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

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

JOSEPH M. PAGE

LISA C. CHASE

JUDITH E. KOEHLER

ANDREW J. SPORLEDER

JASON A. PAULSMEYER

BRYAN D. LADE

CONNIE J. MORLEY

R. AARON MARTINEZ

DUSTIN G. DUNKLEE

AMANDA N. KLEIN

MARVIN L. SHARP, Of Counsel

PHIL HAUCK (1924-1991)

December 20, 2004

FILED

DEC 2 0 2004

EUGENE E. ANDERECK (1923-2004) GREGORY C. STOCKARD (1904-1993)

Secretary

TERRY M. EVANS

ERWIN L. MILNE

CRAIG S. JOHNSON

RODRIC A. WIDGER

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT

COREY K. HERRON

MATTHEW M. KROHN

LANETTE R. GOOCH

SHAWN BATTAGLER

GEORGE M. JOHNSON

JACK PEACE

**Public Service Commission** 

P.O. Box 360

Jefferson City, Missouri 65102

Missouri Public Service Commission

Re:

In the Matter of a Request for Expansion of the St. Louis Metropolitan Calling Area Plan to Include the Exchanges of Washington, Union, Wright City, St. Clair,

Marthasville, Beaufort, Foley, and Warrenton

Dear Secretary:

Enclosed for filing please find an original and eight copies of the MITG's Notice of Participation in the above referenced case.

If you have any questions, please contact me at the number listed above.

BDL:lw

Encl.

CC:

Office of the Public Counsel

General Counsel, PSC Mimi McDonald MITG Managers

FILED

## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

IN THE MATTER OF A REQUEST FOR	)	
<b>EXPANSION OF THE ST. LOUIS</b>	)	
METROPOLITAN CALLING AREA PLAN	j	Case No. TO-2005-0141
TO INCLUDE THE EXCHANGES OF	)	
WASHINGTON, UNION, WRIGHT CITY, ST.	ĺ	
CLAIR, MARTHASVILLE, BEAUFORT,	)	
FOLEY, AND WARRENTON	ĺ	

## **NOTICE OF PARTICIPATION**

COMES NOW the Missouri Independent Telephone Company Group ("MITG")<sup>1</sup> and hereby notifies the Commission and other parties of their intention to participate without intervention in the above captioned matter. In support of this Notice, the MITG states as follows:

- 1. The MITG companies provide local, basic local, and exchange access services to customers in the rural exchanges throughout Missouri. Some of these exchanges are currently included in MCAs in Kansas City and Springfield. Other companies have an interest in creating expanded calling areas in their service areas outside the MCAs. The MITG seeks to intervene to monitor this proceeding, because the principles adopted in this case could equally apply to the MITG companies at a future point in time.
- 2. The MITG companies are subject to the regulatory supervision of the Missouri Public Service Commission.
- 3. Copies of all filings in this docket should be directed to the MITG by serving:

Craig S. Johnson Bryan D. Lade Andereck Evans Milne Peace & Johnson, LLC P.O. Box 1438 Jefferson City, MO 65201 (573) 634-3422

<sup>&</sup>lt;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.

(573) 634-7822 fax

4. 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.

5. The MITG companies are such affected carriers and therefore the MITG should be allowed to participate in a monitoring role. While the MITG does not have a direct interest in the expansion of the St. Louis MCA, it does have an interest different than the general public, specifically, the MITG serves customers in an exchanges currently included in the Kansas City MCA and Springfield MCA, and others may, at some future time, become part of other expanded local calling scopes or MCAs.

WHEREFORE, on the basis of the foregoing, the MITG respectfully requests its notice to participate without intervention is recognized and that the MITG be added to the official service list in this matter.

Respectfully Submitted,

ANDERECK, EVANS, MILNE PEACE & JOHNSON

Bv:

Craig S. Johnson, MO Bar #28179 Bryan D. Lade, MO Bar #55232 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>BLade@aempb.com</u>

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 20<sup>th</sup> day of December, 2004, to:

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

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 Mimi B. MacDonald SBC Missouri One Bell Center, Room 3510 St. Louis, Missouri 63101

Attorney for The Mi