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January 20, 2000

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
301 West High Street, Suite 530  
Jefferson City, MO 65101

**FILED**

JAN 21 2000

**Missouri Public  
Service Commission**

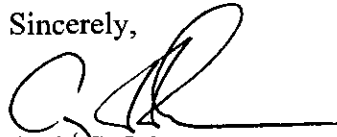
Re: Case No. TO-2000-374

Dear Dale:

Enclosed for filing please find an original and fifteen (15) copies of the Application to Intervene of the Missouri Independent Telephone Group.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ/mo

Enclosure

cc: Dan Joyce  
MITG Managers

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STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

FILED

JAN 21 2000

Missouri Public  
Service Commission

In the Matter of the Petition of the )  
North American Numbering Plan )  
Administrator, on Behalf of the Missouri ) Case No. TO-2000-374  
Telecommunications Industry, for )  
Approval of NPA Relief Plan for the 314 )  
and 816 Area Codes. )

Application to Intervene of the  
Missouri Independent Telephone Group

The Missouri Independent Telephone Group of local exchange companies, Alma Telephone Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company, Modern Telecommunications Company, MoKan Dial Inc., and Northeast Missouri Rural Telephone Company, hereinafter referred to as the Missouri Independent Telephone Group, hereby applies to intervene in this proceeding. In support of this Application the Missouri Independent Telephone Group states as follows:

1. Communications to Mid Missouri Independent Telephone Group should be made to Craig S. Johnson, 305 E. McCarty St. P.O. Box 1438, Jefferson City, Missouri, 65102, telephone # 573-634-3422, fax # 573-634-7822.

2. The Missouri Independent Telephone Group consists of seven certificated local exchange companies providing local and exchange access services in their respective certificated exchanges. The Missouri Independent Telephone Group companies are also rural telephone companies under the Telecommunications Act of 1996, and small incumbent local exchange telecommunications companies under the provision of 1996 SB 507.

3. In its January 19, 2000, Order and Notice of Petition, the Commission has notified interested parties that on December 17, 1999, the North American Numbering Plan Administrator NeuStar, Inc. (NANPA) filed a pleading requesting that the Commission approve "retroactive" all services overlay relief plan for the 314 Numbering Plan Area (NPA) and a single all services overlay relief plan for the 816 NPA. At the request of the Office of Public Counsel an intervention period was established that expires on February 4, 2000.

4. Although the Missouri Independent Telephone Group does not have exchanges in the 314 and 816 area code, the issues presented in this proceeding may have a presidential impact on the development of overlay plans as they pertain to area codes statewide. Furthermore, Missouri Independent Telephone Group's expertise in and perspective on the condition of telecommunications services in this State will aid the Commission in resolving the issues related to this proceeding. Accordingly, Missouri Independent Telephone Group's intervention and participation will serve the public interest.

WHEREFORE, the Missouri Independent Telephone Group respectfully requests that it be allowed to intervene and participate fully herein as parties.

**ANDERECK, EVANS, MILNE,  
PEACE & JOHNSON, L.L.C.**

By: 

Craig S. Johnson - MO Bar #28179

Rob Trowbridge - MO Bar #44637

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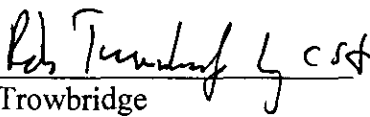
**ATTORNEYS FOR MISSOURI  
INDEPENDENT TELEPHONE GROUP**

**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 19<sup>TH</sup> day of January, 2000, to;

Dan Joyce  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Michael Dandino  
Office of Public Counsel  
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Rob Trowbridge