

In the Matter of a Request for Expansion of the)
 Kansas City Metropolitan Calling Area Plan to Make the) **Case No. TO-2005-0144**
 Greenwood Exchange Part of the Mandatory MCA Tier 2.)

COME NOW Cass County Telephone Company (“Cass County”) and Lathrop Telephone Company (“Lathrop”)(collectively “Applicants”) pursuant to 4 CSR 240-2.075 and the Commission’s *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:

W.R. England, III
Brian T. McCartney
Brydon, Swearngen, & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
573/635-7166 (tel.)
573/634-7431 (fax)
trip@brydonlaw.com
bmccartney@brydonlaw.com

3. Cass County and Lathrop presently offer MCA service to their local exchange customers, and any changes to the present MCA plan could have an impact on their cost of providing service. Thus, 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

W.R. England, III Mo. Bar #23975
Brian T. McCartney Mo. Bar #47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
Jefferson City, Missouri 65102-0456
573/635-7166 (tel.)
573/634-7431 (fax)
trip@brydonlaw.com
bmccartney@brydonlaw.com

Attorneys for the Applicants

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 30th day of March, 2005, to:

Michael Dandino
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102
Mike.dandino@ded.mo.gov

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
d.joyce@psc.mo.gov
marc.poston@psc.mo.gov

Craig S. Johnson/Brian Lade
Andereck, Evans, Milne, Peace & Johnson
P.O. Box 1438
Jefferson City, MO 65102
cjohnson@aempb.com
blade@aempb.com

Paul Lane/Leo Bub
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101
pl6594@sbc.com
leo.bub@sbc.com

Brett Leopold
Sprint Missouri, Inc.
6450 Sprint Parkway
Overland Park, KS 66251
brett.d.leopold@mail.sprint.com

/s/ Brian T. McCartney