

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Request for Expansion of the	)	
Kansas City Metropolitan Calling Area Plan to Include	)	<b><u>Case No. TO-2005-0142</u></b>
Exchange of Lexington as Part of the MCA Tier 5.	)	

**APPLICATION TO INTERVENE**

COME NOW Cass County Telephone Company ("Cass County"), Craw-Kan Telephone Cooperative, Inc. ("Craw-Kan"), Citizens Telephone Company of Higginsville, Mo. ("Citizens"), 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:

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3. Citizens provides telecommunications services in an exchange adjacent to the Lexington exchange that has been identified for possible addition to the Metropolitan Calling Area (MCA). Craw-Kan provides service in an exchange adjacent to the present MCA boundary. Any expansion of calling scopes or the MCA Plan in this case could result in requests for expansion of calling scopes or the MCA Plan to Citizens' and Craw-Kan's exchanges. 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 MCA 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

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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 30<sup>th</sup> day of March, 2005, to:

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