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0000

January 13, 2004

FILED²

JAN 22 2004

Missouri Public
Service Commission

RECEIVED
JAN 16 2004

Steve Gaw

Steve Gaw, Chairman
Missouri Public Service Commission
Governor Office Building
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102

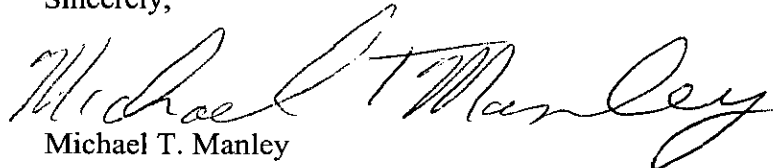
Re: *In the Matter of a Commission Inquiry into the Possibility of Impairment without Unbundled Local Circuit Switching When Serving the Mass Market; Case No. TO-2004-0207*

Dear Chairman Gaw:

Our firm serves as local counsel for David Van Os & Associates, P.C., who appears as counsel for the Communication Workers of America, in connection with the above referenced matter. Enclosed please find the original and eight (8) copies of *Communications Workers of America's Motion to Intervene*.

Thank you for your time and attention to this matter. Please feel free to call if there are any questions.

Sincerely,


Michael T. Manley

cc: Matt Holder, Esq.

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

FILED²
JAN 22 2004

In the Matter of a Commission Inquiry into)
the Possibility of Impairment without)
Unbundled Local Circuit Switching When)
Serving the Mass Market)

Case No. TO-2004-0207

Missouri Public
Service Commission

COMMUNICATIONS WORKERS OF AMERICA'S MOTION TO INTERVENE

COMES NOW Communications Workers of America, AFL-CIO, CLC,
(Hereinafter "CWA") and files this Motion to Intervene pursuant to Missouri State
Regulation 4 CSR 240-2.075 in the above-referenced proceeding, and would respectfully
show the Commission the following:

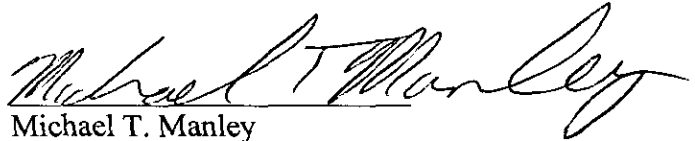
1. CWA is a labor organization that is the certified bargaining representative of
employees of Southwestern Bell Telephone Company, AT&T, and other
telecommunication carriers participating in this proceeding.
2. CWA's sole stake in this proceeding is to ensure that the rights and interests of its
members and other telecommunication industry employees are represented in this
proceeding. Accordingly, CWA seeks to intervene in this proceeding so that it may
participate and contribute on behalf of telecommunication industry employees.

WHEREFORE, PREMISES CONSIDERED Communications Workers of
America hereby request that its Motion to Intervene be GRANTED and that it be allowed
to fully participate in these proceedings before the Public Service Commission of the
State of Missouri.

Respectfully submitted,

BLAKE & UHLIG, P.A.

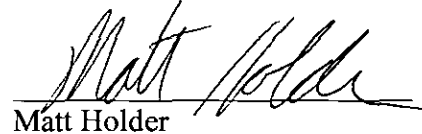
BY:



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DAVID VAN OS & ASSOCIATES P.C.

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ATTORNEYS FOR INTERVENOR
COMMUNICATIONS WORKERS OF AMERICA

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing instrument has been forwarded to the attached service list on January 13, 2004.


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