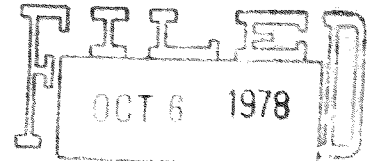


WILLIAM R. ENGLAND III
ATTORNEY AT LAW
HAMMOND BUILDING
312 E. CAPITOL AVENUE
JEFFERSON CITY, MISSOURI 65101
TELEPHONE (314) 636-8101

October 6, 1978

Mr. R. Michael Jenkins, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102



PUBLIC SERVICE COMMISSION

Re: Case No. TA-79-66, Application of
Control Center, Inc.

Dear Mr. Jenkins:

Enclosed please find an original and nine (9) copies of
a Petition to Intervene on behalf of Capital City Telephone Company.

Copies of this Petition have been sent to all parties
of record.

Yours very truly,

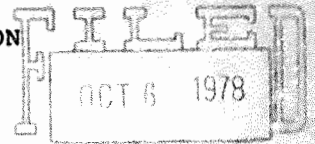
W. R. ENGLAND III
W. R. ENGLAND III

WRE:slr

Enclosures

cc: Mr. Wm. Barvick, Public Counsel
Mr. Charles B. Fain
Mr. D. H. Zehnder
Mr. George Hartsfield
Mr. Richard Brownlee III

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI



PUBLIC SERVICE COMMISSION

In the matter of the Application
of CONTROL CENTER, INC., for a
Certificate of Convenience and
Necessity to operate a non-
interconnected paging service.

)
)
) Case No. TA-79-66
)
)

PETITION TO INTERVENE

Comes now Capital City Telephone Company and for its
Petition to Intervene, states:

1. Petitioner is a Missouri corporation with its
principal office and place of business located at 319 Madison St.,
Jefferson City, Missouri 65101. Petitioner is a "telephone corporation"
as that term is defined by Section 386.020 RSMo 1969, as amended, and
provides telephone as well as other types of communication services
to persons in Jefferson City and surrounding communities. Petitioner
is a telephone company subject to the jurisdiction of the Missouri
Public Service Commission pursuant to Section 386.250, RSMo 1969,
as amended.

2. Petitioner's interest therein differs from that of
the general public in that it is currently operating as a regulated
telephone corporation and requests to be made a party, with the right
to participate fully herein in opposition to granting of the Certificate
of Public Convenience and Necessity.


3. Petitioner's intervention herein will serve the general
public interest.

4. Notices, communications and orders should be directed
to:

1. Wm. R. England, III
Attorney at Law
Hammond Building
312 East Capitol
Jefferson City, Mo. 65101
2. D. H. Zehnder
Vice President & General Manager
Capital City Telephone Co.
311 Ellis Blvd.
Jefferson City, Mo. 65101

3. George Hartsfield
United Telephone Company
614 Central Trust Building
Jefferson City, Missouri 65101

WHEREFORE, Petitioner prays to be permitted to intervene in this cause as a party; and further prays that Petitioner be permitted to participate in all further proceedings herein.



W. R. ENGLAND III
Attorney at Law
Hammond Building
312 East Capitol
Jefferson City, Mo. 65101
Telephone (314) 636-8101

Attorney for Petitioner, Capital City
Telephone Co.

CERTIFICATE OF SERVICE

I hereby certify that I have forwarded a copy of the foregoing Petition to Intervene to Mr. Charles B. Fain, 333 Madison St., Jefferson City, Missouri, attorney for the Applicant, this 6th day of October, 1978.



W. R. ENGLAND III