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April 6, 2005

**FILED<sup>3</sup>**

APR 06 2005

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Secretary/Chief Administrative Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

Missouri Public  
Service Commission

**Re: In the Matter of A Request For Expansion Of The St. Louis Metropolitan  
Calling Area Plan. Case No. TO-2005-0141**

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of the Substitute Prior Notice of Participation With The Application To Intervene.

Thank you for seeing this filed.

Sincerely,

  
Lisa Cole Chase

LCC:sjo

enclosure

CC: PSC General Counsel  
OPC General Counsel  
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FILED<sup>3</sup>

APR 06 2005

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In The Matter Of A Request For )  
Expansion Of The St. Louis )  
Metropolitan Calling Area Plan )  
To Include The Exchanges Of ) Case No. TO-2005-0141  
Washington, Union, Wright City, St. )  
Clair, Marthasville, Beaufort, )  
Foley, And Warrenton )

**SUBSTITUTE PRIOR NOTICE OF PARTICIPATION WITH THIS  
APPLICATION TO INTERVENE**

COMES NOW the Missouri Independent Telephone Company Group ("MITG")<sup>1</sup>, pursuant to 4 CSR 240-2.075, and hereby file this Application to Intervene in substitute of its prior Notice of Participation. In support thereof, Applicants 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. Copies of all filings in this docket should be directed to the MITG by serving:

Craig S. Johnson  
Lisa Cole Chase  
Andereck Evans Milne Peace & Johnson, LLC  
P.O. Box 1438  
Jefferson City, MO 65201  
(573) 634-3422  
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<sup>1</sup> Alma Communications Company d/b/a Alma Telephone Company, Choctaw Telephone Company, MoKan Dial, Inc., Mid-Missouri Telephone Company, Chariton Valley Telephone Corporation, and Northeast Missouri Rural Telephone Company.

3. On November 22, 2004, the Office of Public Counsel ("OPC") filed requests for modification or expansion of the Kansas City, Springfield and St. Louis MCAs. OPC's requests for modification or expansion also recommended that the Commission issue a notice to all potentially affected carriers and request certain financial information from affected carriers.

4. The MITG companies provide local, basic local, and exchange access services to customers in rural exchanges throughout Missouri. Some of these exchanges are currently included in MCAs in Kansas City and Springfield. While the MITG companies do not serve in the St. Louis MCA, the Applicants seek to intervene because the Commission historically applies the same principles to all MCAs in Missouri, the principles adopted in this case could equally apply to the MITG companies in the Springfield and Kansas City MCAs, and the MITG can benefit the Commission with their experience from operating within previously established MCAs. 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 substitution of Applicants' notice of participation in the above-captioned proceeding and grant such other orders as are reasonable in the circumstances.

Respectfully Submitted,

ANDERECK, EVANS, MILNE  
PEACE & JOHNSON

By: 

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ATTORNEYS FOR THE MITG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was hand delivered or mailed, U. S. Mail, postage pre-paid, this 6<sup>th</sup> day of April, 2005, to:

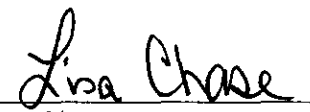
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