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September 1, 1998

FILED
SEP 1 1998
Missouri Public
Service Commission

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

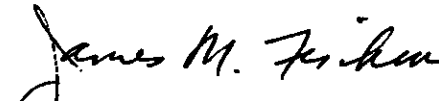
RE: *Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance*; Case No. TA-99-47

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of Southwestern Bell Long Distance's Response to Applications to Intervene or Participation Without Intervention for filing in the above-referenced matter. A copy of the foregoing Response has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
SEP 1 1998
Missouri Public
Service Commission

In the matter of the application of)
Southwestern Bell Communications Services,)
Inc., d/b/a Southwestern Bell Long Distance) Case No. TA-99-47
for a Certificate of Service Authority to)
provide Interexchange Telecommunications)
Services within the State of Missouri.)

**SOUTHWESTERN BELL LONG DISTANCE'S
RESPONSE TO APPLICATIONS TO INTERVENE
OR PARTICIPATION WITHOUT INTERVENTION**

Comes now Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance ("SBLD"), and in response to the Applications to Intervene filed in this proceeding by the Mid-Missouri Group ("MMG"), MCI Telecommunications Corporation ("MCI"), Sprint Communications Company, L.P. ("Sprint"), CompTel-Mo ("CompTel"), McLeodUSA Telecom Services, Inc. ("McLeod"), AT&T Communications of the Southwest, Inc. ("AT&T"), and Digital Teleport, Inc. ("Digital"), and the Applications to Participate Without Intervention filed by the Small Telephone Company Group ("STCG") and Fidelity Telephone Company ("Fidelity"), states as follows:

1. On August 11, 1998, the Commission issued its Notice of Application which established an intervention deadline of August 26, 1998, for parties to seek to intervene or otherwise participate in this matter.
2. On or before August 26, 1998, the MMG, MCI, Sprint, AT&T, CompTel, McLeod, and Digital filed Applications to Intervene, and the STCG and Fidelity filed Applications to Participate Without Intervention.

3. SBLD does not oppose the intervention and participation without intervention as requested by these parties. However, it is important to re-iterate that the purpose of this proceeding is to resolve with the Commission any issues directly related to Missouri's statutory requirements and the Commission's rules for certification, as well as resolve any issues directly related to SBLD's tariff. The purpose of this proceeding is not to litigate or resolve issues related to Southwestern Bell Telephone Company's ("SWBT") compliance with the federal Telecommunications Act of 1996 for obtaining Section 271 relief. When SWBT's Section 271 filing is made, it will demonstrate SWBT's and SBLD's compliance with the requirements of the Act for obtaining 271 relief.
4. Contrary to the suggestions of CompTel, SBLD's Application is not premature since any Certificate of Service Authority granted in this proceeding would be expressly conditioned upon federal authority to provide in-region interLATA services. This proceeding will resolve expeditiously any issues related to SBLD's tariff and other ministerial or statutory requirements related to interexchange certification. Such resolution will allow SBLD to commence providing competitive Interexchange Telecommunications Services within Missouri as soon as practicable, when SBLD is permitted to provide in-region interLATA services by federal law.

WHEREFORE, having responded to the Applications to Intervene and Applications to Participate Without Intervention filed herein, SBLD respectfully renews its request that the Missouri Public Service Commission grant it a Certificate of Service Authority to provide Interexchange Telecommunications Services within the State of Missouri and approve its tariffs,

rules and regulations, conditioned on federal authority to provide in-region interLATA services, classify SBLD as a competitive telecommunications company, and waive the rules and statutory provisions normally waived for competitive, interexchange carriers in Missouri.

Respectfully submitted,



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ATTORNEYS FOR APPLICANT

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 1st day of September, 1998, to:

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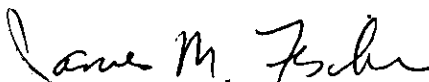
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