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SEP 03 1997

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Mr. Cecil Wright  
Missouri Public Service Commission  
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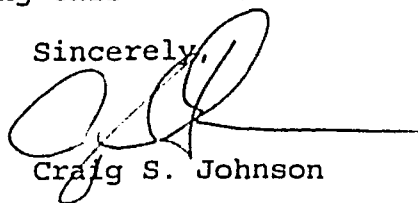
Re: Case No. TO-98-49

Dear Mr. Wright:

Enclosed please find a Response to Applications to Intervene of MCI and United Telephone Company. Copies of this letter and enclosures have been sent to all attorneys of record.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ/krm/Enc.

cc: Carl Lumley/Leland Curtis  
Stephen Morris  
General Counsel  
Office of Public Counsel  
W. R. England/Sondra Morgan  
Linda Gardner  
Mid-Missouri Managers

FILED

SEP 03 1997

MISSOURI  
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of the )  
Mid-Missouri Group and the Small )  
Telephone Company Group of )  
Incumbent Local Exchange Companies )  
for Designation as Telecommunications )  
Company Carriers Eligible for Federal )  
Universal Service Support pursuant to )  
§ 254 of the 1996 Telecommunications Act. )

Case No. TO-98-49

RESPONSE TO APPLICATIONS TO INTERVENE  
OF MCI AND UNITED TELEPHONE COMPANY

In response to the Applications to Intervene of MCI and United Telephone Company, the Mid-Missouri Group states as follows:

1. The purpose of the Small Company's Application for designation as eligible carriers for Federal USF purposes was merely to continue their eligibility as such. It is our understanding of the designation that it will not affect the nature, extent, or manner in which Federal USF is distributed to carriers designated as eligible carriers.

2. In their Application, the Mid-Missouri Group and Small Telephone Company Group attempted to meet the Application requirements in a manner obviating the necessity of a formal hearing.

3. Neither United nor MCI's Application to Intervene have stated whether they support or oppose the relief sought by the Small Companies, as is technically required by 4 CSR 240-2.075.

4. Without a more specific statement of their reasons for intervening, the Commission and administrative law judges assigned to this case will not be able to make the determination of whether

... a hearing is required in this case. In order to make that determination, it is necessary that United and MCI state whether they oppose the designation as eligible carriers, or whether they oppose any aspects of the Application itself. Without such a designation, it will be difficult to intelligently and efficiently proceed to hearing.

WHEREFORE, the Mid-Missouri Group respectfully requests that the Commission issue an Order either denying the Applications to Intervene, or asking that the Applications be stated with sufficient particularity so as to allow efficient and focused future proceedings.

ANDERECK, EVANS, MILNE,  
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By 

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ATTORNEYS FOR MID MISSOURI GROUP

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was mailed via U.S. mail, postage prepaid, this 3 day of September, 1997, to:

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• Stephen Morris  
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