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December 20, 2004

FILED

DEC 20 2004

EUGENE E. ANDERECK (1923-2004)
GREGORY C. STOCKARD (1904-1993)
PHIL HAUCK (1924-1991)

Secretary
Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

**Missouri Public
Service Commission**

Re: In the Matter of a Request for the Modification of the Kansas City Metropolitan
Calling Area Plan to Make the Greenwood Exchange Part of the Mandatory MCA
Tier 2

Dear Secretary:

Enclosed for filing please find an original and eight copies of the Moka Dial, Inc.,
Application to Intervene in the above referenced case.

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

Sincerely,


Bryan D. Lade

BDL:lw

Encl.

CC: Office of the Public Counsel
General Counsel, PSC
Mimi McDonald
Jane Prettyman

FILED

DEC 20 2004

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

Missouri Public
Service Commission

IN THE MATTER OF A REQUEST FOR THE)
MODIFICATION OF THE KANSAS CITY)
METROPOLITAN CALLING AREA PLAN)
TO MAKE THE GREENWOOD EXCHANGE)
PART OF THE MANDATORY MCA TIER 2)

Case No. TO-2005-0144

APPLICATION TO INTERVENE

COMES NOW MoKan Dial, Inc. ("MoKan") and hereby moves to intervene in this proceeding. In support of this Application, MoKan states as follows:

1. MoKan provides local, basic local, and exchange access services to customers in the Freeman exchange. The Freeman exchange is located in the Kansas City MCA. MoKan seeks to intervene to monitor this proceeding because the principles adopted could equally apply to MoKan at a future point in time.

2. MoKan is subject to the regulatory supervision of the Missouri Public Service Commission.

3. Copies of all filings in this docket should be directed to MoKan 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
(573) 634-7822 fax

4. 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.

5. MoKan is such an affected carrier and therefore should be included as a party in this case. MoKan has an interest different than the general public, specifically, MoKan serves customers in an exchange currently included in the Kansas City MCA.

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

Respectfully Submitted,

ANDERECK, EVANS, MILNE
PEACE & JOHNSON

By: 
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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 20th 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

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