ANDERECK, EVANS, MILNE, PEACE & BAUMHOER, L.L.C.

ATTORNEYS AT LAW

305 EAST MCCARTY STREET

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

TRENTON OFFICE 91H AND WASHINGTON STREET P.O. BOX 547 TRENTON, MISSOURI 64683-0547 816-359-2244

FAX 816-359-2116

SPRINGFIELD OFFICE 1111 S. GLENSTONE P.O. BOX 4929 SPRINGFIELD, MISSOURI 65808-4929 417-864-6401 FAX 417-864-4967

PRINCETON OFFICE 807 NORTH WASHINGTON PRINCETON, MISSOURI 64673 816-748-2244

SMITHVILLE OFFICE 119 E. MAIN STREET P.O. BOX 654 SMITHVILLE, MISSOURI 64089 816-532-3895 FAX 816-532-3899

August 20, 1998

Mr. Dale Har

EUGENE E. ANDERECK

PATRICK A. BAUMHOER

CRAIG S. JOHNSON

RODRIC A. WIDGER

BEVERLY J. FIGG

CARL E. LIPPELMAN

LESLEY A. RENFRO

COREY K. HERRON

DAVID R. MERCER

MARVIN L. SHARP

(1904-1993)

OF COUNSEL

MATTHEW M. KROHN

GREGORY C. STOCKARD

PHIL HAUCK (1924-1991)

WILLIAM S. LEWIS

GEORGE M. JOHNSON

PEGGY D. RICHARDSON

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

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

Re: TA-99-47

Dear Secretary Roberts:

AUG 2 0 1998

Missouri Public Service Commission

Enclosed please find an original and 14 copies of the Mid-Missouri Group's Application to Intevene in the above referenced case. A copy of this letter and a copy of the enclosures have been served upon attorneys for Southwestern Bell Communication Services, as well as General Counsel, and Office of Public Counsel.

Thank you for seeing this filed.

Sincerely,

Craig S. Johnson

CSJ/krm/Enc.

cc: John Lube

James Fischer
Daniel Joyce
Martha Hogarty
Trip England

Mid Missouri Group Managers

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

In the matter of the application of Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance for a Certificate of Service Authority to provide Interexchange Telecommunications Services within the State of Missouri.

COMMISSION
SOURI

AUG 20 1998

Commission

Commission

Case No. TA-99-47

## APPLICATION TO INTERVENE

COMES NOW the Mid-Missouri Group of local exchange companies, Alma Telephone Company, Chariton Valley Telephone Company, Choctaw Telephone Company, Mid-Missouri Telephone Company, Modern Telecommunications Inc., MoKan Dial Inc., Northeast Missouri Rural Telephone Company, and Peace Valley Telephone Company, and for their Application to Intervene sets forth as follows:

- 1. On August 4, 1998, Southwestern Bell filed this Application for certification of its interexchange affiliate Southwestern Bell Long Distance to have interexchange or long distance toll authority in the State of Missouri.
- 2. As referenced in that Application, this is one in a series of steps by which Southwestern Bell Telecommunications will obtain interLATA interexchange service authority, in addition to its present intraLATA interexchange service authority.
- 3. As local exchange company providers, and also in their capacity as potential toll providers under the Commission's Orders regarding the PTC Plan and Origination Responsibility Plan, applicants have an interest that is different than that of the

general public in this proceeding, to wit they are interested in the terms and conditions under which Southwestern Bell, the dominant incumbent lec in Missouri, enters into the competitive intraLATA toll market, and as well as other issues that may arise with respect to carrier access equality, and parity.

4. All communications, correspondence, or pleadings pertaining to this Application to the intervenors should be addressed to:

Craig S. Johnson Andereck, Evans, Milne, Peace & Baumhoer P. O. Box 1438 Jefferson City, Missouri 65102 Telephone: 573-634-3422 Facsimile: 573-634-7822

5. Applicants are not opposed to or in support of the Application at this stage, or in the related tariff filings or related Section 271 proceedings which will be entertained; however, applicants to intervene are interested these matters in total, and therefore are interested in this particular Application.

WHEREFORE, in the basis of the foregoing, the Mid-Missouri Group respectfully requests that they be granted leave to intervene and participate as parties in this case.

ANDERECK, EVANS, MILNE PEACE & BAUMHOER, L.L.C.

Craig S. Johnson MO Bar #28179 301 East McCarty Street

Hawthorn Building - 3rd Floor Post Office Box 1438

Jefferson City, Missouri 65102

Telephone: (573) 634-3422 Facsimile: (573) 634-7822

ATTORNEYS FOR MID-MISSOURI GROUP

## CERTIFICATE OF SERVICE

The undersigned hereby co	ertifies that a true and correct cor	ΣУ
	l first class, postage prepaid thi	
20 day of Noust	, 1998, to all attorneys o	ρf
record.	<u> </u>	
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