'S,
BROOKS FIBER COMMUNICATIONS OF MISSOURI, INC.'S AND
MCI WORLDCOM COMMUNICATIONS, INC.'S
APPLICATION TO INTERVENE

Come now MCImetro Access Transmission Services, LLC (MCImetro), Brooks Fiber Communications of Missouri, Inc. (Brooks), and MCI WorldCom Communications, Inc. (MCIWC) and for their Application to Intervene state to the Commission:

1. MCImetro is a Delaware limited liability company in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCImetro is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

2. Brooks is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. Brooks is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

3. MCIWC is a Delaware corporation in good standing formerly known as WorldCom Technologies, Inc., and is authorized to conduct business in Missouri with regulatory offices at 701 Brazos, Suite 600, Austin, Texas 78701. MCIWC is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

4. All communications and pleadings in this case should be directed to:

Carl J. Lumley
Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule, PC
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
314-725-8788
314-725-8789 (FAX)

Stephen F. Morris
MCI WorldCom
701 Brazos, Suite 600
Austin, Texas 78701
(512) 495-6721
(512) 477-3845 (FAX)

5. On or about September 30, 1999, SBC Advanced Solutions, Inc. (SBC) filed its Application for Certificate of Service Authority to Provide Non-Switched Local Exchange Telecommunications Services in the State of Missouri and Classification as a Competitive Company. On or about October 19, 1999, the Commission issued its Order and Notice setting an intervention deadline of October 27, 1999. MCImetro, Brooks, and MCIWC seek leave to late-file this intervention. They were unaware of the deadline due to personnel absence. There is good cause to grant this late application to allow a full exploration of the issues raised by this very unique application, by which the SBC companies seek to implement the conditions of the FCC's order approving the SBC/Ameritech merger.

6. MCImetro, Brooks and MCIWC seek to intervene in this proceeding because the Commission's decision may adversely affect MCImetro's, Brooks', and MCIWC's interests as providers of telecommunications services, including as CLECs. MCImetro, Brooks, and MCIWC

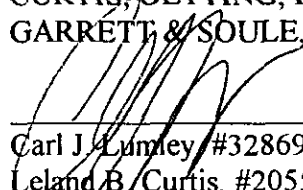
neither support nor oppose SBC's application at this time, as they have not been provided sufficient information yet.

7. MCImetro's, Brooks', and MCIWC's interest as telecommunications companies are different from those of the general public. Furthermore, MCImetro's, Brooks', and MCIWC's intervention in this proceeding is in the public interest because of MCImetro's, Brook's, and MCIWC's interests in enhancing competition and because of their expertise in the telecommunications industry.

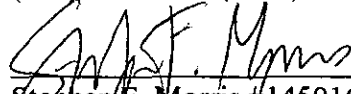
WHEREFORE, MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc., and MCI WorldCom Communications, Inc., respectfully request the Commission to issue its order granting this Application to Intervene.

Respectfully submitted,

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



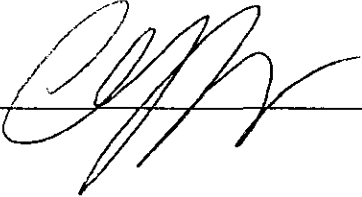
Carl J. Lumley #32869
Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)



Stephen F. Morris #14501600
MCI WorldCom
701 Brazos, Suite 600
Austin, Texas 78701
(512) 495-6721
(512) 477-3845 (FAX)
Attorneys for
MCImetro Access Transmission Services LLC,
Brooks Fiber Communications of Missouri, Inc., and
MCI WorldCom Communications, Inc.

Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 8th day of November, 1999, by placing same in the U.S. Mail, postage paid.



A handwritten signature in black ink, appearing to be 'C. J. R.', is written over a horizontal line.

Office of Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Jim Fischer
101 West McCarty, Suite 215
Jefferson City, Missouri 65101