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January 7, 2000

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-2000-372

JAN 1 0 2000

Service Commission

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,

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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COMMISSION OURI	JAN 1 0 2000
Case No. TA-2000-372	Missouri Public Commission

In the matter of the Application of Snappy Phone)
of Texas, Inc. d/b/a Snappy Phone for a Certificate)
or Authority to provide Basic Local and)
Interexchange Telecommunications Services within)
the State of Missouri.)

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
Mimi B. MacDonald
Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3514
St. Louis, Missouri 63101

3. In this proceeding, Snappy Phone of Texas, Inc. d/b/a Snappy Phone seeks a certificate of service authority to provide basic local exchange and interexchange telecommunications services in exchanges currently served by SWBT. Snappy Phone 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 Snappy Phone seeks Commission authority to provide will be offered in direct competition with SWBT if Snappy Phone's Application in this proceeding is granted. SWBT therefore has a direct interest in the Commission's decision on Snappy Phone's Application. At this point, SWBT does not have sufficient information to either support or oppose Snappy Phone'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

PAUL G. LANE #27011 LEO J. BUB #34326 ANTHONY K. CONROY #35199 MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone Company

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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 January 174, 2000.

Mini B. MacDonald

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

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