

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND
PROFESSIONAL CORPORATION
312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456

AREA CODE 873
TELEPHONE 838-7168
FACSIMILE 838-0427

DAVID V.O. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
SARAH J. MAXWELL
CHARLES E. SMARR
MARK O. ANDERSON
DEAN L. COOPER
CHRISTINE J. EGBARTS
TIMOTHY T. STEWART
GREGORY C. MITCHELL

FILED

AUG 20 1997

August 20, 1997

PUBLIC SERVICE COMMISSION

Mr. Cecil Wright
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Case No. TO-98-41

Dear Mr. Wright:

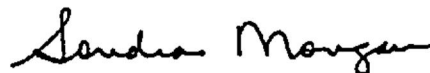
Enclosed please find the original plus fourteen (14) copies of The Small Telephone Company Group's and Fidelity's Application to Participate for filing in the above referenced matter. Would you please see that this is brought to the attention of the appropriate Commission personnel. I have also enclosed an extra copy which I would ask you to stamp filed and return to my office. If there are any questions regarding the attached, please feel free to give me a call.

I thank you for your cooperation in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondara B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
James C. Stroo
Joel M. Margolis

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

FILED

AUG 20 1997

In the Matter of the Joint Application)
of GTE Midwest Incorporated and Dial)
Call, Inc. for Approval of Interconnection)
Agreement Under the Telecommunications)
Act of 1996.)

Case No. TO-98 41

PUBLIC SERVICE COMMISSION

**THE SMALL TELEPHONE COMPANY GROUP'S
AND FIDELITY'S APPLICATION TO PARTICIPATE**

Come now the Small Telephone Company Group, members of which are set out in Attachment A, Fidelity Telephone Company and Bourbeuse Telephone Company (hereinafter "Fidelity") (both the Small Telephone Company Group and Fidelity are sometimes collectively referred to as "Applicants") and in support of their Application to Participate Without Intervention in the above-captioned matter state that:

1. Applicants currently provide telecommunication 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 "local telecommunication 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 Section 386.020, RSMO 1994, 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
Brydon, Swearngen & England, P.C.
P.O. Box 456
Jefferson City, Missouri 65102
(573) 635-7166

3. On July 29, 1997, GTE Midwest Incorporated ("GTE") and Dial Call, Inc. (Nextel Communications or "Nextel") filed an Application with the Commission for approval of an interconnection agreement. The Application was filed for approval under the provisions of the Act, and the parties state that the agreement complies with § 252(e) of the Act, is not discriminatory and is consistent with the public interest.

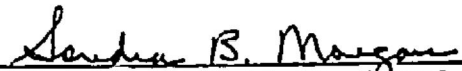
4. On July 31, 1997, the Commission issued its Order and Notice in the instant docket. This order, among other things, established a deadline for the filing of applications to participate without intervention and a date for filing comments.

5. Applicants have obtained a copy of the interconnection agreement but, as of the filing of this application, have not had time to thoroughly review its contents and provisions. Nevertheless, Applicants file this Application because of their concerns that the interconnection agreement may have an impact on their operations and/or their existing relationships with GTE and Nextel. More specifically Applicants are concerned with the effect, if any, the proposed interconnection agreement with a wireless carrier may have upon agreements between wireless carriers and other local exchange companies in light of the Commission's recent ruling in United Telephone Company of Missouri's Complaint Against Southwestern Bell Telephone Company for Failure to Pay Terminating Access for Cellular-Originated Calls Terminating in United's Territory, Case No. TC-96-112, and

Southwestern Bell Telephone Company's recent tariff filing designed to revise its Wireless Carrier Interconnection Service, Case No. TT-97-524. Applicants, therefore, have an interest in this proceeding which is different from that of the general public. Applicants' expertise in and perspective on the provision of telecommunications services in the state will also aid the Commission in determining whether or not the proposed interconnection agreement 1) discriminates against another telecommunication carrier or 2) is consistent with the public interest, convenience and necessity. Consequently, Applicants participation in this docket will serve the public interest.

WHEREFORE, the Small Telephone Company Group and Fidelity respectfully request that the Commission issue an Order authorizing them to participate without intervention in the above captioned proceeding and for such other orders as are reasonable in the circumstances.

Respectfully Submitted,


W.R. England, III Mo. Bar #23975
Sondra B. Morgan Mo. Bar #35482
Brydon, Swearngen & England, P.C.
P.O. Box 456
Jefferson City, MO 65102

Attorneys for
The Small Telephone Company Group
and Fidelity

Certificate of Service

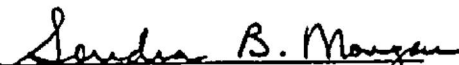
I hereby certify that a true and correct copy of the above and foregoing document was mailed, United States Mail, postage prepaid, this 10th day of August, 1997, to the following:

James C. Stroo
1000 GTE Drive
Wentzville, MO 63385

Joel M. Margolis
1505 Farm Credit Drive
McLean, Virginia 22102

Office of the Public Counsel
P.O. Box 456
Jefferson City, MO 65102

Missouri Public Service Commission
P.O. Box 7800
Jefferson City, MO 65102


W.R. England, III/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
Grand River Mutual Telephone Cooperation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop 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
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

ATTACHMENT A