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April 6, 2005

FILED³

APR 06 2005

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Missouri Public
Service Commission

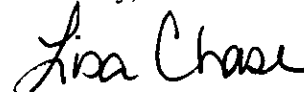
**Re: In the Matter of A Request For the Modification of the Kansas City
Metropolitan Calling Area Plan. Case No. TO-2005-0144**

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
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APR 06 2005

Missouri Public
Service Commission

Case No. To-2005-0144

SUBSTITUTE APPLICATION TO INTERVENE

COMES NOW MoKan Dial, Inc. (“MoKan”) pursuant to 4 CSR 240-2.075, and hereby file this Substitute Application to Intervene. In support thereof, MoKan states as follows:

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

Craig S. Johnson
Lisa Cole Chase
Andereck Evans Milne Peace & Johnson, LLC
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3. On November 22, 2004, the Office of Public Counsel (“OPC”) filed a request for the mandatory addition of the Greenwood exchange to the Kansas City MCA

Tier 2. 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. MoKan presently offers MCA service to its local exchange customers in the Kansas City MCA, and any changes to the present MCA plan could have an impact on MaKan's cost of providing service. Therefore, MoKan has an interest in this proceeding which is different from that of the general public, and MoKan'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, MoKan's substitute application to intervene, which deletes reference to "monitoring", will serve the public interest. MoKan does not have a position on the case at this time.

WHEREFORE, on the basis of the foregoing, MoKan Dial, Inc. respectfully requests that this substitute application to intervene and participate as a party be granted.

Respectfully Submitted,

ANDERECK, EVANS, MILNE
PEACE & JOHNSON

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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 6 day of April, 2005, to:

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