

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Missouri RSA)	
No. 7 Limited Partnership d/b/a Mid-Missouri)	
Cellular for Designation as a Telecommunications)	
Company Carrier Eligible for Federal Universal)	<u>Case No. TO-2003-0531</u>
Service Support Pursuant to Section 254 of the)	
of the Telecommunications Act of 1996.)	

APPLICATION TO INTERVENE OF
SPRINT MISSOURI, INC.
AND SPRINT SPECTRUM L.P.

COMES NOW Sprint Missouri, Inc. and Sprint Spectrum L.P. d/b/a Sprint PCS (herein referred to collectively as 'Sprint') and respectfully submits its Application to Intervene in this proceeding pursuant to Commission Rule 4 CSR 240-2.075 and the Commission's June 5, 2003 Order Directing Filing. In support of this Application, Sprint states as follows:

1. On June 2, 2003, Missouri RSA No. 7 Limited Partnership, d/b/a Mid-Missouri Cellular, filed its application with the Missouri Public Service Commission for designation as an eligible telecommunications carrier with respect to federal universal service support provisions under Section 254 of the Telecommunications Act of 1996 and the associated regulations of the Federal Communications Commission.
2. On June 5, 2003, the Commission issued its Order Directing Filing and ruled that any party wishing to intervene must file an application by June 25, 2003.

3. Sprint Missouri, Inc. is a Missouri corporation with offices at 319 Madison, Jefferson City, Missouri 65102. Sprint Missouri, Inc. is authorized to transact business within the State of Missouri and is authorized by the Missouri Public Service Commission ("Commission") to provide basic local service within the state.
4. Sprint Spectrum L.P. d/b/a Sprint PCS is a Commercial Mobile Radio Service provider as that term is defined in the Federal Telecommunications Act and is subject to the jurisdiction of the Federal Communications Commission. ("FCC") Further, Sprint Spectrum L.P d/b/a Sprint PCS is a limited partnership organized under the laws of the state of Delaware. Sprint Spectrum L.P d/b/a Sprint PCS is duly authorized to conduct business in Missouri with its principal office located at 6200 Sprint Parkway, Overland Park, Kansas 66251.
5. Pursuant to 4 CSR 240.2.075 (2) Sprint states that in this Application, Sprint generally supports Missouri Cellular's request for designation as an eligible telecommunications carrier in this case.
6. In response to 4 C.S.R. 240-2.075 (4)(A), Sprint states that its interests in this proceeding are different from that of the general public and cannot be represented by any other party to this proceeding. Mid-Missouri Cellular seeks ETC status in 19 exchanges served by Sprint Missouri, Inc.¹. Furthermore, the final outcome of this case could adversely affect Sprint and its interests in that Sprint Spectrum L.P. d/b/a PCS could also be affected by

¹ See Mid-Missouri Cellular's Application for Designation as an Eligible Telecommunication Carrier, June 2, 2003, Appendix E.

any Commission findings in this proceeding related to ETC status designation for CMRS providers in Missouri. Sprint agrees with Mid-Missouri Cellular's statement that no CMRS carrier has sought ETC designation in Missouri and, as such, Sprint may be affected by the findings and conclusions reached in this case.

7. In addition to the above, granting Sprint's Application to Intervene will also be in the public interest because Sprint will bring to this proceeding its expertise in the areas being investigated and its experience as both a large local exchange carrier and a CMRS provider. In Case No. TO-98-205², the Commission ruled that "Sprint Missouri, Inc. is designated an eligible telecommunications carrier for purposes of federal universal service support pursuant to 47 U.S.C. " 214(e) and 254(e). Sprint's Missouri service area shall be its service area for purposes of federal universal service support. Sprint's service area shall be equivalent to its study area pursuant to 47 C.F.R. 54.207(b)." As such, Sprint has experience as an ETC carrier and with geographic study areas – both of which are issues arising in this case. Sprint has participated in similar proceedings in other states and brings a unique perspective to this issue as it has both wireline and wireless interests.

8. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

² In the Matter of the Application of United Telephone Company of Missouri d/b/a Sprint for Designation as an Eligible Telecommunications Carrier Under 47 U.S.C. Section 214(E)(2) of the Telecommunications Act of 1996

Lisa Creighton Hendricks
Attorney for Sprint
6450 Sprint Parkway
MS: KSOPHN0212-2A253
Overland Park, Kansas 66251
Voice: 913-315-9363
Fax: 913-523-9769
Lisa.c.creightonhendricks@mail.sprint.com

Jeff M. Pfaff
Attorney for Sprint
6450 Sprint Parkway
MS: KSOPHN0212
Overland Park, Kansas 66251
Voice: 913-315-9251
Fax: 913-523-9769
Jpfaff01@mail.sprint.com

WHEREFORE, Sprint Missouri, Inc. and Sprint Spectrum L.P. d/b/a Sprint PCS
respectfully requests that the Commission grant this Application to Intervene.

Respectfully submitted,
SPRINT



Lisa Creighton Hendricks - MO Bar #42194
6450 Sprint Parkway
MS: KSOPHN0212-2A253
Overland Park, Kansas 66251
Voice: 913-315-9363
Fax: 913-523-9769
Lisa.c.creightonhendricks@mail.sprint.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, U.S. Mail, postage pre-paid, this 25th day of June, 2003, to:

Craig S. Johnson
Lisa Cole Chase
700 East Capitol Avenue
The Col. Darwin Marmaduke House
P.O. Box 1438
Jefferson City, MO 65102

Paul DeFord
Lathrop & Gage, L.C.
2345 Grand Boulevard, Suite 280
Kansas City, MO 64108-2684

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

W.R. England, III
Sondra B. Morgan
Brydon, Swearngen & England, P.C.
P.O. Box 456
Jefferson City, MO 65101

Marc Poston
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

James M. Fischer
Larry W. Dority
Attorney at Law
101 West McCarty Street
Suite 215
Jefferson City, MO 65101


Lisa Creighton Hendricks