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FILED

AUG 26 1998

Missouri Public
Service Commission

August 26, 1998

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

**Re: Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance;
Case No. TA-99-47**

Dear Mr. Roberts:

Enclosed please find the original plus fourteen (14) copies of Application to Participate Without Intervention 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: *Sandra Morgan*

Sondra B. Morgan

SBM/k
Enclosures

cc: Office of Public Counsel
Staff, Missouri Public Service Commission
John P. Lube
James M. Fischer
Craig S. Johnson
Bob Schoonmaker

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED
AUG 26 1998
Missouri Public
Service Commission

In the Matter of the Application of)
Southwestern Bell Communications)
Services, Inc., d/b/a Southwestern) Case No. TA-99-47
Bell Long Distance for a Certificate)
of Service Authority to provide)
Interexchange Telecommunications)
Services within the State of Missouri.)

THE SMALL TELEPHONE COMPANY GROUP'S
APPLICATION TO PARTICIPATE WITHOUT INTERVENTION

Comes now the Small Telephone Company Group, members of which are set out in Attachment A, (hereinafter the "STCG" or "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").

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

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

3. On August 4, 1998, Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance ("Bell") filed an Application with the Commission for a

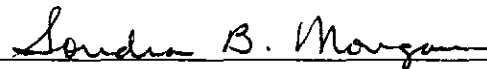
certificate of service authority to provide interexchange telecommunications services within the State of Missouri. Bell states that through this application, it hopes to resolve any issues related to Missouri's statutory requirements and the Commission's rules for certification so that it will be in a position to start offering service as soon as it is permitted by federal law.

4. The Commission established a deadline for the filing of applications to intervene of August 26, 1998.

5. Applicants request that they be granted participation without intervention in this matter in order to monitor the proceeding which may have an effect on their status as local exchange company providers as it relates to responsibilities under the Primary Toll Carrier Plan and the proposed Originating Responsibility Plan. Applicants interest is different from that of the general public in this proceeding. Applicants do not oppose or support this Application at present, but only wish to participate without intervention.

WHEREFORE, the Small Telephone Company Group respectfully requests 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, Swearngen & England, P.C.
P.O. Box 456
Jefferson City, MO 65102

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, United States Mail, postage prepaid, this 26th day of August, 1998, to the following:

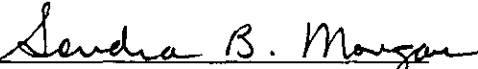
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SMALL TELEPHONE COMPANY GROUP

BPS Telephone Company
Cass County Telephone Company
Citizens Telephone Company of Higginsville, Missouri, Inc.
Ellington Telephone Company
Goodman 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
Le-Ru Telephone Company
Mark Twain Rural Telephone Company
McDonald County 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.

ATTACHMENT A