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November 1, 1999

FILED³

NOV 01 1999

Missouri Public
Service Commission

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

Re: In the Matter of the proposed Rulemaking regarding Safety Standards - Electric and Telephone Utilities and Rural Electric Cooperatives; Case No. OX-2000-175

Dear Mr. Roberts:

Enclosed please find the original plus fourteen (14) copies of Comments for filing on behalf of The Small Telephone Company Group in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel.

Thank you for your attention to this matter.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 
Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
Bob Schoonmaker

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

NOV 01 1999

Missouri Public
Service Commission

In the matter of the proposed)
Rulemaking regarding Safety)
Standards - Electric and Telephone)
Utilities and Rural Electric)
Cooperatives.)

Case No. OX-2000-175

COMMENTS OF THE SMALL TELEPHONE COMPANY GROUP
REGARDING PROPOSED REVISION TO 4 CSR 240-18.010
SAFETY STANDARDS-ELECTRIC AND TELEPHONE UTILITIES
AND RURAL ELECTRIC COOPERATIVES

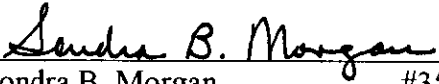
Comes now the Small Telephone Company Group (STCG), a group of small local exchange companies, members of which are set out in Appendix A, and for its Comments Regarding the Missouri Public Service Commission's (Commission) proposed revisions to 4 CSR 240-18.010, Safety Standards - Electric and Telephone Utilities and Rural Electric Cooperatives, states to the Commission as follows:

1. On October 1, 1999, the Commission's proposed revisions to 4 CSR 240-18.010, Safety Standards - Electric and Telephone Utilities and Rural Electric Cooperatives, were published in the Missouri Register. Comments regarding these proposed rules were to be filed on or before November 1, 1999.
2. The STCG offers the following comments regarding the proposed rule. In this rule, the Commission proposes to adopt certain provisions of the American National Standard, National Electric Safety Code (NESC). This proposed section is consistent with the recently revised 4 CSR 240-32.060, Engineering and Maintenance, also prescribing standards for design,

construction and operation of telecommunications facilities which also adopted portions of the NESC. There is one difference, however, which the STCG feels is significant. Paragraph (10) of 4 CSR 240-32.060 states that the company shall comply with the requirements of the rule "on a going forward basis." The STCG believes that this proposed revision should also state that it is effective only on a going forward basis.

The STCG appreciates the opportunity to comment on proposed rule 4 CSR 240-18.010.

Respectfully submitted,


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