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June 18, 2003

Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Case No. TO-2003-531

Dear Mr. Roberts:

Enclosed for filing on behalf of Citizens Telephone Company of Higginsville, Missouri, please find an original and eight (8) copies of an Application to Intervene.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM/lar
Enclosure

cc: Dan Joyce
Michael Dandino
Paul DeFord
Lisa Cole Chase
Jim Fischer/Larry Dority

FILED²
JUN 18 2003
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUN 18 2003

Missouri Public
Service Commission

In the Matter of the Application)
of Missouri RSA No. 7 Limited)
Partnership d/b/a Mid-Missouri)
Cellular for Designation as a)
Telecommunications Carrier Eligible)
for Federal Universal Service Support)
Pursuant to Section 254 of the)
Telecommunications Act of 1996.)

Case No. TO-2003-0531

APPLICATION TO INTERVENE

Comes now Citizens Telephone Company of Higginsville, Missouri, ("Citizens") and in support of its Application to Intervene in the above-captioned matter states that:

1. Citizens currently provides telecommunications services to members of the public located in the area certificated to it by the Missouri Public Service Commission ("Commission"). As is relevant to this case, Citizens provides "basic local telecommunications services" within one Missouri exchange as defined by its tariff on file with and approved by the Commission. Citizens is a "telecommunications company" and "public utility" as those terms are defined by § 386.020, RSMo 2000, and is, therefore, subject to the jurisdiction, regulation and control of the Commission as provided by law. Citizens is also a rural telephone company and incumbent local exchange carrier as defined by the Federal Telecommunications Act of 1996 (the "Act"). The company has also been designated by the Commission as an eligible telecommunications carrier ("ETC") for purposes of receiving Federal Universal Service Fund monies.

2. All correspondence, communications, orders and decisions in this matter should be addressed to the following:

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3. On June 2, 2003, Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular ("MMC") filed an Application requesting designation as an eligible telecommunications carrier pursuant to Section 254 of the Telecommunications Act of 1996. MMC is a telecommunications carrier authorized by the Federal Communications Commission ("FCC") to provide commercial mobile radio services ("CMRS") in Missouri. MMC 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. MMC is the first CMRS carrier to seek ETC designation in Missouri. Thus, this is a case of first impression for the Commission.

4. MMC requests ETC designation for its entire FCC-licensed service area subject to certain limitations set out in the Application. MMC seeks ETC designation in the service area of Citizens.

5. On June 5, 2003, the Commission issued an Order Directing Notice in this proceeding setting June 25, 2003, as the deadline for parties wishing to intervene.

6. Citizens files this Application to Intervene in the instant proceeding on the grounds that the grant of eligible telecommunications carrier designation to MMC as a CMRS provider not regulated by the Missouri Commission will affect Citizens' ability to provide telecommunications

services in its certificated exchange. In considering this Application, Citizens believes that MMC must demonstrate to the Commission that it currently offers all of the services that are supported by the federal universal service support mechanisms under § 254(c) of the Act including Lifeline and Linkup services. Citizens is not certain that MMC can demonstrate to the Commission that it provides all of these services. Secondly, 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 MMC and allowing it to collect Universal Service Fund ("USF") funds is not in the public interest as granting ETC status to MMC will not bring benefits to the community that the community does not already have. Finally, the grant of ETC designation to MMC will not increase competition in the requested service area as that area is already served by at least three local exchange companies and up to as many as five (5) 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, Citizens seeks intervention in this case in order to protect its interests in providing basic local exchange service to the customers located within its service area. Citizens opposes the application.

7. Citizens thus has an interest that is different from that of the general public and its interests may be adversely affected by the final order arising from this case. Furthermore, its intervention and participation will serve the public interest.

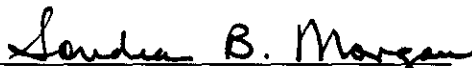
8. Citizens does not have any pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates,

which action, judgment or decision has occurred within three (3) years of the date of the application.

9. Citizens does not have any annual report or assessment fees that are overdue.

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

Respectfully submitted,


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Attorneys for
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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 18th day of June, 2003 to:


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