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JUN 28 1999

Missouri Public Service Commission

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

> Re: TO-99-593

Dear Mr. Roberts:

Enclosed for filing please find an original and 15 copies of the Mid-Missouri Group's Application to Intervene in the above referenced docket.

Thank you for seeing this filed.

Sincerel

Johnson

CSJ:skl Enclosure

Office of Public Counsel

STATE OF MISSOURI PUBLIC SERVICE COMMISSION

SSOURI COMMISSION	Misso 1999
Case No. TO-99-593	Missouri Public on mission

In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangements, and Traffic Measurement.

Application to Intervene of the Mid Missouri Group

The Mid Missouri Group of local exchange companies, Alma Telephone Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company, Modern Telecommunications Company, MoKan Dial Inc., Northeast Missouri Rural Telephone Company, and Peace Valley Telephone Company, hereinafter referred to as the Mid Missouri Group, hereby applies to intervene in this proceeding. In support of this Application the Mid Missouri Group states as follows:

- 1. Communications to the Mid Missouri Group regarding this proceeding should be made to Craig S. Johnson, 305 E. McCarty St., P.O. Box 1438, Jefferson City, Missouri, 65102, telephone # 573-634-3422, fax # 573-634-7822.
- 2. The Mid Missouri Group consists of eight certificated local exchange companies providing local and exchange access services in their respective certificated exchanges. The Mid Missouri Group companies are also rural telephone companies under the Telecommunications Act of 1996, and small incumbent local exchange telecommunications company under the provisions of 1996 SB 507.
 - 3. In its June 10, 1999 Report and Order the Commission created this docket to

investigate the issues of signaling protocols, call records, trunking arrangements, and traffic measurement.

4. The MMG is interested in these topics as the result of this docket will determine, or effect the determination of, underlying issues that vitally effect the receipt of compensation for terminating access services provided by the MMG to ILECs, interexchange carriers, CLECs, and wireless carriers, among others. With the elimination of the PTC Plan and the implementation of local and toll dialing parity, there will be a significant increase in the number and type of companies participating in the exchange of traffic and information and systems necessary to assure that appropriate compensation is paid on that traffic. The interest of the Mid Missouri Group is different than that of the general public, and the MMG experience with these systems and procedures will be of assistance to the Commission in this docket.

WHEREFORE, the Mid Missouri Group respectfully requests that it be allowed to intervene and participate fully herein as parties.

ANDERECK, EVANS, MILNE PEACE & BAUMHOER

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ATTORNEYS FOR MID MISSOURI GROUP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was mailed first class, postage prepaid this 29 day of June, 1999, to:

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

Craig S Johnson, 28179