Leo J. Bub Senior Counsel



Southwestern Bell Telephone One Bell Center Room 3518 St. Louis, Missouri 63101 Phone 314 235-2508 Fax 314 247-0014

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(Southwestern Bell

May 26, 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

FILED² MAY 3 0 2000 Missouri Public Service Commission

Re: Case No. TA-2000-732

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight 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,

Leo J. Bub

Enclosure

Attorneys of Record cc:

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

MAY 3 0 2000

FILED²

In the matter of the application of U.S. TelePacific) Corp. d/b/a TelePacific Communications for a) certificate of service authority to provide resold) and facilities-based Basic Local Exchange) Telecommunications Services in Portions of the) State of Missouri and to Classify Such Services and) the Company as Competitive.)

Missouri Public Service Commission Case No. TA-2000-732

SOUTHWESTERN BELL TELEPHONE COMPANY'S APPLICATION TO INTERVENE

Southwestern Bell Telephone Company, pursuant to §386.420 RSMo (1994) and 4 CSR

240-2.075, respectfully seeks to intervene in this proceeding and states:

1. Southwestern Bell is a Missouri corporation duly authorized to conduct business

in Missouri with its principal Missouri office at One Bell Center, St. Louis, Missouri 63101.

Southwestern Bell is a "local exchange telecommunications company" and a "public utility," and

is duly authorized to provide "telecommunications service" within the State of Missouri as each

of those phrases are defined in §386.020 RSMo (1994).¹

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 3518 St. Louis, Missouri 63101

3. In this proceeding, U.S. TelePacific Corp. d/b/a TelePacific Communications seeks a certificate of service authority to provide basic local exchange telecommunications services in exchanges currently served by GTE Midwest Incorporated, United Telephone Company of Missouri d/b/a/ Sprint and Southwestern Bell. TelePacific seeks classification as a competitive company and to receive a lesser degree of regulation as permitted under Sections

¹ All statutory cites are to the Missouri Revised Statutes.

7

392.361 and 392.420 RSMo. (1994) and the waiver of various statutory provisions and Commission rules.

5

4. Southwestern Bell seeks to intervene in this proceeding because it has a direct interest in the Commission's decision on TelePacific's Application. Southwestern Bell is authorized to provide basic local and local exchange telecommunications services within the State of Missouri. Pursuant to tariffs on file with the Commission, Southwestern Bell is authorized to provide the type of services within the State of Missouri that TelePacific seeks to provide. TelePacific in this certification proceeding has requested service authority in exchanges served by Southwestern Bell, GTE and Sprint. In order to protect its interests, Southwestern Bell believes it necessary for it to participate in the Commission's review of TelePacific's initial request for certification.

5. Southwestern Bell's interests as a local exchange telecommunications service provider differ from those of the general public. No other party to this proceeding will adequately protect Southwestern Bell's interest.

6. Granting of this intervention will be in the public interest because Southwestern Bell will bring to this proceeding its expertise and experience as a telecommunications provider.

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

BY

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

PAUL G. LÁNE#27011LEO J. BUB#34326ANTHONY K. CONROY#35199MIMI B. MACDONALD#37606Attorneys for Southwestern Bell Telephone CompanyOne Bell Center, Room 3518St. Louis, Missouri 63101314-235-2508 (Telephone)/314-247-0014 (Facsimile)lb7809@momail.SBC.com

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on May 26, 2000.

In M

Leo J. Bub

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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7

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