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November 8, 1999

FILED

NOV - 8 1999

Missouri Public
Service Commission

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

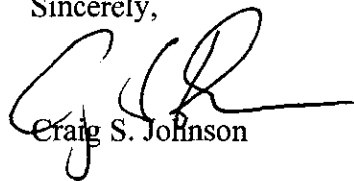
Re: TA-2000-204 / MST Application

Dear Secretary Roberts:

Enclosed for filing please find an original and 15 copies of a Motion to allow intervention out of time, and an Application to Intervene. A copy of this cover letter and a copy of the enclosures have been served upon Michael Dandino, Harry L. Thielepape, Dan Joyce, and W. R. England, III.

Thank you for seeing these matters filed and brought to the Commission's attention.

Sincerely,



Craig S. Johnson

CSJ:skl

Enclosure

cc: Michael Dandino
Harry L. Thielepape
Dan Joyce
W. R. England, III

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FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

NOV - 8 1999

Missouri Public
Service Commission

In the Matter of the Application)
of Missouri State Discount Telephone)
for a Certificate of Convenience and)
Necessity to Provide Basic Local) Case No. TA-2000-204
Telecommunications Service and Long)
Distance Service in the State of Missouri)
and to Classify Said Services and Missouri)
State Discount Telephone as Competitive.)

APPLICATION TO INTERVENE

COMES NOW the Mid-Missouri Group of Local Exchange Companies, Alma, Chariton Valley, Choctaw, Mid-Missouri, Modern, MoKan Dial, and Northeast Missouri Rural ("MMG") 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 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:

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3. On September 1, 1999, Missouri State Discount Telephone ("MSDT") filed an Application requesting a certificate of service authority to provide basic local telecommunications service and long distance service in the State of Missouri. Specifically, MSDT wishes to provide basic local exchange telecommunications service on a non-facilities, resold basis throughout all exchanges currently served by all incumbent local exchange telecommunication companies in the State of Missouri.

4. The MMG 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 basic telecommunications services throughout all exchanges currently served by all incumbent local exchange telecommunication companies in the State of Missouri will directly affect Applicants' interests as providers of telecommunication services 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.

WHEREFORE, the MMG 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.

ANDERECK, EVANS, MILNE
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By:




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ATTORNEYS FOR
MID-MISSOURI GROUP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, U. S. Mail, postage pre-paid, this 8 day of March, 1999, to Dan Joyce, Michael Dandino, Harry L. Thielepape, W. R. England, III.


Craig S. Johnson