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October 13, 1999

FILED³

OCT 13 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: Case No. TA-2000-204

Dear Mr. Roberts:

Enclosed please find the original plus fourteen (14) copies of Application to Intervene 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. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: *Sandra Morgan*
Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
Harry L. Thielepape
Dan Joyce
Bob Schoonmaker

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

OCT 13 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)
Telecommunications Service and Long)
Distance Service in the State of Missouri)
and to Classify Said Services and Missouri)
State Discount Telephone as Competitive.)

Case No. TA-2000-204

APPLICATION TO INTERVENE

Come now the Small Telephone Company Group, which companies are set out in Attachment A, (hereinafter referred to as "Applicants") 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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W. R. England, III
Sondra B. Morgan
Brydon, Swearengen & England P.C.
P.O. Box 456
Jefferson City, Missouri 65102
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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. On September 14, 1999, the Commission issued its Order and Notice setting an intervention deadline of October 14, 1999.

5. The Small Telephone Company Group 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 Small Telephone Company Group 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.

Respectfully submitted,

Sandra B. Morgan
W. R. England, III MoBar #23975
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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, United States Mail, postage prepaid, this 13 th day of October, 1999, to:

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

Dan Joyce
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Harry L. Thielepape
804 Elkins Lake
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Sandra B. Morgan
Sondra B. Morgan

SMALL TELEPHONE COMPANY GROUP

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

ATTACHMENT A