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January 28, 2000

VIA FEDERAL EXPRESS

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

FILED

JAN 31 2000

Re: Birch Telecom of Missouri, Inc.

Dear Judge Roberts:

Missouri Public
Service Commission

Please find enclosed one original and 14 copies of a Motion to Intervene filed on behalf of Birch Telecom of Missouri, Inc. in Case No. TO-2000-374. This motion is filed in response to the Commission's Order and Notice of Petition dated January 19, 2000. As you can see from the Certificate of Service, copies of this pleading have been served on the Office of the Public Counsel and each of the parties named in the Order.

Please date stamp and return the enclosed copy of this cover letter in the return envelope we have provided to signify your receipt of this pleading. If you have any questions, please call me.

Yours truly,



Wendy E. DeBoer

WED:emk

Encs.

cc: Ms. Ellen L. Herrmann w/enc.

Walnut 528769.1

FILED

BEFORE THE PUBLIC SERVICE COMMISSION JAN 31 2000
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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

MOTION TO INTERVENE

COMES NOW Birch Telecom of Missouri, Inc. ("Birch") and hereby submits its Motion to Intervene in Case No. TO-2000-374 pursuant to the Missouri Public Service Commission's (the "Commission") Order and Notice of Petition dated January 19, 2000.

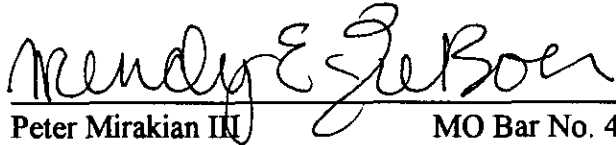
1. Birch is a Delaware corporation with principal offices located at 2020 Baltimore Avenue, Kansas City, Missouri 64108, and holds certificates to provide basic local, local exchange, and interexchange telecommunications services in the State of Missouri.

2. Birch is filing this Motion to Intervene in accordance with the Commission's January 19 Order because Birch and Birch's customers will be affected by the resolution of this case. By virtue of offering its services in the 816 and 314 areas, Birch has an interest in this proceeding which is different from that of the general public, and Birch desires to protect its interests by being permitted to intervene in this case.

WHEREFORE, Birch Telecom of Missouri, Inc. respectfully requests the Commission to grant Birch's Motion to Intervene.

Respectfully Submitted,

SPENCER FANE BRITT & BROWNE LLP



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ATTORNEYS FOR BIRCH TELECOM
OF MISSOURI, INC.

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the above and foregoing Motion to Intervene of Birch Telecom of Missouri, Inc. in Case No. TO-2000-374 was serve via U.S. Mail, postage prepaid this 28th day of January, 2000, upon:

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

Lee S. Adams, Esq.
Morrison & Foerster LLP
2000 Pennsylvania Avenue, N.W., Suite 5500
Washington, D.C. 20006


Attorney for Birch Telecom of Missouri, Inc.