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January 12, 1999

FILED

JAN 12 1999

**Missouri Public
Service Commission**

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. TO-99-227

Dear Judge Roberts:

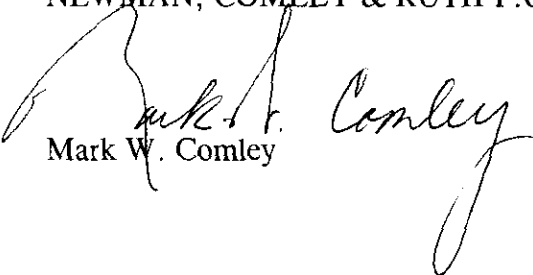
Please find enclosed for filing in the referenced matter an original and fourteen copies of a Motion to Reconsider Application to Intervene of Show Me Competition, Inc.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel
Diane Miller
All parties of record

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

JAN 12 1999

In the matter of the application of Southwestern
Bell Telephone Company to Provide Notice of
Intent to File an Application for Authorization
to Provide In-region InterLATA Services
Originating in Missouri Pursuant to Section 271
of the Telecommunications Act of 1996.

Missouri Public
Service Commission

Case No. TO-99-227

MOTION TO RECONSIDER
APPLICATION TO INTERVENE
OF SHOW ME COMPETITION, INC.

COMES NOW SHOW ME COMPETITION, INC. (hereinafter Show Me) and in response to the Commission's order dated December 30, 1998 respectfully submits the following:

1. In its December 30, 1998 order the Commission ruled that "so far as the Commission can determine from [Show Me's] application, there may be no [member] entity which has an interest that is not already represented in this matter." The Commission granted Show Me ten days within which to clarify the identity of its members and point out which have interests that are not already represented in the case.

2. In this motion, Show Me will identify in greater detail three of its members, Missouri Citizen Action, the American Association of Retired Persons,¹ and COMPTel-MO.

Missouri Citizen Action

3. Missouri Citizen Action (MCA) is a statewide coalition of labor, senior citizen, consumer and community organizations, with combined membership of over 50,000 households. Its offices are located at 11340 Hammack Drive, Bridgeton, Missouri. MCA works to empower middle and lower income Missouri citizens and families on a range of economic and civic justice issues. For the past several years, MCA's primary focus has been on health care reform. The organization has been

¹The members of Show Me were listed on Appendix A to the original application and AARP was omitted. Accordingly, Show Me amends the Appendix at this time by interlineating the name of the American Association of Retired Persons.

instrumental at the state level in drafting and leading the campaign for the Missouri Universal Health Assurance Program.

4. Over its history, MCA (and its predecessor organization, the Missouri Citizen/Labor Coalition) has been closely involved in protecting the rights of utility consumers on a variety of issues, including telecommunications deregulation and oil and natural gas pricing issues.

5. MCA has a diverse constituency but nonetheless the interests of the organization are distinguishable and different from those of the general public. Its interests are not separately represented by any other party to the docket.

AARP

6. The American Association of Retired Persons (AARP) is a nonprofit, nonpartisan organization dedicated to helping older Americans achieve lives of independence, dignity and purpose. AARP is dedicated to shaping and enriching the experience of aging for each member and for society. Its office in Missouri is located at 700 West 47th St., #110, Kansas City, MO 64112 .

7. AARP has over 710,000 members in Missouri and they reside throughout the state. Many AARP members are senior citizens who rely on fixed incomes that are derived from retirement benefits, savings and government programs. They are also dependent on telephone service in communicating with family, friends, health care providers and governmental agencies. Competition in the telephone industry is of vital interest to AARP members. Members want quality services at prices that are affordable within their incomes. Utility costs, including costs for telecommunications services, for AARP members are a higher percentage of monthly income than for others. Changes in the cost of telephone service affect the members in a manner different from the general public. AARP represents a segment of the consuming public which is not represented by any other party to this case.

COMPTEL-MO

8. COMPTEL-MO is a Missouri not-for-profit corporation, the members of which are several

interexchange telecommunications companies who provide interexchange services to customers in the State of Missouri. COMPTel-MO has been an intervening party in many cases before the Public Service Commission. All but two of the COMPTel-MO members are also certificated as competitive local exchange companies in Missouri and are therefore named as separate parties to this case. The two remaining members of COMPTel-MO, specifically, CommuniGroup of Kansas City, Inc. (CGI) and Valu-Line of St. Joseph, Inc. (Valu-Line) are certificated as interexchange carriers only.

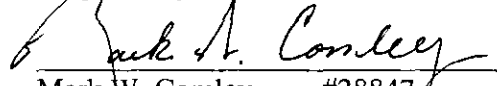
9. If Southwestern Bell Telephone Company (SWBT) is granted in region long distance authority as proposed in this docket, CGI and Valu-Line will be its direct competitors. CGI and Valu-Line are relatively small carriers when compared to others that are represented in this docket. Loss of market share is a critical consideration. Their interests are not represented by any other party to this proceeding.

10. Membership in Show Me gives many members thereof, like MCA, AARP and COMPTel-MO, a voice in a variety of matters and proceedings in which they otherwise could not individually afford to appear. This docket is no exception. That some members of Show Me independently appear in this docket should not be a reason to exclude the association and the participation, albeit indirect, of its other members.

11. Show Me's interest in this proceeding is shaped by the interests of its members. As set out above those interests are distinct from the interests of the general public and other parties to this matter. Show Me's members include organizations that address the concerns of discrete segments of the residents of this state, including low and middle income families and senior citizens. Show Me's intervention would serve the public interest.

WHEREFORE, Show Me respectfully requests the Commission to issue its order allowing Show Me to intervene in this proceeding.

Respectfully submitted,



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NEWMAN, COMLEY & RUTH P.C.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, Missouri 65102-0537
(573) 634-2266
(573) 636-3306
Attorneys for Show Me Competition, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, on this 12th day of January, 1999, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102-7800

James M. Fischer
101 West McCarty Street, Suite 215
Jefferson City, MO 65101

Paul G. Lane, Leo J. Bub, Anthony K. Conroy and
Katherine C. Swaller
Southwestern Bell Telephone Co.
One Bell Center, Room 3520
St. Louis, MO 63101-1976

Paul S. DeFord
Lathrop & Gage
2345 Grand Blvd., Suite 2500
Kansas City, MO 64108

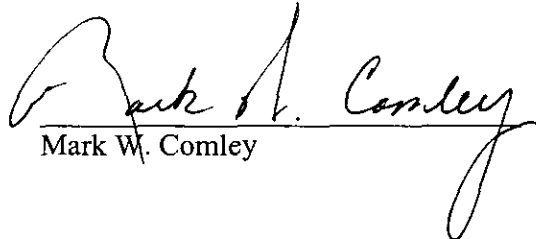
MCI Telecommunications Corporation
100 South Fourth Street
St. Louis, MO 63102

Richard S. Brownlee, III
Hendren and Andrae
PO Box 1069
Jefferson City, MO 65102-1069

Carl J. Lumley
Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule
130 S. Bemiston, Suite 200
Clayton, MO 63105

Kenneth A. Schifman
Sprint Communications Co., L.P.
8140 Ward Parkway, 5E
Kansas City, MO 64114

All the companies listed on Attachment A.



Mark W. Comley

Certificated Missouri Competitive Local Exchange Companies

CLECs:

American Communications Services
of Kansas City Inc.
131 Nat'l Business Pkwy.
Suite 100
Annapolis Junction, MD 20701

Ameritech Communications
International
9525 W. Bryn Mawr, Suite 600
Rosemont, IL 60018

AT&T Communications of the
Southwest, Inc.
101 West McCarty, Suite 216
Jefferson City, MO 65101

Atlas Communications, Ltd.
482 Norristown Rd., Suite 200
Blue Bell, PA 19422

BellSouth BSE, INC.
2727 Paces Ferry Road
Atlanta, GA 30339

Birch Telcom of Missouri, Inc.
1004 Baltimore Ave., Suite 900
Kansas City, MO 64105

Broadspan Communications, Inc.
11756 Borman Drive
Suite 101
St. Louis, MO 63146

Brooks Fiber Communications of
Missouri
One Brooks Center Parkway
Town & Country, MO 63017

BTI
4300 Six Forks Rd, Suite 400
Raleigh, NC 27609

Dial & Save of Missouri, Inc.
8750 N. Central Expressway,
Suite 1500
Dallas, TX 75231

Dial US
333 Park Central E
Suite 926
Springfield, MO 65806

Digital Teleport, Inc.
11111 Dorsett Road
St. Louis, MO 63043

Dobson Wireless, Inc.
13439 N. Broadway Ext.
Suite 200
Oklahoma City, OK 73114

Excel Telecommunication Systems,
Inc.
8750 N Central Expressway
Box #6
Dallas, TX 75231

ExOp of Missouri, Inc.
402 A East Bannister Road
Kansas City, MO 64131

EZ Talk Communications, L.L.C.
4727 South Main
Stafford, TX 77477

Fast Connections, Inc.
2200 Ross Ave., Suite 3838
Dallas, TX 75201

Frontier Telemanagement Inc.
180 S. Clinton
Rochester, NY 14646

GE EXCHANGE
6540 Powers Ferry Road
Atlanta, GA 30339

Green Hills Communications, Inc.
7926 NE State Route M
Breckenridge, MO 64625

Group Long Distance, Inc.
6455 E. Johns Crossing
Suite 285
Duluth, GA 30097

GTE Communications Corporation
6665 N. MacArthur
Irving, TX 75039

ICG Telecom Group, Inc.
161 Inverness Drive West
Englewood, CO 80112

Intermedia Communications Inc.
3625 Queen Palm Drive
Tampa, FL 33619

Kansas City Fiber Network, LP
1111 Main St., Suite 300
Kansas City, MO 64105

LCI International Telecom Corp.
d/b/a Qwest Communications
Services
4250 N. Fairfax Drive
Suite 12W055
Arlington, VA 22203

LDD, Inc.
24 South Minnesota
Cape Girardeau, MO 63701

LDM Systems, Inc.
254 S. Main St.
New York, NY 10956

Local Fone Service, Inc.
624 Six Flags Drive, Suite 214
Arlington, TX 76011

Local Line America, Inc.
2680 State Rd.
Cuyahoga Falls, OH 44223

Mark Twain Communications
Company
P.O. Box 128
Hurdland, MO 63547

MAXCOM, Inc.
10647 Widmer Road
Lenexa, KS 66215

Max-Tel Communications, Inc.
102 W. Franklin
Alvord, TX 76225

MCIMetro Access Transmission
Services
2400 North Glenville Dr.
Richardson, TX 75082

McLeodUSA Telecommunications
Services
6400 C Street SW
Cedar Rapids, IA 52406

Megsinet-CLEC, Inc.
225 West Ohio, Suite 200
Chicago, IL 60610

MFS Intelenet of Missouri, Inc.
1705 S. Capital of Texas Hwy.
Suite 100
Austin, TX 78746

Micomm Services, Inc.
4001 McEwen Drive, Suite 200
Dallas, TX 75244

Microwave Services, Inc.
3 Bala Plaza East, Suite 502
Bala Cynwyd, PA 19004

Midwestern Tel
3809 Castelman Ave.
Suite 100
St. Louis, MO 63110

Miller Telephone Co
209 East Main
Miller, MO 65707

Missouri Comm South, Inc.
101 Randol Mill, Suite 108
Arlington, TX 76011

Navigator Telecommunications,
LLC
212 Center St., Suite 1100
Little Rock, AR 72201

NOW Communications, Inc.
713 Country Place Drive
Jackson, MS 39208-6619

Preferred Carrier Services, Inc.
500 Grapevine Hwy., Suite 300
Hurst, TX 76054

Omniplex Communications Group
743 Sprint 40 Park, Suite 250
Chesterfield, MO 63005

QCC, Inc.
8829 Bond Street
Overland Park, KS 66214

Quintelco, INC.
1 Blue Hill Plaza
Pearl River, NY 10965

Reconex
9620 S.W. Barur Blvd., Suite 330
Portland, OR 97219

REN-TEL Communications, Inc.
85 Pine Haven Dr.
Carrollton, GA 30116

Sprint Communications Company
8140 Ward Parkway-5E
Kansas City, MO 64114

Suretel, Inc.
5 North McCormick
Oklahoma City, OK 73127

TCG St. Louis
233 S Wacker Drive, Suite 2100
Chicago, IL 60606

Tel-Link, L.L.C.
1001 Third Avenue West
Suite 354
Bradenton, FL 34205

Tel-Save, Incorporated of
Pennsylvania
6805 Route 202
New Hope, PA 18938

Teligent, Inc.
8065 Leesburg Pike, Suite 400
Vienna, VA 22182

The Cube
1063 Wirt Road, Suite 202
Houston, TX 77005

Transamerican telephone
209 E University
Danton, TX 76201

U.S. Telco, Inc.
1600 Pacific Avenue #2700
Dallas, TX 75201-3565

USLD Communications, Inc.
4250 North Fairfax Drive
12W002
Arlington, VA 22203

USN Communications Southwest,
Inc.
10 S. Riverside Plaza, Suite 401
Chicago, IL 60606

Winstar Wireless of Missouri, Inc.
7799 Leesburg Pike, Suite 401 S.
Tysons Corner, VA 22043

WorldCom Technologies
1705 S. Capital of Texas Hwy.,
Suite 100
Austin, TX 78746

Z-Tel Communications, Inc.
777 S. Harbour Island Blvd.
Suite 990
Tampa, FL 33602

LOCAL COMPANIES:

ALLTEL Missouri, Inc
1705 S. Lillian
PO Box 180
Bolivar, MO 65613

Alma Telephone Company
206 S. County Rd
Alma, MO 64001

Atlas Communications, Ltd.
482 Norristown Rd., Suite 200
Blue Bell, PA 19422

Birch Telecom of Missouri, Inc.
1004 Baltimore Ave., Suite 900
Kansas City, MO 64105

Bourbeuse Telephone Company
64 N. Clark
Sullivan, MO 63080

BPS Telephone Company
P.O. Box 669
Malden, MO 63863

Cass County Telephone Company
P.O. Box 647
Peculiar, MO 64078

Chariton Valley Telephone
Corporation
P.O. Box 407
Bucklin, MO 64631

Choctaw Telephone Company
P.O. Box 82
221 West Main
Halltown, MO 65664

Citizens Telephone Co. of
Higginsville, Missouri, Inc.
1905 Walnut
P.O. Box 737
Higginsville, MO 64037

Comcast Telecommunications, Inc.
d/b/a Comcast Long Distance
211 South Gulph Road
King of Prussia, PA 19406

Craw-Kan Telephone Cooperative
200 N. Ozark
P.O. box 100
Girard, KS 66743

Digital Broadcast Network Corp.
977 Charter Commons
Chesterfield, MO 63017

Ellington Telephone Company
P.O. Box 400
201 College
Ellington, MO 63638

Farber Telephone Company
Main & Linn
Farber, MO 63345

Fidelity Telephone Company
64 North Clark Ave.
Sullivan, MO 63080

Goodman Telephone Company, Inc
P.O. Box 592
815 Oneida
Seneca, MO 64865

Granby Telephone Company
Box 209
Granby, MO 64844

Grand River Mutual Telephone
Company
1001 Kentucky Ave
Princeton, MO 64673

Green Hills Telephone Corporation
P.O. Box 227
Breckenridge, MO 64625

Group Long Distance, Inc.
1451 West Cypress Creek Road,
Suite 2001
Fort Lauderdale, FL 33309

GTE Arkansas Incorporated
601 Monroe Street, Suite 304
Jefferson City, MO 65101

GTE Midwest Incorporated
601 Monroe Street, Suite 304
Jefferson City, MO 65101

Holway Telephone Company
211 Ash St.
P.O. Box 112
Maitland, MO 64466

Iamo Telephone Company
P.O. Box 368
104 Crook St.
Coin, IA 51636

Kingdom Telephone Company
P.O. Box 97
211 S. Main
Auxvasse, MO 65231

KLM Telephone Company
P.O. Box 30
Rich Hill, MO 64779

Lathrop Telephone Company
P.O. Box 167
Princeton, MO 64673

Le-Ru Telephone Company, Inc.
P.O. Box 147
Stella, MO 64867

Mark Twain Rural Telephone
Company
P.O. Box 68
Hurdland, MO 63547

McDonald County Telephone Company
P.O. Box 207
Pineville, MO 64856

McLeodUSA Telecommunications
Services
6400 C Street SW
Cedar Rapids, IA 52406

Mid-Missouri Telephone Company
P.O. Box 38
215 Roe St.
Pilot Grove, MO 65276

Missouri Comm South, Inc.
101 Randol Mill, Suite 108
Arlington, TX 76011

Missouri CSI Corp.
12835 E Arapahoe Rd., 5th Floor
Englewood, CO 80112

Mo-Kan Dial Co., Inc.
Box 429
112 S. Broadway
Louisburg, KS 66053

Modern Telecommunications Co.
718 South West St
Green City, MO 63545

New Florence Telephone Company
192 West Broadway
P.O. Box 526
Peculiar, MO 64078

New London Telephone Company
501 S. Main St.
P.O. Box 369
New London, MO 63459

Northeast Missouri Rural Telephone
Company
Route Three
718 West Street
Green City, MO 63545

Ominplex Communications Group
743 Sprint 40 Park, Suite 250
Chesterfield, MO 63005

Orchard Farm Telephone Co
5065 North Highway 94
St. Charles, MO 63301

Oregon Farmers Mutual Telephone
Company
118 East Nodaway
Box 227
Oregon, MO 64473

Peace Valley Telephone Company,
Inc.
P.O. Box 9
7101 State Hwy W.
Peace Valley, MO 65788

Rock Port Telephone Company
107 Opp St.
P.O. Box 147
Rock Port, MO 64482

Seneca Telephone Company
P.O. Box 329
Seneca, MO 64865

Southwestern Bell Telephone
Company
General Counsel-Missouri
One Bell Center, Room 3520
St. Louis, MO 63101

Sprint
5454 West 110th St
Overland Park, KS 66211

Steelville Telephone Exchange,
Inc
P.O. Box 370
Steelville, MO 65565

Stoutland Telephone Company
Highway T
P.O. Box 97
Stoutland, MO 65567

TCG Kansas City, Inc.
233 S. Wacker Drive, Suite 2100
Chicago, IL 60606

TDS Engineering, L.L.C.
229 East Fourth Street
P.O. Box 297
Carthage, MO 64836

Teligent, Inc.
8065 Leesburg Pike, Suite 400
Vienna, VA 22182

**Missouri Companies With Pending Applications for Authority
to Provide Competitive Local Exchange Telecommunications
in Missouri as of December 2, 1998**

ACI Corp.

7337 S. Revere Parkway
Englewood, CO 80112

Advanced Communications Group,
Inc.

390 Woodsmill Rd. South
Suite 150
St. Louis, MO 63017

BarTel Communications, Inc.
14 Cliff-side
Glendale, MO 63122

Camarato Distributing, Inc.
900 Camarato Drive
Herrin, IL 62948

Choctaw Communications, L.C.
d/b/a Smoke Signal Communica-
tions
8400 S. Gessner
Houston, TX 77074

DIECA Communications, Inc.
c/o Covad Communications Company
2330 Central Expressway
Santa Clara, CA 95050

Gabriel Communications of
Missouri, Inc.
16650 Chesterfield Grove Rd.
Suite 110
Chesterfield, MO 63005

GTE Communications Corporation
5221 N. O'Connor Blvd.
13th Floor
Irving, TX 75039

JATO Communications Corp.
5660 Greenwood Plaza Blvd.
Suite 220
Englewood, CO 80111

Level 3 Communications, LLC
1450 Infinite Drive
Louisville, CO 80027

NET-tel Corporation
d/b/a NET-tel Communications
Corporation
3050 K Street, N.W.
Suite 250
Washington, DC 20007

NEXTLINK MISSOURI, INC.
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004

The Pager Company
5321 E. 9th St.
Kansas City, MO 64124

Simply Local Services, Inc.
11406 Gravois Road, Suite 100
St. Louis, MO 63126

Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Ave.
Miami, FL 33133

Transwire Missouri Operations,
LLC
8 West 19th Street
New York, NY 10011

United States Telecommunications
Inc. d/b/a Tel Com Plus
13902 N. Dale Mabry, Suite 212
Tampa, FL 33618

Universal Telephone
2611 E. Harry
Wichita, KS 67211