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July 15, 1999

FILED

JUL 15 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-2000-16

Dear Mr. Roberts:

Enclosed for filing with the Commission, please find an original and fourteen (14) copies of the Concurrence of the Small Telephone Company Group in the Motion of the Mid-Missouri Group to Establish Docket.

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 (Case No. TO-99-254)

SMALL TELEPHONE COMPANY GROUP (STCG)

Alltel Missouri Inc.
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 Corp.
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM 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 Co.
Ozark Telephone Company
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

APPENDIX A

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUL 15 1999

Missouri Public
Service Commission

In the Matter of the Motion to)
Establish a Docket Investigating the)
intraLATA Toll Service Provisioning)
Practices of Missouri Interexchange)
Carriers, Public Utility or Common)
Carrier Duties of Interexchange)
Carriers, Motion to Show Cause,)
Request for Emergency Hearing,)
and Alternative Petition for)
Suspension and Modification.)

Case No. TO-2000-16

CONCURRENCE OF SMALL TELEPHONE COMPANY GROUP
IN THE MOTION OF THE MID-MISSOURI GROUP TO
ESTABLISH DOCKET

Comes now the Small Telephone Company Group (STCG), members of which are listed on Appendix A attached hereto, and for its concurrence in the motion of the Mid-Missouri Group to establish a docket to investigate the intraLATA toll service provisioning practices of Missouri interexchange telecommunications companies (IXCs) and to establish common carrier duties of IXCs with respect to service obligations in both the intrastate intraLATA and the intrastate interLATA markets states to the Missouri Public Service Commission (Commission) as follows:

1. On or about July 9, 1999, the Mid-Missouri Group of Local Exchange Companies (MMG) filed its Motion to Investigate IXC IntraLATA Toll Service Provisioning Practices, to Establish Public Utility/Common Carrier Duties of IXCs, Motion for AT&T to Show Cause, and Alternative Petition for Suspension and Modification in the above referenced matter. Among other things, the MMG motion asked the Commission to establish a docket to investigate the intraLATA toll service provisioning practices of Missouri Interexchange Telecommunications Companies and to establish common carrier duties of IXCs with respect to service obligations in both the intrastate intraLATA and the intrastate interLATA market. The STCG files its

concurrence in MMG's motion because it shares many, if not all, of the same concerns raised by the MMG in its motion.

2. For example, the MMG correctly notes that the Commission directed a number of small telephone companies to send notice to their customers of the implementation of intraLATA dialing parity. Said notice contained a footnote indicating that although AT&T was not on the list of available carriers, it would nevertheless provide service if the customer requested it. This directive was consistent with the sworn testimony of AT&T representatives in Case No. TO-99-254 et al. However, subsequent to the Commission's issuance of a Report and Order in that case, AT&T informed the Commission through a motion for rehearing that it had changed its mind and was now unwilling to provide 1+ intraLATA service to customers of Secondary Carriers, even if those customers directly requested service from AT&T.

3. AT&T's "new" position has been further articulated in the letter attached to the MMG motion. This letter was also sent to member companies of the STCG. Obviously, the customer notice as required by the Commission and the position now taken by AT&T, as evidenced by the July 1, 1999 letter of Ms. Fran Gramiccioni, are inconsistent, and customers of the STCG are experiencing many of the same (or similar) responses from AT&T customer service representatives as are customers of the MMG member companies as set forth in paragraph 7 of its motion. The STCG agrees with MMG that these responses are inconsistent and/or inaccurate. The result is, at best, customer confusion and, at worst, customer frustration and anger. Accordingly, action needs to be taken by the Commission to reconcile its directive regarding implementation of intraLATA dialing parity with AT&T's "new" position.

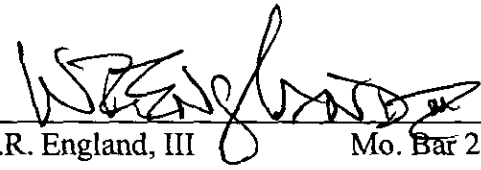
4. The STCG agrees with the MMG that AT&T is apparently discriminating against

small companies by refusing to provide the same services to customers of small companies that it is providing to customers of other local exchange companies, such as Sprint Missouri Inc. and GTE, who are similarly situated. It appears that AT&T is engaging in a form of "redlining" when it comes to providing service in small company exchanges.

5. The STCG also agrees with MMG that AT&T is the "strategy and price" leader and that other IXCs tend to follow AT&T's lead. Thus, the STCG (like the MMG) is concerned that over the long term other large IXCs such as MCI WorldCom and Sprint will follow AT&T's "lead" and exit rural markets as well, thus putting in jeopardy the goal of providing parity among services and prices provided in rural and urban markets.

WHEREFORE, the STCG concurs with MMG's motion to establish docket to investigate the intraLATA toll service provisioning practices of Missouri Interexchange Telecommunications Companies and to establish common carrier duties of IXCs with respect to service obligations in both the intrastate intraLATA and the interstate intraLATA markets.

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, or hand-delivered, this 5th day of July, 1999, to the following:

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