

W. R. England, III
Sondra B. Morgan
Brian T. McCartney
Brydon, Swearngen & England P.C.

P.O. Box 456
Jefferson City, Missouri 65102
(573) 635-7166
(573) 634-7431 (fax)
trip@brydonlaw.com (email)
smorgan@brydonlaw.com (email)
bmccartney@brydonlaw.com (email)

3. On June 3, 2005, Northwest Cellular Limited Partnership ("Northwest Cellular") filed an Application requesting designation as an eligible telecommunications carrier pursuant to Section 254 of the Telecommunications Act of 1996. Northwest Cellular is a telecommunications carrier authorized by the Federal Communications Commission ("FCC") to provide commercial mobile radio services ("CMRS") in Missouri. Northwest Cellular is not certificated by the Missouri Commission to provide basic local telecommunications services, and the services it provides do not fall within the definition of "telecommunications service" as that term is defined in § 386.020(53)(c), RSMo 2000.

4. Northwest Cellular requests ETC designation for its entire FCC-licensed service area subject to certain limitations set out in the Application. Northwest Cellular seeks ETC designation in all or part of the service area of Applicants.

5. On June 7, 2005, the Commission issued an Order Directing Notice in this proceeding setting June 27, 2005, as the deadline for parties wishing to intervene.

6. Applicants file this Application to Intervene in the instant proceeding on the grounds that the grant of ETC designation to Northwest Cellular as a CMRS provider not regulated by the Missouri Commission will affect Applicants' ability to provide

telecommunications services in their certificated exchanges. The Commission may only

~~designate an additional carrier as an ETC in an area served by a rural telephone company if~~

that designation is consistent with the public interest, convenience and necessity and upon an express finding that the designation is in the public interest. Granting ETC status to Northwest Cellular and allowing it to collect Universal Service Fund ("USF") funds is not in the public interest as granting ETC status to Northwest Cellular will not bring benefits to the community that the community does not already have. In addition, the grant of ETC designation to Northwest Cellular will not increase competition in the requested service areas as those areas are already served by local exchange companies and wireless providers. Granting ETC status to an additional carrier will also have an adverse effect on the USF fund itself and will increase the amount that consumers will be assessed. Therefore, Applicants seek intervention in this case in order to protect their interests in providing basic local exchange service to the customers located within their respective service areas. Applicants oppose the application.

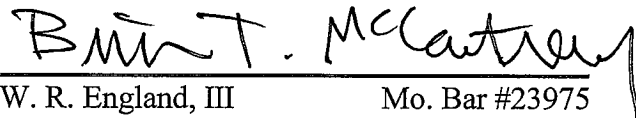
7. Applicants thus have interests that are different from those of the general public and their interests may be adversely affected by the final order arising from this case. Furthermore, their intervention and participation will serve the public interest.

8. Applicants do not have any pending action or final unsatisfied judgments or decisions against them from any state or federal agency or court which involves customer service or rates, which action, judgment or decision has occurred within three (3) years of the

date of the application. Neither do Applicants have any annual report or assessment fees that
~~are overdue.~~

WHEREFORE, Applicants respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned proceeding and for such other orders as are reasonable in the circumstances.

Respectfully submitted,



W. R. England, III Mo. Bar #23975
Sondra B. Morgan Mo. Bar #35482
Brian T. McCartney Mo. Bar #47788
BRYDON, SWEARENGEN & ENGLAND P.C.
P.O. Box 456
Jefferson City, Missouri 65102
(573) 635-7166
(573) 635-0427 (Fax)
trip@brydonlaw.com (email)
smorgan@brydonlaw.com (email)
bmcartney@brydonlaw.com (email)
Attorneys for Applicants

Certificate of Service

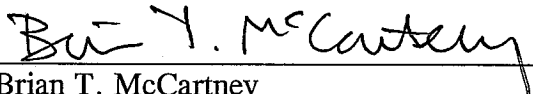
I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered or mailed, United States Mail, postage prepaid, this 27th day of June, 2005 to:

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

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

Paul DeFord
Lathrop & Gage, L.C.
2345 Grand Boulevard, Suite 2800
Kansas City, MO 64108-2684

Robert J. Gryzmala
SBC
One SBC Center, Room 3516
St. Louis, MO 63101



Brian T. McCartney