

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

In the Matter of a Request for the modification	)	
Of the Springfield Metropolitan Calling Area	)	
Plan to Make the Ozark Exchange a Mandatory	)	<b><u>Case No. TO-2005-0143</u></b>
MCA Tier 1 Exchange.	)	

**APPLICATION TO INTERVENE  
OF  
ALLTEL MISSOURI, INC.**

**COMES NOW** ALLTEL Missouri, Inc. ("ALLTEL"), pursuant to 4 CSR 240-2.075, and respectfully applies to intervene and to become a party herein. In support thereof, ALLTEL states as follows:

1. ALLTEL Missouri, Inc. is a Missouri corporation, and a Certificate of Corporate Good Standing from the Missouri Secretary of State, dated October 2, 2001, was attached to the application filed in Case No. TO-2002-169, which is incorporated herein by reference. ALLTEL is an incumbent local exchange telecommunications company, authorized to provide basic local exchange telecommunications service in Missouri. ALLTEL is a "telecommunications company" and "public utility" as those terms are defined by Section 386.020, RSMo. 2000, and is therefore subject to the jurisdiction and regulation of the Commission as provided by law.

2. All communications, correspondence, pleadings, orders and decisions regarding this proceeding should be directed to:

Larry W. DORITY  
FISCHER & DORITY, P.C.  
101 Madison, Suite 400  
Jefferson City, MO 65101  
(573) 636-6758  
(573) 636-0383 (fax)

Lawrence J. Krajci  
ALLTEL  
One Allied Drive  
P.O. Box 2177  
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3. On November 22, 2004, the Office of the Public Counsel filed a motion requesting that the Commission modify the Springfield Metropolitan Calling Area (MCA) Plan to change the Ozark exchange from an optional Tier 3 exchange to a mandatory Tier 1 exchange. By its Order Denying Motion to Dismiss, Directing Notice, Setting an Intervention Deadline, and Scheduling a Conference issued in this matter on March 10, 2005, the Commission ordered that any party wishing to intervene in this matter shall file an application to do so no later than March 30, 2005.

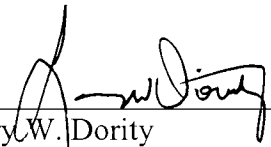
4. ALLTEL provides local exchange telecommunications service in exchanges currently included in the Springfield MCA Plan. Whereas the Commission may modify or alter the existing Springfield MCA Plan in this proceeding, ALLTEL seeks to intervene to monitor this proceeding because the principles and public policies adopted could equally apply to ALLTEL at a future point in time. As a result, ALLTEL has an interest in this proceeding that is different from that of the general public and which may be adversely affected by a final order arising from this case. In addition, granting this intervention will be in the public interest because ALLTEL will bring to this proceeding its expertise in the areas being investigated and its experience as a

telecommunications provider. Finally, no other party to this proceeding will adequately protect ALLTEL's interests.

5. In accordance with 4 CSR 240-2.075(2), ALLTEL is unsure of the position it will take in this proceeding.

WHEREFORE, ALLTEL Missouri, Inc. respectfully requests the Commission to grant its Application to Intervene, together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,



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Attorneys for ALLTEL Missouri, Inc.

## CERTIFICATE OF SERVICE

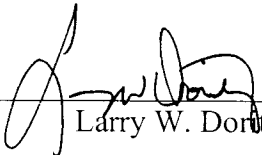
I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 30th day of March, 2005, to:

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P.O. Box 7800  
Jefferson City MO 65102

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Missouri Public Service Commission  
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Larry W. Darity