ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

EUGENE E. ANDERECK TERRY M. EVANS ERWIN L. MILNE JACK PEACE CRAIG S. JOHNSON RODRIC A. WIDGER GEORGE M. JOHNSON BEVERLY J. FIGG WILLIAM S. LEWIS VICTOR S. SCOTT COREY K. HERRON ATTORNEYS AT LAW 700 EAST CAPITOL AVENUE COL. DARWIN MARMADUKE HOUSE P.O. BOX 1438 JEFFERSON CITY, MISSOURI 65102-1438 TELEPHONE 573-634-3422 FAX 573-634-7822

April 6, 2005

MATTHEW M. KROHN LANETTE R. GOOCH SHAWN BATTAGLER ROB TROWBRIDGE JOSEPH M. PAGE LISA C. CHASE JUDITH E. KOEHLER ANDREW J. SPORLEDER

FILED³ APR 0 6 2005

OF COUNSEL MARVIN J. SHARP PATRICK A. BAUMHOER GREGORY C. STOCKARD (1904-1993) PHIL HAUCK (1924-1991)

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 the Modification of the Springfield Metropolitan Calling Area Plan. Case No. TO-2005-0143

Dear Secretary:

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

Thank you for seeing this filed.

Sincerely,

Lisa Cole Chase

LCC:sjo

enclosure

CC: PSC General Counsel OPC General Counsel W.R. England, III Bryan McCartney Paul Lane Leo Bulb Mimi B. MacDonald Larry Dority

TRENTON OFFICE 9th AND WASHINGTON P.O. BOX 547 TRENTON, MISSOURI 64683-0547 660-339-2244 FAX 660-359-2116 SPRINGFIELD OFFICE 1111 S. GLENSTONE P.O. BOX 4929 SPRINGFIELD, MISSOURI 65808-4929 417-854-6401 FAX 417-864-4967 PRINCETON OFFICE 207 NORTH WASHINGTON PRINCETON, MISSOURI 64673 660-748-2244 FAX 660-748-4405 SMITHVILLE OFFICE 119 E. MAIN STREET P.O. BOX 654 SMITHVILLE, MISSOURI 64089 816-532-3895 FAX 816-532-3899

FILED³

APR 0 6 2005

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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Missouri Public Service Commission

In the Matter of a Request For The Modification of the Springfield Metropolitan Calling Area Plan To Make the Ozark Exchange Part of the Mandatory Mca Tier 1 Exchange

Case No. To-2005-0143

SUBSTITUTE APPLICATION TO INTERVENE

COMES NOW Choctaw Telephone Company ("Choctaw") pursuant to 4 CSR 240-2.075, and hereby file this Substitute Application to Intervene. In support thereof, Choctaw states as follows:

1. Choctaw currently provides telecommunications services to members of the public located in the Halltown exchange, which is the area certificated to Choctaw by the Missouri Public Service Commission ("Commission"). Choctaw 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.

2. Copies of all filings in this docket should be directed to Choctaw 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 (573) 634-7822 fax 3. On November 22, 2004, the Office of Public Counsel ("OPC") filed a request for the mandatory addition of the Lexington exchange to the Springfield MCA Tier 1. OPC's request for modification also recommended that the Commission issue a notice to all potentially affected carriers and request certain financial information from affected carriers.

4. Choctaw presently offers MCA service to its local exchange customers in the Springfield MCA, and any changes to the present MCA plan could have an impact on Choctaw's cost of providing service. Therefore, Choctaw has an interest in this proceeding which is different from that of the general public, and Choctaw's 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, Choctaw's substitute application to intervene, which deletes reference to "monitoring", will serve the public interest. Choctaw does not have a position on the case at this time.

WHEREFORE, on the basis of the foregoing, Choctaw Telephone Company respectfully requests that this substitute application to intervene and participate as a party be granted. Respectfully Submitted,

ANDERECK, EVANS, MILNE PEACE & JOHNSON By:

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Craig S. Johnson, MO Bar #28179 Lisa Cole Chase, MO Bar #51502 Col. Darwin Marmaduke House 700 East Capitol Avenue P.O. Box 1438 Jefferson City, MO 65102 Telephone: 573/634-3422 Facsimile: 573/634-7822 email: <u>CJohnson@aempb.com</u> email: <u>lisachase@aempb.com</u>

ATTORNEYS FOR MoKan Dial, Inc.

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 4 day of April, 2005, to:

Michael Dandino Office of the Public Counsel P.O. Box 2230 Jefferson City, MO 65102

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

W.R. England, IIIBrian McCartneyBrydon, Swearengen & England, P.C.312 E. Capitol Ave.Jefferson City, MO 65102

Paul Lane Leo Bub Mimi B. MacDonald SBC Missouri One Bell Center, Room 3510 St. Louis, Missouri 63101

Larry Dority Fischer & Dority, P.C. 101 Madison, Suite 400 Jefferson City, Mo 65101