MCI Telecommunications Corporation



Southwest Division MCI Building 100 South Fourth Street St. Louis, Missouri 63102 (314) 342-8900

July 22, 1988

Mr. Harvey G. Hubbs,
Secretary
Missouri Public Service Commission
Truman State Office Bldg.
5th Floor
301 W. High Street
Jefferson City, MO 65101

Re: Cases Nos. TA-88-218, TR-88-282, TR-88-283, TR-88-284 and TR-89-6

Dear Mr. Hubbs:

Enclosed for filing in the above-referenced consolidated cases please find the original and 15 copies of MCI Telecommunications Corporation's Application to Intervene.

Thank you for your assistance in bringing this matter to the attention of the Commission.

Sincerely,

Edward J. cadieux

Regulatory Attorney

MCI Telecommunications Corp.

Edward S. Coliens

EJC/rls

CC:

All parties of record C.K. Casteel, Jr. Leland B. Curtis Carl J. Lumley

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FURLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the matter of the application of American Operator Services, Inc. for a certificate of service authority to provide Intrastate Operator-Assisted Resold Telecommunications Services.)))	Case :	No.	TA-88-218
In the matter of Teleconnect Company for authority to file tariff sheets designed to establish Operator Services within its certificated service area in the State of Missouri.)))	Case	No.	TR-88-282
In the matter of Dial U.S. for authority to file tariff sheets designed to establish Operator Services within its certificated service area in the State of Missouri.))))	Case 1	No.	TR-88-283
In the matter of Dial U.S.A. for authority to file tariff sheets designed to establish Operator Services within its certificated service area in the State of Missouri.))))	Case 1	No.	TR-88-284
In the matter of International Telecharge, Inc. for authority to file tariff sheets designed to establish Operator Services within its certificated sevice area in the State of Missouri.))))	Case 1	io.	TR-89-6

MCI TELECOMMUNICATIONS CORPORATION'S APPLICATION TO INTERVENE

Comes now MCI Telecommunications Corporation (MCI) and for its Application for an Order allowing it to intervene in the above-entitled proceeding states to the Missouri Public Service Commission (the Commission) as follows:

1. MCI is an 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. Its principal Missouri offices are located at 100 South Fourth Street, St. Louis, Missouri 63102. It is an authorized provider of intrastate interexchange telecommunications services in Missouri under certificates 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.

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

Leland B. Curtis
Carl J. Lumley
Curtis, Bamburg, Oetting
Brackman & Crossen, P.C.
130 S. Bemiston, Suite 200
Clayton, MO 63105

Edward J. Cadieux
Regulatory Attorney
C.K. Casteel, Jr.
Senior Attorney
MCI Telecommunications Corp.
Southwest Division
100 S. Fourth Street,
Suite 1200
St. Louis, MO 63102

- 3. This consolidated proceeding includes the Application for Certification of American Operator Services, Inc., and Commission investigations of operator services tariffs filed by Teleconnect Company, Dial U.S., Dial U.S.A., and International Telecharge, Inc. The Commission consolidated these matters by its Order dated July 15, 1988 for the purpose of developing "a cogent policy as to the appropriate degree of regulation" for providers of operator services, and established July 29, 1988 as the intervention deadline.
- 4. MCI seeks to intervene in this proceeding on the grounds that it is a provider of interexchange telecommunications service in Missouri, as well as a provider of interstate operator services. MCI has an interest in this proceeding because the Commission's decision may affect the conditions under which MCI will be permitted to provide operator services on an intrastate basis in Missouri in the future.
- 5. MCI's interests as a competitor in the Missouri interexchange telecommunications industry are different from those of the general public. Furthermore, MCI's intervention in this proceeding is in the public interest because of MCI's interest in enhancing competition and because of its expertise in the telecommunications industry.

WHEREFORE, MCI Telecommunications Corporation respectfully requests the Commission to issue its Order allowing MCI to intervene in this proceeding.

Respectfully submitted,

Edward J. Cadieux Regulatory Attorney C.K. Casteel, Jr. Senior Attorney

MCI Telecommunications Corp.

Southwest Division 100 S. Fourth Street Suite 1200 St. Louis, MO 63102 (314) 342-8964

Attorneys for

MCI Telecommunications Corp.

CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing was served upon the persons below named this $\frac{22}{3}$ day of July, 1988 by placing same in a postage prepaid envelope and by depositing in the U.S. Mail:

Joel W. Mixon
Network Manager
Dial U.S.
c/o Hedges Communications
1949 E. Sunshine, Suite 1-220
Springfield, Missouri 65804

Joel W. Mixon
Network Manager
Dial U.S.A.
c/o Communications Cable-Laying Co.
1045 East Trafficway
Springfield, Missouri 65802

Richard S. Brownlee, III Attorney at Law Hendren and Andrae P.O. Box 1069 Jefferson City, Missouri 65102

Mark P. Johnson Attorney at Law 1400 Commerce Bank Building 1000 Walnut Street Kansas City, Missouri 64106 Attorney for American Operator Services, Inc.

Philip R. Newmark Attorney at Law 7777 Bonhomme, Suite 1910 Clayton, Missouri 63105 Attorney for Midwest Independent Coin Payphone Association

Durward D. Dupre
Vice President and General Solicitor-Missouri
Southwestern Bell Telephone Company
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St. Louis, Missouri 63101

Eddie M. Pope General Counsel International Telecharge, Inc. 108 South Akard Street Dallas, Texas 75202

Jeremiah D. Finnegan Attorney at Law 4049 Pennsylvania, Suite 300 Kansas City, Missouri 64111

Joni K. Ott Attorney at Law Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Edward J. Cakien