BEFORE THE PUBLIC SERVICE COMMISSION

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In the matter of the application of Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance for a Certificate of Service Authority to provide Interexchange Telecommunications Services within the State of Missouri.

Case No. TA-99-47

MCI TELECOMMUNICATIONS CORPORATION'S APPLICATION TO INTERVENE

Comes now MCI Telecommunications Corporation (MCI) and for its Application to Intervene states 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 under a certificate granted and tariffs approved by the Federal Communications Commission.

2. 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

3. On or about August 4, 1998, Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance (SBC), filed with the Commission an application for certificate of service authority to provide interexchange telecommunications services within the State of Missouri. On August 11, 1998, the Commission issued a Notice setting an intervention deadline of August 26, 1998.

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4. MCI seeks to intervene in the proceeding because the Commission's decision regarding this application may affect MCI's interests as a purchaser of access services, as well as MCI's interests as a provider of intrastate long distance services. MCI opposes SWBT's application because SWBT has not yet been authorized to provide in region interLATA services by the FCC pursuant to Section 271 of the 1996 Telecommunications Act, and thus SWBT's application is premature.

5. MCI's interests, as a competitive interexchange telecommunications company that purchases access service and provides long distance service, are different from those of the general public. Furthermore, MCI's intervention in this proceeding is in the public interest because of MCI's interest in enhancing competition, and because of its expertise in the telecommunications industry.

WHEREFORE, MCI respectfully requests the Commission to issue its order granting MCI's Application to Intervene.

Respectfully Submitted,

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

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



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MCI TELECOMMUNICATIONS CORP.

SFYLL Lun 13C Stephen F. Morris, Texas Bar #14501600

Stephen F. Morris, Texas Bar #14501600 701 Brazos, Suite 600 Austin, Texas 78701 (512) 495-6727 (512) 477-3845 (FAX)

Attorneys for MCI Telecommunications Corporation

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 2c hday of 14, 19, 19, 19, by placing same in a postage paid envelope and depositing in the U.S. Mail.

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

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General Counsel's Office P.O. Box 360 Jefferson City, Missouri 65102

Southwestern Bell Communication Services, Inc. d/b/a Southwestern Bell Long Distance 5850 West Las Positas Boulevard Pleasanton, California 94588

James M. Fischer 101 West McCarty Street, Suite 214 Jefferson City, Missouri 65101