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July 2, 1999

FILED

JUL 2 1999

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

Missouri Public
Service Commission

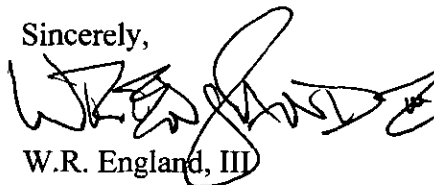
Re: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing on behalf of the Small Telephone Company Group, please find the original and fourteen (14) copies of an Application to Intervene. A copy of this document will be provided to parties of record.

Please see that this filing is brought to the attention of the appropriate Commission personnel. If there are any questions regarding this filing, please feel free to give me a call at your convenience. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,



W.R. England, III

WRE/da
Enclosure
cc: Parties of Record

FILED

JUL 2 1999

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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

CASE NO. TO-99-593

APPLICATION TO INTERVENE

Comes now the Small Telephone Company Group, members of which are set out in Attachment A, (hereinafter "STCG" or "Applicants") and in support of its Application to Intervene in the above-captioned matter state to the Missouri Public Service Commission ("Commission") as follows:

1. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020 RSMo Supp. 1998 and are therefore subject to the jurisdiction, regulation and control of the Commission as provided by law. Applicants are incumbent local exchange companies (ILECs) providing basic local, local, and exchange access services in those areas of Missouri certificated to them by the Commission.

2. Correspondence, communications, orders and decisions in this matter should be addressed to:

W.R. England, III/Brian T. McCartney
Brydon, Swearngen & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
(573) 635-7166

3. On June 15, 1999, the Commission issued its Order Directing Notice in the above-referenced case in order to investigate the issues of signaling protocols, call records, trunking

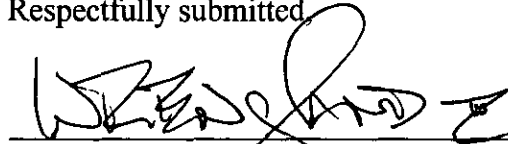
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arrangements, and traffic measurement. Interested parties were given the opportunity to intervene until July 6, 1999.

4. The STCG files this Application to Intervene in the instant proceeding on the grounds that its members have a vital interest in the investigation into and resolution of these issues. The Commission's decisions regarding signaling protocols, call records, trunking arrangements, and traffic measurement will directly affect Applicants' interests as providers of telecommunications service in Missouri. 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, the Applicants' intervention and participation will serve the public interest.

WHEREFORE, Applicants respectfully request that the Commission issue an Order authorizing them to intervene 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
Brian T. McCarthy Mo. Bar #47788
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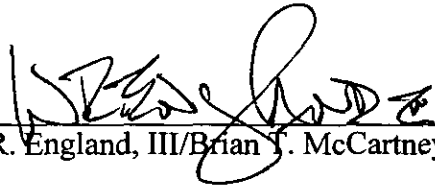
Attorneys for the Small Telephone Company Group

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 2nd day of July, 1999, to:

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

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



W.R. England, III/Brian F. McCartney

Alltel Missouri, Inc.
BPS Telephone Company
Cass County Telephone Company
Citizens Telephone Company of Higginsville, Mo., Inc.
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Farber Telephone Company
Goodman Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
Le-Ru Telephone Company
McDonald County Telephone Company
Mark Twain Rural 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
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

ATTACHMENT A