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June 30, 1997

FILED
JUN 3 0 1997
PUDLIC SERVICE COMMISSION

Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. TO-97-523

Dear Mr. Wright:

Enclosed for filing on behalf of the Small Telephone Company Group, Fidelity Telephone Company and Bourbeuse Telephone Company in the above-referenced matter, please find an original and fourteen copies of their Application to Participate without Intervention. Please see that this is brought to the attention of the appropriate Commission personnel. If there are any questions regarding the attached, please feel free to give me a call. I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

Soudie B. Margan

By:

Sondra B. Morgan

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cc: All Parties of Record

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BEFORE



## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Joint Application of Southwestern Bell	)	
Telephone Company and Ameritech	)	
Mobile Communications, Inc. for	)	Case No. TO-97-523
Approval of Resale Agreement under the	)	
Telecommunications Act of 1996.	)	

# THE SMALL TELEPHONE COMPANY GROUP'S AND FIDELITY'S APPLICATION TO PARTICIPATE

Comes now the Small Telephone Company Group, members of which are set out in Attachment A, Fidelity Telephone Company and Bourbeuse Telephone Company (hereinafter "Fidelity") (both the Small Telephone Company Group and Fidelity are sometimes collectively referred to as "Applicants") and in support of their Application to Participate Without Intervention in the above-captioned matter state that:

1. Applicants currently provide telecommunication services to members of the public located in those areas certificated to them by the Missouri Public Service Commission ("Commission"). As is relevant to this case, Applicants provide "local telecommunication services" within the exchanges as defined by their respective tariffs which are on file with and approved by the Commission. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by Section 386.020, RSMO 1994, and are, therefore subject to the jurisdiction, regulation and control of the Commission as provided by law. Applicants also are rural telephone companies and incumbent local exchange carriers as defined by the Federal Telecommunications Act of 1996 (the "Act").

 All correspondence, communications, orders and decisions in this matter should be addressed to the following:

> W.R. England, III Sondra B. Morgan Brydon, Swearengen & England, P.C. P.O. Box 456 Jefferson City, Missouri 65102 (573) 635-7166

- 3. On June 4, 1997, Southwestern Bell Telephone Company ("SWBT") and Ameritech Mobile Communications, Inc. ("Ameritech") filed an Application with the Commission for approval of an interconnection agreement. The Application was filed for approval under the provisions of the Act, and the parties state that the agreement complies with § 252(e) of the Act, is not discriminatory and is consistent with the public interest.
- 4. On June 9, 1997, the Commission issued its Order and Notice in the instant docket.

  This order, among other things, established a deadline for the filing of applications to participate without intervention and the filing of written comments.
- 5. Applicants have obtained a copy of the interconnection agreement but, as of the filing of this application, have not had time to thoroughly review its contents and provisions. Nevertheless, Applicants file this Application because of their concerns that the interconnection agreement may have an impact on their operations and/or their existing relationships with SWBT. More specifically Applicants are concerned with the effect, if any, the proposed interconnection agreement with a wireless carrier may have upon agreements with other local exchange companies in light of SWBT's recent tariff filing designed to revise its Wireless Carrier Interconnection Service. Applicants, therefore, have an interest in this proceeding which is different from that of the general public. Applicants' expertise in and perspective on the provision of telecommunications services in the state

will also aid the Commission in determining whether or not the proposed interconnection agreement

1) discriminates against another telecommunication carrier or 2) is consistent with the public interest,
convenience and necessity. Consequently, Applicants participation in this docket will serve the
public interest.

WHEREFORE, the Small Telephone Company Group and Fidelity respectfully request that the Commission issue an Order authorizing them to participate without intervention in the above captioned proceeding and for such other orders as are reasonable in the circumstances.

Respectfully Submitted,

W.R. England, III Mo. Bar #23975

Sondra B. Morgan Mo. Bar #35482

Brydon, Swearengen & England, P.C.

P.O. Box 456

Jefferson City, MO 65102

Attorneys for The Small Telephone Company Group and Fidelity

### 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, this 30d day of June, 1997, to the following:

Anthony Conroy 100 N. Tucker Room 630 St. Louis, MO 63101-1976

Dennis Myers 2000 West Ameritech Center Drive 3H78 Hoffman Estates, Illinois 60195-5000

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Missouri Public Service Commission P.O. Box 456 Jefferson City, MO 65102

W.R. England, III/Sondra B. Morgan

### SMALL TELEPHONE COMPANY GROUP

**BPS Telephone Company** Cass County Telephone Company Citizens Telephone Company of Higginsville, Missouri, Inc. Craw-Kan Telephone Cooperative, Inc. Ellington Telephone Company Grand River Mutual Telephone Cooperation Green Hills Telephone Corporation Holway Telephone Company Iamo Telephone Company Kingdom Telephone Company KLM Telephone Company Lathrop 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 Company Steelville Telephone Exchange, Inc. Stoutland Telephone Company