

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65102-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 634-7431

E-MAIL: WREBSE@AOL.COM

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
SARAH J. MAXWELL

CHARLES E. SMARR
DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
RACHEL M. CRAIG
BRIAN T. MCCARTNEY

April 28, 1999

FILED

APR 28 1999

Missouri Public
Service Commission

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

Re: Case No. TT-99-428

Dear Mr. Roberts:

Enclosed for filing on behalf of the Small Telephone Company Group, please find an original and fourteen (14) copies of an Application to Intervene in the above-captioned matter.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel. A copy is being provided to parties of record. I thank you in advance for your cooperation in this matter.

Sincerely,

Brian T. McCartney

Brian T. McCartney

BTM/da
Enclosure
cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
APR 28 1999
Missouri Public
Service Commission

In the Matter of the Alma Telephone Company's)
Filing to Revise its Access Services Tariff,)
P.S.C. Mo. No. 2.)

CASE NO. TT-99-428

APPLICATION TO INTERVENE

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

1. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020 RSMo Supp. 1998 and are therefore subject to the jurisdiction, regulation and control of the Missouri Public Service Commission ("Commission") as provided by law. Applicants are incumbent local exchange companies ("ILECs") providing basic local, local, and exchange access services in those areas of Missouri certificated to them by the Commission.

2. Correspondence, communications, orders and decisions in this matter should be addressed to:

W.R. England, III/Brian T. McCartney
Brydon, Swearingen & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
(573) 635-7166

3. On March 9, 1999, Alma Telephone Company ("Alma"), MoKan Dial, Inc. ("MoKan"), Mid-Missouri Telephone Company ("Mid-Missouri"), Choctaw Telephone Company ("Choctaw"), Chariton Valley Telephone Company ("Chariton Valley"), and Peace

4

Valley ("Peace Valley") filed tariff sheets designed to tariff rates for the termination of intra-Major Trading Area ("MTA") Commercial Mobile Radio Service ("CMRS") originated traffic.

4. On April 1, 1999, the Staff of the Missouri Public Service Commission ("Staff") filed motions to suspend the proposed tariff sheets and applications to intervene. Staff recommended that the filing be suspended and set for hearing to determine the appropriateness of applying tariffed access rates to intra-MTA CMRS-originated traffic.

5. On April 8, 1999, the Commission issued separate Orders suspending the proposed tariffs of Alma, MoKan, Mid-Missouri, Choctaw, Chariton Valley, and Peace Valley in Case Nos. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, and TT-99-433. The Commission found that there were questions of fact and of compliance with the applicable statutes that must be resolved before the Commission can approve the proposed tariff sheets. The Commission also noted that a hearing might be necessary in order to resolve these issues.

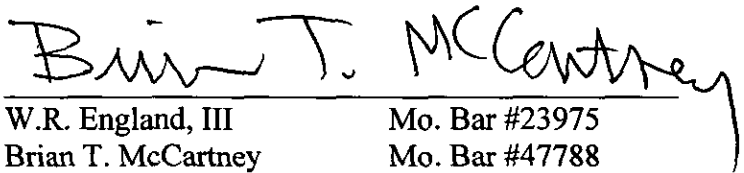
6. Applicants file this Application to Intervene in the instant proceeding on the grounds that the Commission's decisions in this case may directly affect their interests as providers of telecommunications services in Missouri. Applicants are similarly situated with Alma, MoKan, Mid-Missouri, Choctaw, Chariton Valley, and Peace Valley in that they are being required to terminate CMRS originated calls without compensation. Applicants generally support the proposed tariff revisions that will make it clear that, absent an interconnection agreement, intrastate access charges will apply to the termination of this traffic.

7. The Applicants have an interest in this proceeding which is different from that of the general public, and the Applicants' expertise in and perspective on the provision of telecommunications services in this State will aid the Commission in resolving the issues related

to this proceeding. Consequently, the Applicants' intervention and participation will serve the public interest.

WHEREFORE, Applicants respectfully request that the Commission issue an Order authorizing them to intervene 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
Brian T. McCartney Mo. Bar #47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, Missouri 65102-0456
(573) 635-7166

Attorneys for the Small Telephone Company Group

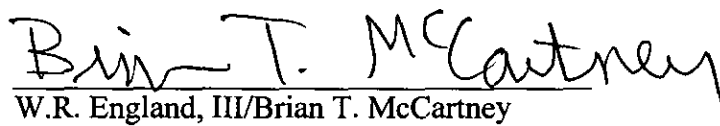
Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 28 day of April, 1999, to:

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

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Craig S. Johnson
Andreck, Evans, Milne, Peace & Baumhoer
P.O. Box 1438
Jefferson City, MO 65102


W.R. England, III/Brian T. McCartney

ATTACHMENT A

BPS Telephone Company
Cass County Telephone Company
Citizens Telephone Company
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Farber Telephone Company
Fidelity Telephone Company
Goodman Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
Le-Ru Telephone Company
McDonald County Telephone Company
Mark Twain Rural Telephone Company
Miller Telephone Company
New Florence Telephone Company
Oregon Farmers Mutual Telephone Company
Ozark Telephone Company
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.