

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

In the Matter of the Determination of the)	
Weighted, Statewide Average Rate of)	Case No. TO-2006-0084
Nonwireless Basic Local Telecommunications)	
Services.)	

**ALLTEL MISSOURI, INC.'S
APPLICATION TO INTERVENE**

COMES NOW Alltel Missouri, Inc. ("Alltel"), pursuant to Commission Rule 4 CSR 240-2.075 and the Commission's *Order Establishing Intervention Deadline and Requiring Filing ("Order")* issued in this matter on September 8, 2005, and respectfully submits its Application to Intervene in the above-captioned case. In support of its Application, Alltel state that:

1. Alltel Missouri, Inc. is a Missouri corporation authorized to do business in Missouri. Alltel is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those terms are defined in Section 386.020, RSMo. 2000.

2. All correspondence, communications, and orders and decisions of the Commission issued in this matter should be sent to:

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3. This case arose from the filing, on August 19, 2005, of a Motion to Open Case and Motion for Protective Order by the Commission's Staff, so as to provide a vehicle for the Commission to determine the average rate of nonwireless basic local telecommunications services as of August 28, 2005, pursuant to new subsection 13 to Section 392.245. By its Notice Opening Case issued on August 29, 2005, the Commission stated that "Pursuant to Senate Bill No. 237, an act relating to telecommunications companies, the Commission is to determine the average rate of nonwireless basic local telecommunications services; therefore, a new case has been opened." The Commission's September 8, 2005 Order directed that any party wishing to intervene in the case should file an application to do so by not later than September 28, 2005.

4. The Commission should permit Alltel to intervene in this case pursuant to Commission Rule 4 CSR 240-2.075(4)(A) because Alltel's interests differ from those of the general public. As a local exchange telecommunications company, Alltel is one of those companies that have been ordered to submit to the Commission's Staff the information referred to in the Commission's Order. No other party to this proceeding will adequately represent or protect Alltel's interests. At this point in time, Alltel is unsure of the position it will take in this proceeding.

5. Alltel's intervention would be in the public interest, in accordance with Commission Rule 4 CSR 240-2.075(4)(B), as its participation in this case will contribute to the implementation of new Subsection 392.245.13.

WHEREFORE, Alltel Missouri, Inc. respectfully requests that the Commission grant its Application to Intervene in the above-captioned case.

Respectfully submitted,

/s/ Larry W. Dority

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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 26th day of September, 2005, to:

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/s/ Larry W. Dority
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