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February 19, 2004

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

**FILED**

FEB 19 2004

Re: Case No. AO-2004-0036

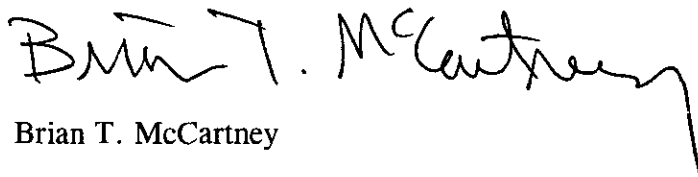
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing on behalf of Green Hills Telephone Corporation, Citizens Telephone Company of Higginsville, Missouri, Cass County Telephone, Lathrop Telephone Company, and KLM Telephone Company, please find an original and eight (8) copies of an Application to Intervene.

Please see that this filing is brought to the attention of the appropriate Commission personnel. I thank you in advance for your cooperation in this matter.

Sincerely,



Brian T. McCartney

BTM/lar  
Enclosure

cc: Dan Joyce  
John Coffman  
Mark Comley  
Leo Bub

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED  
FEB 19 2004

Missouri Public  
Service Commission

In the Matter of the Assignment )  
of the 2-1-1 Abbreviated Dialing ) Case No. AO-2004-0036  
Code in the State of Missouri )

**APPLICATION TO INTERVENE**

COME NOW, Green Hills Telephone Corporation, Citizens Telephone Company of Higginsville, Missouri, Cass County Telephone, Lathrop Telephone Company, and KLM Telephone Company (hereinafter referred to as "Applicants"), pursuant to 4 CSR 240-02.075 and for their application to intervene, state as follows:

1. The Heart of America United Way, Inc. has filed an Application with the Commission requesting Commission authority to be designated as a 2-1-1 communication information and referral provider in SBC Missouri exchanges in 16 western Missouri counties on a pilot basis, with the opportunity to serve other counties in the future. On February 2, 2004, the Commission issued its Order Directing Notice in which interested parties were given until February 22, 2004, to file an application to intervene.

2. Applicants currently provide telecommunications services to members of the public located in those areas certificated to them by the Missouri Public Service Commission ("Commission"). Applicants provide "basic local telecommunications services" within those exchanges as defined by their respective tariffs which are on file with and approved by the Commission. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020, RSMo 2000, and are, therefore, subject to the jurisdiction, regulation and control of the Commission

as provided by law. Applicants are small local exchange companies as defined in § 386.020(30), RSMo 2000.

3. Applicants provide local exchange service in the counties that will be affected by any decision in this matter, and thus applicants have an interest which is different from that of the general public and granting the intervention will serve the public interest.

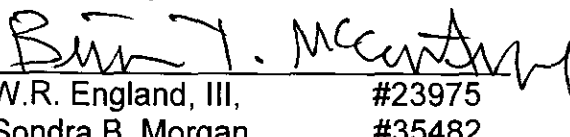
4. At this time, Applicants are unsure of the position they will take in this case.

5. All correspondence, communications, orders and decisions in this matter should be addressed to the following:

W. R. England, III  
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Brian T. McCartney  
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[bmccartney@brydonlaw.com](mailto:bmccartney@brydonlaw.com) (e-mail)

WHEREFORE, the Applicants respectfully request that the Commission issue an order authorizing them to intervene in the above-captioned proceedings and for such other orders as are reasonable in the circumstances.

Respectfully submitted,

  
W.R. England, III, #23975  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was forwarded by first class mail, hand delivery or electronically on this 19<sup>th</sup> day of February, 2004 to:

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Missouri Public Service Commission  
200 Madison Street, 8<sup>th</sup> Floor  
Jefferson City, MO 65101

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