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Missouri Public Service Commission

7 1998

DEC

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

Re: TO-99-227

Dear Secretary Roberts:

Please find enclosed an original and 14 copies of the Application of Mid-Missouri Group to Intervene in the above referenced docket. I have mailed a copy of same to all counsel of record.

Thank you for seeing this filed.

Sincerely, Craiq Johnson [©]

CSJ:skl Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Southwestern Bell's Application/Notice of InterLATA Authority

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<u>Case No. TO-99-227</u>

FILE

Missouri Public Service Commission

DEC

APPLICATION OF MID-MISSOURI GROUP TO INTERVENE

COMES NOW the Mid-Missouri Group of Local Exchange Telephone Companies, (ALMA Telephone Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company, Modern Telephone Co, MoKan Dial Inc., Northeast Missouri Rural Telephone Company, and Peace Valley Telephone Company, hereinafter the "Mid-Missouri Group") hereby applies to intervene in this docket. 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, P.O. Box 1438, Jefferson City, Missouri, 65102, Telephone 573-634-3422, Fax Number 573-634-7822.

 The Mid-Missouri Group has been allowed to intervene in similar prior and pending proceedings, including TO-97-56, TA-99-47.

3. On or about November 20, 1998, Southwestern Bell Telephone Company (SWBT) filed its Application to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri.

4. The Mid-Missouri Group seeks to intervene in the

proceeding because the Commission's decision may affect the Mid-Missouri Group's interests as a provider of interexchange telecommunications services. The Mid-Missouri Group opposes the application.

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5. The Mid-Missouri Group's interests as a telecommunications company are different from those of the general public. Furthermore, the Mid-Missouri Group's intervention in this proceeding is in the public interest because of the Mid-Missouri Group's interests in enhancing competition, and because of its expertise in the telecommunications industry.

6. The Mid-Missouri Group is not opposing or supporting the Application, but are monitoring it to ensure that all federal and state legal and regulatory requirements are met to make sure that the Mid-Missouri Group companies and customers' interests are protected.

WHEREFORE, on the basis of the foregoing, the Mid-Missouri Group respectfully requests that it be granted leave to intervene in this proceeding and request that a hearing be conducted in these regards.

ANDERECK, EVANS, MILNE PEACE & BAUMHOER BY S. Johnson Mo Bar #28179 308 East McCarty Street Third Floor - Hawthorn Center Post Office Box 1438 Jefferson City, Missouri 65102 (573) 634-3422 Telephone: Facsimile: (573) 634 - 7822

ATTORNEYS FOR MID-MISSOURI GROUP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the Application to Intervene was mailed first class, postage prepaid this 47^{12} day of December, 1998, to all attorneys of record.

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