

WILLIAM D. STEINMEIER, P.C.

2031 TOWER DRIVE

JEFFERSON CITY, MISSOURI (MO) 65109

WILLIAM D. STEINMEIER
ATTORNEY AT LAW
GOVERNMENTAL CONSULTANT
(573) 659-8672
FAX (573) 636-2305

MAILING ADDRESS:
POST OFFICE BOX 104595
JEFFERSON CITY, MISSOURI (MO)
65110-4595

MARY ANN YOUNG
ATTORNEY AT LAW
OF COUNSEL
(573) 634-8109
FAX (573) 634-8224

January 6, 2003

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P. O. Box 360
Jefferson City, MO 65102-0360

FILED³

JAN 06 2003

Missouri Public
Service Commission

RE: Case No. CO-2003-0094
**The Pager Company's Application for Designation as an Eligible
Telecommunications Carrier for Federal Lifeline and LinkUp Programs**

Dear Secretary:

Enclosed please find an original and eight copies of the **RESPONSE IN
OPPOSITION TO APPLICATION TO INTERVENE OF SMALL TELEPHONE COMPANY
GROUP** for filing with the Commission on behalf of The Pager Company in the above-
referenced case.

Thank you for assistance in the processing this filing. Copies are being served on
the Commission's General Counsel, the Office of the Public Counsel, and counsel for the
Small Telephone Company Group. Please contact me at 634-8109 if there are any
questions.

Sincerely,



Mary Ann (Garr) Young

Enclosure

cc: General Counsel
Office of the Public Counsel
Sondra Morgan, Brydon Swearngen
Mark Foster, Foster & Malish
Dale Schmick, PagerCo

FILED³

JAN 06 2003

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of the Application of)
The Pager Company dba)
The Pager & Phone Company)
for Designation as a Telecommunications)
Carrier Eligible for Federal Universal)
Service Support pursuant to Section 254)
of the Telecommunications Act of 1996)

Case No. CO-2003-0094

**RESPONSE IN OPPOSITION TO APPLICATION TO INTERVENE
OF SMALL TELEPHONE COMPANY GROUP**

Comes now The Pager Company dba The Pager & Phone Company ("PagerCo"), by its undersigned counsel, and hereby files its Response in Opposition to Application to Intervene of Small Telephone Company Group. In support hereof, PagerCo states:

1. The Small Telephone Company Group (STCG) and its member companies have not shown that they have an interest different from the general public which may be adversely affected by a final order in this case and thus do not have grounds for intervention in this matter (4 CSR 240-2.075). The STCG and its members would not be affected by any final order in this matter, and therefore the Commission should deny intervention.

2. The area in which PagerCo seeks ETC designation is limited to exchange served by Southwestern Bell Telephone Company (SWBT), as stated in the Amended Application filed herein on November 8, 2002, and further clarified in PagerCo's Supplement to Amended Application filed on December 19. The December 19 Supplement listed the specific exchanges in which it sought ETC designation, namely:

Ash Grove
Camdenton
Carl Junction
Clever
Excelsior Springs

Grain Valley
Harrisonville
Kansas City MCA Metro
Richmond

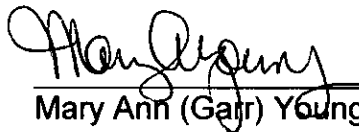
Sedalia
Smithville
Springfield MCA
St. Joseph

PagerCo reiterates herein that it does not seek ETC designation in any area currently served by a small ILEC, but only in exchanges served by SWBT. Thus, none of the members of the STCG will be affected by the Commission's decision in this matter.

2. Designation of PagerCo as an ETC is not premature, as PagerCo has shown its ability to provide services required by an ETC immediately upon designation.

WHEREFORE, Applicant The Pager Company dba The Pager & Phone Company respectfully requests the Commission deny the Small Telephone Company Group's Application to Intervene in this matter.

Respectfully submitted,



Mary Ann (Garr) Young Mo. Bar #27951
WILLIAM D. STEINMEIER, P.C.
2031 Tower Drive, P.O. Box 104595
Jefferson City MO 65110-4595
Phone: 573-634-8109
Fax: 573-634-8224
Email: myoung0654@aol.com

COUNSEL FOR THE PAGER COMPANY dba
THE PAGER & PHONE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid to the Office of Public Counsel, the General Counsel of the Missouri Public Service Commission, and counsel for the Small Telephone Company Group on this 6th day of January 2003.



Mary Ann (Garr) Young