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January 6, 2005

Mr. Dale Hardy Roberts  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**FILED**

JAN 06 2005

Re: Case No. LA-2005-0150

Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing on behalf of the Small Telephone Company Group, please find an original and eight (8) copies of an Application to Intervene in the above-referenced case.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM/lar

Enclosure

cc: Michael Dandino  
Dan Joyce  
Mark Comley

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JAN 06 2005

Missouri Public  
Service Commission

In the Matter of the Application )  
of MCC Telephony of Missouri, Inc. )  
for a Certificate of Service Authority to )  
Provide Basic Local Exchange, )  
Non-Switched Local Exchange and )  
Interexchange Telecommunications )  
Service in the State of Missouri and to )  
Classify said Services as Competitive. )

Case No. LA-2005-0150

APPLICATION TO INTERVENE

Comes now the Small Telephone Company Group, which companies are set out in Attachment A, (hereinafter referred to as "Applicants") and in support of their Application to Intervene in the above-captioned matter state that:

1. Applicants currently provide telecommunications services to members of the public located in those areas certificated to them by the Missouri Public Service Commission ("Commission"). As is relevant to this case, Applicants provide "basic local telecommunications services" within the exchanges as defined by their respective tariffs which are on file with and approved by the Commission. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020, RSMo 2000, and are, therefore, subject to the jurisdiction, regulation and control of the Commission as provided by law. Applicants also are rural telephone companies and incumbent local exchange carriers as defined by the Federal Telecommunications Act of 1996 (the "Act").

2. All correspondence, communications, orders and decisions in this matter should be addressed to the following:

W. R. England, III  
Sondra B. Morgan  
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Jefferson City, Missouri 65102  
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3. On November 30, 2004, MCC Telephony of Missouri, Inc. ("MCC") filed an Application requesting a certificate of service authority to provide basic local exchange, non-switched local exchange and interexchange telecommunications service in the State of Missouri. Specifically, MCC wishes to provide all forms of switched basic service in defined exchange areas, and dedicated local and interexchange services throughout the State of Missouri. MCC states that it plans to offer various point-to-point dedicated service arrangements, and that through its application it "seeks the broadest possible authority by which to lawfully provide voice communication services in the exchanges identified." MCC states that it intends to "make use of any and all facilities by which to lawfully complete voice grade calls including facilities that are IP based." In fact, MCC's network structure will be predominantly IP-based.

4. On December 7, 2004, the Commission issued its Notice of Applications setting an intervention deadline of January 6, 2005.

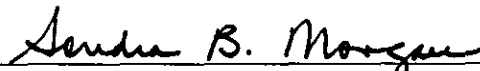
5. The Small Telephone Company Group files this Application to Intervene in the instant proceeding on the grounds that the granting or denying of a certificate of service authority to provide telecommunications services as requested in its application will directly affect Applicants' interests as providers of telecommunication services in Missouri. It is not clear at this time how MCC's stated intention to provide various point-to-point dedicated service arrangements over a

predominantly IP-based network will affect Applicants' services, but Applicants should be allowed to intervene to protect their interests as providers in Missouri. Applicants thus have an interest in this proceeding that is different from that of the general public. In addition, Applicants' expertise in and perspective on the provision of telecommunications services in this State will aid the Commission in resolving the issues related to this proceeding. Consequently, their intervention and participation will serve the public interest.

6. At this time, Applicants do not have enough information to determine if they support or oppose MCC's application.

WHEREFORE, the Small Telephone Company Group respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned proceedings and for such other orders as are reasonable in the circumstances.

Respectfully submitted,



W. R. England, III                      MoBar #23975  
Sondra B. Morgan                      MoBar #35482  
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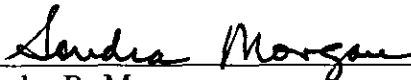
Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic transmission, hand-delivered, or mailed, United States Mail, postage prepaid, this 6th day of January, 2005, to:

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Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

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Jefferson City, Missouri 65102

  
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Sondra B. Morgan

**SMALL TELEPHONE COMPANY GROUP**

BPS Telephone Company,  
Cass County Telephone Company,  
Citizens Telephone Company of Higginsville, Missouri, Inc.,  
Craw-Kan Telephone Cooperative, Inc.,  
Ellington Telephone Company,  
Farber Telephone Company,  
Fidelity Telephone Company  
Goodman Telephone Company, Inc.,  
Granby Telephone Company,  
Grand River Mutual Telephone Corporation,  
Green Hills Telephone Corporation,  
Holway Telephone Company,  
Iamo Telephone Company,  
KLM Telephone Company,  
Kingdom Telephone Company,  
Lathrop Telephone Company,  
Le-Ru Telephone Company,  
Mark Twain Rural Telephone Company,  
McDonald County Telephone Company,  
Miller Telephone Company,  
New Florence Telephone Company,  
New London Telephone Company,  
Orchard Farm Telephone Company,  
Oregon Farmers Mutual Telephone Company,  
Ozark Telephone Company,  
Peace Valley Telephone Company,  
Rock Port Telephone Company,  
Seneca Telephone Company,  
Steelville Telephone Exchange, Inc.  
Stoutland Telephone Company