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June 12, 2002

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: XA-2002-1079

Dear Mr. Roberts:

Enclosed for filing on behalf of the Small Telephone Company Group, please find an original and eight (8) copies of an Application to Intervene.

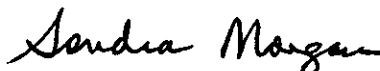
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM/lar

Enclosure

cc: Michael Dandino
Dan Joyce
Carl Lumley

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)	
ICG Telecom Group, Inc., to expand)	
its Certificates of Service Authority)	Case No. XA-2002-1079
to include provision of Local Exchange)	
Telecommunications Service Statewide)	
and to Continue to Classify the Company)	
and Its Services as Competitive.)	

APPLICATION TO INTERVENE

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

1. Applicants 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, Applicants provide "basic local telecommunications 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 § 386.020, RSMo 2000, and are, therefore, subject to the jurisdiction, regulation and control of the Commission as provided by law. Applicants are small local exchange companies as defined in § 386.020(30), RSMo 2000, and 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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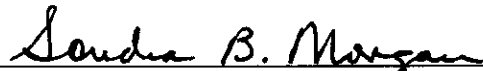
3. On May 17, 2002, ICG Telecom Group, Inc. ("ICG") filed its Application with the Commission requesting an expansion of its certificates of authority to include the provision of "switched local exchange telecommunications service" throughout the State of Missouri. On June 4, 2002, the Commission issued its Notice of Applications in which interested parties were given until June 12, 2002, to file an application to intervene.

4. Applicants file this Application to Intervene in the instant proceeding on the grounds that the expansion of ICG's certificates to provide switched local exchange telecommunications service throughout the State of Missouri will affect Applicants' interests as providers of telecommunication services in Missouri. Applicants thus have an interest in this proceeding that is different from that of the general public. In addition, 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, their intervention and participation will serve the public interest. Applicants are concerned about the Application of ICG requesting expansion of its certificate in order to provide switched local exchange telecommunications services in the service areas of the small local exchange companies that comprise the STCG, particularly, its plan to establish "points of presence" within those exchanges for the benefit of Internet Service Providers. The STCG also opposes the Commission's grant of a certificate of authority to provide

"switched local exchange telecommunications service" that has the effect of granting competitive local exchange telecommunications authority in small company exchanges without requiring that the applicant comply with the requirements of § 392.451, RSMo 2000, which imposes additional conditions on any company seeking authority to provide "basic local telecommunications service" in an area served by a small incumbent local exchange company.

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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SMALL TELEPHONE COMPANY GROUP

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Cass County Telephone Company,
Citizens Telephone Company of Higginsville, Missouri, Inc.,
Craw-Kan Telephone Cooperative, Inc.,
Ellington Telephone Company,
Farber 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,
Lathrop Telephone Company,
Le-Ru Telephone Company,
Mark Twain Rural Telephone Company,
McDonald County Telephone Company,
Miller Telephone Company,
New Florence 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,
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company