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April 24, 2000

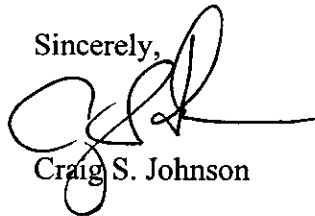
Mr. Dale Hardy Roberts
Chief ALJ
MO Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: TO-2000-667

Dear Mr. Roberts:

Enclosed please find an original and 15 copies of the MITG's Application to Intervene in this docket. Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:skl

Enclosure

cc: Dan Joyce
Michael Dandino
Paul DeFord
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Leo Bub
MITG Managers

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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

FILED³

APR 25 2000

Missouri Public
Service Commission

In the Matter of the Investigation into the)
Effective Ability for Resale of South-)
Western Bell Telephone Company's)
Local Plus Service by Interexchange)
Carriers and Facilities-Based Comp-)
Titive Local Exchange Companies.)

Case No. TO-2000-667

APPLICATION TO INTERVENE

COMES NOW The Missouri Independent Telephone Company Group (MITG) of Local Exchange Companies, Alma, Chariton Valley, Choctaw, Mid-Missouri, Modern, MoKan Dial, and Northeast Missouri Rural Telephone Companies, and hereby moves to intervene in this proceeding. In support of this Application, the MITG states as follows:

1. The MITG consists of seven rural, small, local exchange companies, who are also classified as Rural Telephone Companies under the Telecommunications Act of 1996. MITG members provide local, basic local, and exchange access services. The MITG (formerly the Mid-Missouri Group) has participated in past dockets concerning the structure and provisioning of Local Plus Service.

2. The MMG is subject to the regulatory supervision of the Missouri Public Service Commission.

3. Copies of all filings in this docket should be directed to the MITG by serving:

Craig S. Johnson
Andereck Evans Milne Peace & Johnson, LLC
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4. This case was created as a result of an Report and Order issued April 6, 2000, in which the Commission expressed concerns regarding the manner of making Local Plus available for resell, and the ramifications thereof. Although the MITG did not

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participate in that docket, as it nominall only concerned the propriety of discounts to LP pricing, the MITG has reviewed the transcript in TT-2000-258. The implication of the issues raised in that case regarding the stuctures being considered for the resale of LP are of great interest to the MITG. It is expected that more and more intraLATA toll will be converted to LP traffic, which may impact a significant and vital revenue stream of the MITG, intraLATA terminating access revenues. he April 20 Order establishing this docket provided for notice to all telecommunications companies in the state of Missouri in order that they be allowed an opportunity to intervene.

5. The MITG is interested in these issues, and in particular the impact of different potential resale structures upon compensation for LP traffic to the MITG members and other ILECs besides SWB. In particular the MITG is interested in what manner LP will be "purely resold", in what manner CLECs and IXC's will be considered "facilities-based" resellers, what deviations from the approved LP calling scopes and patterns will be permitted, whether resale will be configured or structured in such a manner that the "reselling" entity, as opposed to SWB, will be responsible for terminating compensation; what facilities will be utilized in routing this traffic for termination, what recording systems will be utilized, what records will be made, who will be responsible for delivering or passing such records, and the integration of such systems into existing systems in use between IXC's, CLECs, and ILECs. As such the interest of the MITG in this proceeding is different from that of the general public.

6. The MITG is interested in the impact of interconnection agreements between SWB and CLECs or IXC's that cover or address traffic destined for termination on the network of LECs which are not parties to the interconnection agreement, as such may or have the ability to discriminate against non-parties to the IA in that they preclude IAs between the IXC's or CLECs and other LECs, or in that they may preclude or prejudice the ability of the other LECs to assure their access tariffs are complied with, or preclude their ability to assure compensation is appropriately paid.

7. The MITG has expertise which may assist the Commission in understanding the potential impacts of the resale of LP on LECs that do not offer LP.

8. Granting of this intervention application is in the public interest.

WHEREFORE, on the basis of the foregoing, the MITG respectfully requests that this application to intervene and participate as a party be granted.

ANDERECK, EVANS, MILNE
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By: 

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ATTORNEYS FOR
MITG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, U. S. Mail, postage pre-paid, this 29 day of Apr., 2000, to all attorneys of record.


Craig S. Johnson.