

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED³
JAN 17 2003

*Missouri Public
Service Commission*

In the Matter of the Application of)
Integrated Telecommunication)
Services, LLC for a Certificate of)
Service to Provide Resold and Facilities-)
based Basic Local Telecommunications)
Services in Portions of the State of)
Missouri and to Classify Such Services)
as Competitive.)

Case No. CA-2003-0109 .

**MOTION FOR RECONSIDERATION OR CLARIFICATION
OR, IN THE ALTERNATIVE, APPLICATION FOR REHEARING**

Comes now the Small Telephone Company Group ("STCG"), members of which are listed on Appendix A, and for its Motion for Reconsideration or Clarification or, in the alternative, Application for Rehearing states to the Missouri Public Service Commission ("Commission") as follows:

MOTION FOR RECONSIDERATION OR CLARIFICATION

1. On October 1, 2002, the Commission issued its Notice of Applications in which under the heading "Schedule of Applicants for Basic Local and Nonswitched Local Exchange Service Authority," the Commission listed the application for a certificate of service authority to provide basic local telecommunications service filed by Integrated Telecommunication Services, LLC, ("Integrated"). The Commission's Notice stated that the applicant requested a certificate of service authority to provide resold and facilities based basic local exchange telecommunications services in exchanges served by Southwestern Bell Telephone Company, Verizon Midwest, Inc., United Telephone of Missouri d/b/a Sprint, and CenturyTel, the large local exchange companies

or LECs. Because of this Notice and counsel's subsequent review of Integrated's application, the STCG did not file an application to intervene in the proceeding.

2. In reviewing Commission orders, however, counsel for STCG noted that the Commission's Order Granting Certificate to Provide Basic Local Telecommunications Services to Integrated does not limit Integrated's certificate of authority to the exchanges requested in its application and the Commission's Notice, but, in fact, grants Integrated a "certificate of service to provide basic local exchange telecommunications services in the State of Missouri." Nowhere in the Order is there a reference to the fact that the applicant's request for service authority was limited to the large LECs' exchanges. This Order has as effective date of January 19, 2003.

3. The STCG is concerned that this certificate grants Integrated a certificate of service authority in the exchanges of the small telephone companies who are members of STCG. The STCG does not believe the Order is consistent with the applicant's request, nor that it was Integrated's intent to be certificated in the small company exchanges. For this reason, the STCG requests that the Commission reconsider its Order issued January 9, 2003, and/or clarify that the certificate granted to Integrated is limited to the exchanges served by the large LECs as requested in its application.

APPLICATION FOR REHEARING

In the alternative, the STCG requests that the Commission grant rehearing of Case No. CA-2003-0109 pursuant to § 386.500, RSMo 2000, because the order of the Commission in this case is unlawful, unjust and unreasonable as stated below.

4. The Commission's order is unlawful, unjust and unreasonable because the notice of the service authority requested in the Commission's Notice of Applications is inconsistent with

the service authority actually granted. Thus, the Commission did not give the STCG adequate notice of the authority to be granted, and the STCG was not given an opportunity to intervene in the proceeding in order to protect its interests.

5. Section 392.451.1, RSMo 2000, states that the Commission shall approve an application for a certificate of service authority to provide basic local telecommunications service or for the resale of basic local telecommunications service in an area that is served by a small incumbent local exchange telecommunications company only upon a showing by the applicant, and a finding by the commission, that the applicant has met certain conditions. These conditions are 1) that the applicant shall, throughout the service area of the incumbent, offer all telecommunications services which the commission has determined are essential for purposes of qualifying for state universal support, and 2) that the applicant advertise the availability of such essential services and the charges for those services using media of general distribution. Integrated made no such showing, nor did the Commission make any finding regarding these requirements in its Order. The Commission's grant of basic local telecommunications authority to Integrated throughout the entire state is thus unlawful, unjust and unreasonable.

For all the reasons set out above, the STCG respectfully requests that the Commission grant its Motion for Reconsideration or Clarification or, in the Alternative, Application for Rehearing.

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 hand-delivered this 17th day of January, 2003 to:

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SMALL TELEPHONE COMPANY GROUP

BPS Telephone Company,
Cass County Telephone Company,
Citizens Telephone Company of Higginsville, Missouri, Inc.,
Craw-Kan Telephone Cooperative, Inc.,
Ellington Telephone Company,
Farber 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,
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