

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

**RESPONSE OF ORCHARD FARM TELEPHONE COMPANY**

COMES NOW Orchard Farm Telephone Company ("Orchard Farm") and for its Response to the CenturyTel Stipulation and Agreement states to the Missouri Public Service Commission ("Commission") as follows:

1. On April 18, 2006, Office of Public Counsel ("OPC"), CenturyTel of Missouri, LLC ("CenturyTel") and the Staff of the Missouri Public Service Commission ("Staff"), filed a Stipulation and Agreement resolving matters related to expansion of the St. Louis Metropolitan Calling Area (MCA) Plan.
2. Orchard Farm Telephone Company does not oppose the proposed Stipulation between CenturyTel, Staff and Public Counsel. However, Orchard Farm does reserve the right to file revenue neutral tariffs if implementation of the Stipulation and Agreement results in a material revenue loss to Orchard Farm. Because Orchard Farm cannot determine the subscribership to the "new" MCA service as a result of the addition of these exchanges at this time, Orchard Farm proposes to wait until six months after implementation of the Stipulation and Agreement to see if there is any actual revenue loss. At that time, if Orchard Farm determines that the actual loss was material, it will then file revenue neutral tariffs.

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 27th day of April, 2006, to:

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