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November 30, 2000

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

Re: Case No. TA-2001-251

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter on behalf of the Small Telephone Company Group, please find an original and eight copies of the Small Telephone Company Group's Reply to ExOp of Missouri, Inc.'s Response to Application to Intervene and Request for Hearing.

Please see that this filing is brought to the attention of the appropriate Commission personnel. Copies are today being provided to parties of record. I thank you in advance for your cooperation in this matter.

Sincerely,



W.R. England, III

WRE/lar
Enclosure
cc: Parties of Record

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Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application)
of ExOp of Missouri, Inc. for Designation)
as a Telecommunications Company)
Carrier Eligible for Federal) Case No. TA-2001-251
Universal Service Support Pursuant)
to Section 254 of the Telecommunications)
Act of 1996.)

SMALL TELEPHONE COMPANY GROUP'S REPLY TO
EXOP OF MISSOURI, INC.'S RESPONSE TO APPLICATION TO
INTERVENE AND REQUEST FOR HEARING

Comes now the Small Telephone Company Group ("STCG") and for its Reply to ExOp of Missouri, Inc.'s, ("ExOp") Response to Application to Intervene and Request for Evidentiary Hearing states to the Missouri Public Service Commission ("Commission") as follows:

1. ExOp objects to the STCG's application to intervene in this proceeding stating that ExOp's eligible telecommunications carrier ("ETC") status will not affect any of the member companies other than Spectra Communications Group, LLC ("Spectra"). ExOp does state in its Response that it is requesting the ETC designation for exchanges served by Spectra. Since Spectra is a member of the group, however, the STCG does clearly have an interest in this proceeding sufficient to justify intervention.

2. The STCG also supports the Office of Public Counsel's ("Public Counsel") request for an evidentiary hearing in this matter as ExOp has requested that the Commission designate it as an ETC throughout all of the exchanges for which it holds a certificate without any evidentiary basis.

3. The STCG does not dispute that, with the proper evidentiary support, it is possible for ExOp to be designated an ETC in those areas where it is actually providing telecommunications service and where it offers all of the services required by § 254(c) of the Telecommunications Act of 1996 ("the Act"). The STCG does object, however, to the request by ExOp for a blanket designation for the entire area where it is certificated, whether or not it is actually providing service. The STCG does not believe that ExOp can demonstrate to the Commission that it offers the services required for the designation in all of the areas where it is certificated nor can it show that it advertises the availability of such services and the charges for those services using media of general distribution as required by 47 C.F.R. § 54.201(d)(2).

4. ExOp states that since the Commission has granted ETC status to Mark Twain Communications Company ("Mark Twain") in Case No. TA-2000-591, it should grant the same status to ExOp. There are significant differences between the two applications, however. Mark Twain's application stated that its tariffed service area consisted of three Northeast Missouri exchanges, Ewing, LaBelle and Lewiston. Mark Twain filed a verified application stating that it provided all of the services required by § 254(c) of the Act. Additionally, Mark Twain attached affidavits of publication to the application showing that it advertised the availability of and charges for its services using media of general distribution within its service area.

Mark Twain did not ask for a blanket designation throughout the area where it was certificated, and it provided evidentiary support for its request through the verified application and the affidavits. ExOp has not provided this evidentiary support, as indeed it cannot, because it does not offer the required services throughout the area where it is seeking the ETC

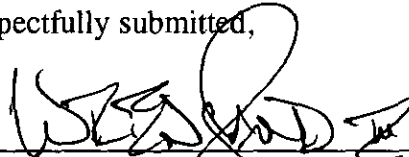
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designation nor has it advertised the availability of and charges for its services through the use of media of general distribution within its entire certificated area. Instead, ExOp is asking the Commission to grant the designation to all of the areas in the state where it might ever want to provide service without any proof that it has met the requirements of 47 C.F.R. 54.201(d).

The STCG does not believe that the Commission should grant the ETC status to ExOp unless its request is narrowed to the area where it is actually providing service and where it can demonstrate that it actually meets the requirements for that status. The designation cannot be granted in a vacuum without some evidentiary showing.

Wherefore, the STCG respectfully requests that the Commission grant its Application to Intervene and grant the Office of Public Counsel's Request for an Evidentiary Hearing.

Respectfully submitted,



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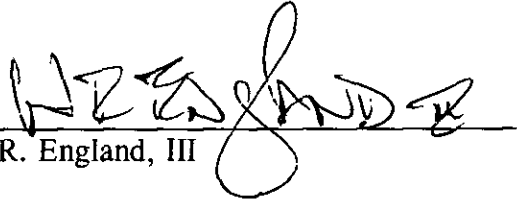
Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed, United States Mail, postage prepaid, this 30th day of November, 2000, to:

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