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November 13, 2000

FILED²
NOV 13 2000
Missouri Public
Service Commission

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

**Re: In the Matter of the Application of ExOp of Missouri, Inc. for Designation as a
Telecommunications Company Carrier Eligible for Federal Universal Service Support
Pursuant to Section 254 of the Telecommunications Act of 1996; Case No. TA-2001-251**


Dear Mr. Roberts:

Enclosed please find the original plus eight (8) copies of Application to Intervene for filing on behalf of The Small Telephone Company Group in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 
Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
General Counsel - PSC
Kristine Becker
Peter Mirakian, III

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

NOV 13 2000

Missouri Public
Service Commission

In the Matter of the Application)
of ExOp of Missouri, Inc. for Designation)
as a Telecommunications Company)
Carrier Eligible for Federal)
Universal Service Support Pursuant)
to Section 254 of the Telecommunications)
Act of 1996.)

Case No. TA-2001-251

APPLICATION TO INTERVENE

Comes now the Small Telephone Company Group, which companies are set out in Attachment A, (hereinafter referred to as "Applicant") and in support of its Application to Intervene in the above-captioned matter states that:

1. The member companies of the Applicant currently provide telecommunications 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, the member companies provide "basic local telecommunications services" within the exchanges as defined by their respective tariffs which are on file with and approved by the Commission. The companies are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020, RSMo 1994, and are, therefore, subject to the jurisdiction, regulation and control of the Commission as provided by law. The companies also are rural telephone companies and incumbent local exchange carriers as defined by the Federal Telecommunications Act of 1996 (the "Act").

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

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3. On October 17, 2000, ExOp of Missouri, Inc. ("ExOp") filed an Application requesting designation as an eligible telecommunications carrier ("ETC") pursuant to Section 254 of the Telecommunications Act of 1996.

4. On October 23, 2000, the Commission issued its Order Directing Notice setting an intervention deadline of November 13, 2000.

5. The Small Telephone Company Group files this Application to Intervene in the instant proceeding on the grounds that the grant of eligible telecommunications carrier designation to ExOp may affect the member companies and their ability to provide telecommunications services in their certificated exchanges. ExOp's application only states that it seeks the ETC designation under the provisions of 47 C.F.R. 54.201(d) without further explanation. It is not clear whether ExOp is only seeking the designation for the area where it is presently providing service. Additionally, ExOp's application is not verified nor is there an affidavit attached which would provide evidence sufficient for the Commission to make the determination that ExOp meets the requirements necessary for ETC designation. Applicant seeks intervention in this case in order to protect its interests in providing local exchange service to the customers located within the member companies' service areas. Based on the limited information in the application and until ExOP clarifies what is meant by its service area, Applicant opposes the application.

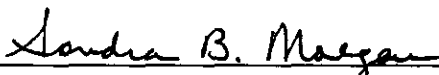
6. Applicant thus has an interest which is different from that of the general public and its interests may be adversely affected by the final order arising from this case. Furthermore, its intervention and participation will serve the public interest.

7. None of the member companies of the STCG has any pending action or final unsatisfied judgments or decisions against them from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the application.

8. None of the member companies of the STCG has any annual report or assessment fees which are overdue.

WHEREFORE, the Small Telephone Company Group respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned proceedings and for such other orders as are reasonable in the circumstances.

Respectfully submitted,


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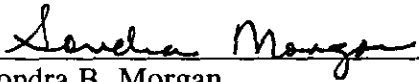
Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed, United States Mail, postage prepaid, this 13th day of November, 2000, to:

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P. O. Box 7800
Jefferson City, MO 65102

Dan Joyce
Missouri Public Service Commission
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Sondra B. Morgan

In the Matter of ExOp of Missouri, Inc.
Case No. TA-2001-251

BPS Telephone Company
Cass County Telephone Company
Citizens Telephone Company of Higginsville, Missouri
Ellington Telephone Company
Fidelity Telephone Company
Goodman Telephone Company, Inc.
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
KLM Telephone Company
Kingdom Telephone Company
Le-Ru Telephone Company
McDonald County Telephone Company
Miller Telephone Company
New London Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Company
Ozark Telephone Company
Peace Valley Telephone Company
Rock Port Telephone Company
Seneca Telephone Company
Spectra Communications Group, LLC
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

ATTACHMENT A