

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of an Investigation into the Adequacy )  
of the Local Calling Scopes of SBC Local Exchanges ) **Case No. TO-2003-0298**  
of Washington, Union, St. Clair, and Beaufort, in and )  
around Franklin County. )

In the Matter of a Request for Expansion of the )  
St. Louis Metropolitan Calling Area Plan to Include the ) **Case No. TO-2005-0141**  
Exchanges of Washington, Union, Wright City, St. Clair, )  
Marthasville, Beaufort, Foley and Warrenton. )

## APPLICATION TO INTERVENE

COME NOW Fidelity Telephone Company (“Fidelity”) and Orchard Farm Telephone Company (“Orchard Farm”)(collectively “Applicants”) pursuant to 4 CSR 240-2.075 and the Commission’s March 3, 2005 *Order Setting Intervention Deadline*, and state as follows:

1. Applicants currently provide telecommunications services to members of the public located in those areas certificated to them by the Missouri Public Service Commission (“Commission”). Applicants are “telecommunications companies” and “public utilities” as those terms are defined by §386.020 RSMo 2000 and are therefore subject to the jurisdiction, regulation and control of the Commission as provided by law.

2. Correspondence, communications, orders and decisions in this matter should be addressed to:

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3. Fidelity provides telecommunications services in exchanges adjacent to some of the local exchanges identified for possible addition to the Metropolitan Calling Area (MCA) or calling scope expansion. Any expansion of calling scopes or the MCA Plan in this case could result in requests for expansion of calling scopes or the MCA Plan to Fidelity's exchanges. Orchard Farm presently offers MCA service to its local exchange customers, and any changes to the present MCA plan could have an impact on Orchard Farm's cost of providing service. Therefore, Applicants have an interest in this proceeding which is different from that of the general public, and the Applicants' expertise in and perspective on the provision of telecommunications services in this State will aid the Commission in resolving the issues related to this proceeding. Consequently, the Applicants' intervention and participation will serve the public interest. Applicants do not have a position on the case at this time.

WHEREFORE, Applicants respectfully request that the Commission issue an Order granting this application to intervene in the above-captioned proceeding and granting such other orders as are reasonable in the circumstances.

Respectfully submitted,

**/s/ Brian T. McCartney**

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed, served electronically, or hand-delivered, this 14<sup>th</sup> day of March, 2005, to:

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