

**HENDREN AND ANDRAE**

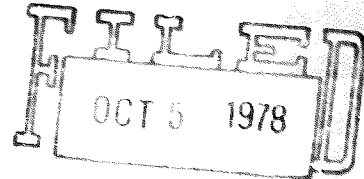
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JOHN H. HENDREN  
HENRY ANDRAE  
CHARLES H. HOWARD (1928-1970)  
JOHN E. BURRUSS, JR.  
ALEX BANTLETT  
KELLY POOL  
RICHARD S. BROWNLEE II  
MICHAEL A. BALLMEYER

October 5, 1978



PUBLIC SERVICE COMMISSION

Mr. R. Michael Jenkins, Secretary  
Missouri Public Service Commission  
Jefferson Building  
Jefferson City, Missouri 65101

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

Dear Mr. Jenkins:

Enclosed please find original plus six copies of  
a Petition to Intervene in the above captioned matter.

Very truly yours,

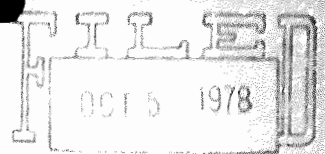
HENDREN AND ANDRAE

By: *Richard S. Brownlee*

RSB:sw

cc: Mr. Bill Troth  
Mr. Charles B. Fain  
Mr. Wm. M. Barvick  
Mr. Don H. Zehnder  
Mr. Tripp England

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 ) Case No. TA-79-66  
Necessity to operate a non- )  
interconnected paging service. )

PETITION TO INTERVENE

Comes now Central Mobilphone, Inc., a corporation, and  
for its Petition to Intervene, states:

1. Petitioner is a Missouri corporation with its principal office and place of business located at 604 Nebraska, Columbia, Missouri 65201. It holds a Certificate of Public Convenience and Necessity from this Commission to provide certain common carrier service as a radio common carrier (R.C.C.) in the State of Missouri, that being within a 65-mile radius of Jefferson City, Missouri, and a 50-mile radius of Columbia, Missouri; as further licensed and approved by the Federal Communications Commission (F.C.C.) to provide one-way paging under Station KEK297 and mobile telephone service under Station KBM519.

2. Petitioner's interest herein differs from that of the general public; petitioner's intervention will serve the public interest in general; and petitioner is opposed to the granting of the authority sought herein as petitioner is presently rendering all of the service proposed to be rendered by applicant.

3. The ground for petitioner's proposed intervention is because of petitioner's interest as hereinabove set forth. Petitioner desires an opportunity to participate in the determination of the following issues:

a. The issue as to whether or not public convenience and necessity will be promoted by the service proposed.

b. The issue of whether or not there is a public need for the service proposed.

c. The issue as to whether or not applicant is qualified properly to perform the service proposed.

d. The issue as to whether or not applicant is qualified to conform to the provisions of Section 392.010, RSMo.

e. The issue as to whether or not applicant is qualified to conform to the requirements, rules and regulations of this Commission.

f. The issue as to the effect the proposed service may have upon presently existing R.C.C.s.

g. The issue as to whether applicant has been operating illegally as an R.C.C. providing service to the general public, without benefit of a certificate of public convenience and necessity from this Commission.

h. Such other issues as may become apparent from such evidence as may be adduced by the parties upon the hearing of this cause.

WHEREFORE, petitioner prays to be permitted to intervene in this cause as a party protestant and to participate in all future proceedings in said cause.

HENDREN AND ANDRAE

By Richard S. Brownlee III  
 Richard S. Brownlee III  
 Central Trust Building  
 P.O. Box 1069  
 Jefferson City, MO 65102

Attorneys for Petitioner  
 Central Mobilphone, Inc.

#### CERTIFICATE OF MAILING

I hereby certify that I served a true copy of the foregoing Petition to Intervene upon the applicant by mailing a true copy thereof on October 5, 1978, by prepaid United States mail, to Don Krattli, President, Control Center, Inc., 227 Capitol Avenue, Jefferson City, MO 65101; Charles B. Fain, Fain & Fain, 333 Madison Street, Jefferson City, MO 65101; William M. Barvick, Public Counsel, P.O. Box 1216, Jefferson City, MO 65102; Donald H. Zehnder, Vice President and General Manager, United Telephone Company of Missouri, 311 Ellis Boulevard, Jefferson City, MO 65101, the attorneys of record for all parties.

Richard S. Brownlee III  
 Richard S. Brownlee III