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August 30, 1999

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

AUG 31 1999

Missouri Public
Service Commission

Re: Case No. TA-2000-141

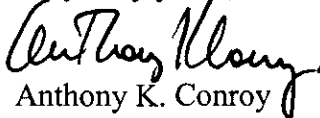
Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and fourteen 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,


Anthony K. Conroy

Enclosures

cc: Attorneys of Record

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED²
AUG 31 1999

In the Matter of the Application of JATO Operating)
Corp. for a Certificate of Authority to provide)
Basic Local and Interexchange Telecommunications))
Services within the State of Missouri.)

Case No. TA-2000-141

Missouri Public
Service Commission

**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
Katherine C. Swaller
Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3516
St. Louis, Missouri 63101

3. In this proceeding, JATO Operating Corp (JATO Operating) seeks a certificate of service authority to provide basic local exchange and interexchange telecommunications services in exchanges currently served by SWBT. JATO Operating 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 JATO Operating seeks Commission authority to provide will be offered in direct competition with SWBT if JATO Operating's Application in this proceeding

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is granted. SWBT therefore has a direct interest in the Commission's decision on JATO Operating's Application. At this point, SWBT does not have sufficient information to either support or oppose JATO Operating'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

By 

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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 August 30, 1999.


Anthony K. Conroy

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