

**BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI**

In the Matter of an Investigation into	)	
Various Issues Related to the Missouri	)	Case No. TO-98-329
Universal Service Fund.	)	

**Application to Intervene of  
The Missouri Independent Telephone Company Group**

Come now the Missouri Independent Telephone Company Group (MITG), consisting of Alma Communications Company d/b/a Alma Telephone Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company d/b/a Otelco, MoKan Dial Inc., and Northeast Missouri Rural Telephone Company, pursuant to the Commission's March 8, 2007 Order and Notice, and for their Application to Intervene/Participate in this proceeding, and state as follows:

1. The individual MITG companies are incumbent local exchange companies. The MITG companies have been involved at all levels of proceedings in this Missouri Universal Service Fund (MoUSF) docket since 1997, including proceedings in which the low income/disable portions of the MoUSF were implemented. The MITG companies have been granted intervention several years ago in this docket, and have continually been considered parties hereto.

2. The MITG companies are not opposed to the relief requested in Staff's March 8, 2007 Motion for Commission Order Regarding Assessment and Motion for Expedited Treatment, or in Staff's Recommendation Regarding Assessment Adjustment Implementation and Motion to Modify Reimbursement Procedures.

3. The MITG companies are in favor of an increased assessment percentage, assuming one is necessary, that is sufficient to sustain operations of the fund, and sufficient to maintain an adequate reserve for contingencies such as the one giving rise to this phase of this docket.

4. The MITG companies ask that the effective date of any new assessment percentage be scheduled for a specific date after the order imposing the assessment percentage to allow for implementation in billing systems without having to redo or “backbill” end users for the increased rate. Typically, MITG end user billing information is compiled in advance of the billing period. The end user bill typically includes both local service and toll service. The local service, which includes the MoUSF assessment, is billed in advance, whereas usage specific toll, with call detail, is billed after the fact.

5. If, for example, the Commission on April 15, 2007 directed the new assessment percentage to be effective on May 1, 2007, but an MITG company had already sent its May local billing information utilizing the previous assessment percentage, either the billing would have to be pulled (if not mailed) and redone, or the June local billing would have to “backbill” the difference in the old and new assessment percentage for May.

6. In order to minimize the prospect of customer confusion and avoid undue administrative attention to the customer inquiries that this type of backbilling engenders, the MITG companies request adequate advance notice of the effective date of a new assessment percentage.

7. The MITG agrees that customers should be notified of the change in assessment percentage, and that the notice should either precede or accompany the first bill in which the new percentage is applied.

8. The MITG has reviewed Staff's March 12, 2007 Recommendation Regarding Assessment Adjustment Implementation and Motion to Modify Reimbursement Procedures. Subject to the MITG position regarding an adequate notice and opportunity or time frame to implement a new assessment rate without backbilling, as set forth in paragraphs 4, 5, 6, and 7 above, the MITG companies are not opposed to the effective date of the new assessment coinciding with each carrier's next billing cycle. The MITG companies are not opposed to Staff's suggested change to the reimbursement date.

9. Copies of all filings in this docket should be directed to the MITG by serving:

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1648-A East Elm St.  
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10. As set forth above, the interests of the MITG companies are different from those of the general public.

11. Permitting the MITG companies continued participation as parties is in the public interest.

WHEREFORE, on the basis of the foregoing, the MITG companies respectfully request that they be allowed to intervene and participate in this phase of this proceeding in this docket.

/s/ Craig S. Johnson  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this pleading was electronically mailed to the following attorneys of record in this proceeding this 13th day of March, 2006:

David Meyer  
Michael Dandino

/s/ Craig S. Johnson  
Craig S. Johnson