

2345 GRAND BOULEVARD SUITE 2500 KANSAS CITY, MISSOURI 64108-2684 816-292-2000, FAX 816-292-2001

August 26, 1998

1050/40 CORPORATE WOODS 9401 INDIAN CREEK PARKWAY OVERLAND PARK, KANSAS 66210-2007 816-292-2000, Fax 913-451-0875

FILED

AUG 2 6 1998

Missouri Public Service Commission

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65101

Re: Case Number TA-99-47

Dear Judge Roberts:

Attached for filing with the Commission is the original and fifteen (15) copies of AT&T Communications of the Southwest, Inc.'s Application to Intervene and Entry of Appearance for Paul S. DeFord and Kevin K. Zarling in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

LATHROP & GAGE, L.C.

le Foidije, Paul S. DeFord

Attachments

Cc: General Counsel Office of Public Counsel James M. Fischer, Attorney at Law

STATE OF MISSOURI PUBLIC SERVICE COMMISSION

AUG 2 6 1998 Missouri Public Service Commission

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 Service) Within the State of Missouri.)

Case No. TA-99-47

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.'S APPLICATION TO INTERVENE

COMES NOW AT&T Communications of the Southwest, Inc. (AT&T) and for its Application to Intervene states as follows:

1. AT&T 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. AT&T's principal Missouri offices are located at 1100 Walnut, Kansas City, Missouri 64106. AT&T is an authorized provider of intrastate interexchange telecommunications services in Missouri under authority 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. AT&T has also been granted authority to provide local exchange service and basic local exchange service in portions of Missouri.

 All communications and pleadings in this docket should be directed to:

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Paul S. DeFord Lathrop & Gage L.C. 2345 Grand Boulevard Kansas City, MO 64108

Kevin Zarling AT&T Communications of the Southwest, Inc. 919 Congress, Ste. 1500 Austin, TX 78701

3. By Notice of Applications issued August 11, 1998, the Commission established August 26, 1998 as the deadline for filing applications to intervene in this proceeding.

4. AT&T's interest, as a competitive interexchange and local exchange telecommunications company in Missouri, are different from those of the general public. Further, AT&T's intervention in this proceeding is in the public interest because of AT&T's interest in enhancing competition and because of its expertise in the telecommunications industry.

5. It is AT&T's position that any grant of authority to applicant should be conditioned upon compliance with Section 271 of the 1996 Federal Telecommunications Act as well as Missouri specific separate subsidiary/affiliate transaction requirements.

WHEREORE, AT&T respectfully requests the Commission to enter its Order granting AT&T's Application to Intervene.

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Respectfully submitted,

LATHROP & GAGE L.C. oral au <u>____</u>) #2,**9**509

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(512)370-2010 FAX: (512)370-2096

Attorneys for AT&T Communications of the Southwest, Inc.

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I hereby certify that a copy of the above and foregoing was served upon the following persons by depositing a true copy thereof in the United States mail, postage prepaid, this 26th day of August, 1998.

James M. Fischer Attorney at Law 101 West McCarty Street, Suite 215 Jefferson City, MO 65101

Michael Dandino Office of Public Counsel Truman State Office Building 301 W. High Street, Suite 250 Jefferson City, MO 65101

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Dana K. Joyce General Counsel MO Public Service Commission P. O. Box 7800 Jefferson City, MO 65101

Foed ye,

AN ATTORNEY FOR AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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

ENTRY OF APPEARANCE

COMES NOW Paul S. DeFord pursuant to 4CSR 240-2.040 and enters his appearance on behalf of AT&T Communications of the Southwest, Inc. in the aboveentitled proceeding. The undersigned, Paul S. DeFord is a member in good standing of the Bar of Missouri and is admitted to practice before the Trial and Appellate Courts in that jurisdiction. Neither the undersigned nor any member of the Lathrop & Gage law firm, having office within the State of Missouri, is disqualified to appear in any court.

Respectfully submitted,

dije

 Paul S. DeFord
 #29509
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 2345 Grand Boulevard

 Kansas City, Missouri 64108-2684
 (816) 292-2000 FAX (816-292-2001)

ATTORNEY FOR AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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

ENTRY OF APPEARANCE

COMES NOW Kevin K. Zarling pursuant to 4CSR 240-2.040 and enters his appearance on behalf of AT&T Communications of the Southwest, Inc. in the aboveentitled proceeding. The undersigned, Kevin K. Zarling, is a member in good standing of the Bar of Texas and is admitted to practice before the Trial and Appellate Courts in that jurisdiction. Neither the undersigned nor any member of the AT&T Austin Legal Department is disqualified to appear in any court.

Paul DeFord of Lathrop & Gage, L.C., a member of the Missouri Bar, having offices within the State of Missouri, is hereby designated associate counsel in this case.

Respectfully submitted,

Kevin Zarling

Kevin Zarling Texas#22249300 7 919 Congress, Ste. 1500 Austin, Texas 78701 (512) 370-2010 FAX: (512)-370-2096

ATTORNEY FOR AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.