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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri Public Service Commission

In the Matter of Mid-Missouri Telephone)	Case No. IT-2003-0376
Company's Wireless Termination Tariff)	Tariff No. JI-2003-1667

SPRINT'S APPLICATION TO INTERVENE

COMES NOW Sprint Spectrum L.P. d/b/a Sprint PCS ("Sprint") and respectfully submits its Application to Intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of its Application, Sprint PCS states as follows:

- 1. On March 5, 2003, Mid-Missouri Telephone Corporation ("Mid-Missouri") filed a proposed Wireless Termination Service Tariff. On March 20, 2003, Chariton filed substitute pages. The tariff covers charges for the termination of wireless calls in Mid-Missouri's service area. The tariff is similar in many respects to tariffs approved by the Commission in TT-2001-139. Sprint objected to the approval of those tariffs and is currently involved in the appeal of the approval.
- 2. On April 6, 2003, the Commission suspended Mid-Missouri's proposed tariff for 60 days after the effective date, or until June 5, 2003. To date, to Sprint's knowledge, no other party has intervened.
- 3. In this application, Sprint seeks to intervene in this case. Sprint is a Commercial Mobile Radio Service provider as that term is defined in the Federal Telecommunications Act and is subject to the jurisdiction of the Federal Communications Commission. ("FCC") Further, Sprint is a limited partnership organized under the laws of the state of Delaware. Sprint is duly authorized to conduct business in Missouri with its principal office located at 6200 Sprint Parkway, Overland Park, Kansas 66251.

Sprint's interest in this proceeding is different from that of the general

public. Sprint will be impacted by the Commission's decision in this case as the subject

tariffs apply to its traffic within Missouri. Further, while Sprint maintains its objection to

the approval of any tariff similar to the ones approved in TT-2001-139, the tariff in this

case raises an additional unique issue – the ability of the incumbent carrier to unilaterally

set an interMTA factor in violation of the standards set by the FCC. Specifically, the

FCC has ruled that "the location of the initial cell site when the call begins shall be used

as the determinate of the geographic location of the customer." (See First Report and

Order at Para 1044). The methodology for identifying the MTA factor put forth by Mid-

Missouri is not consistent with this ruling.

4.

5. Granting Sprint's Application to Intervene will also be in the public

interest because Sprint will bring to this proceeding its expertise in the areas being

investigated and its experience as a CMRS provider.

6. Pursuant to 4 CSR 240-2.075(2), Sprint states that it opposes the tariff

revisions under review in this case.

7. All correspondence, pleadings, orders, decisions and communications

regarding this proceeding should be sent to:

Lisa Creighton Hendricks

Attorney for Sprint

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WHEREFORE, Sprint respectfully requests that the Commission grant this Application to Intervene, together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

SPRINT

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VERIFICATION

I, Lisa Creighton Hendricks, an attorney for Sprint, hereby verify and affirm that I have read the foregoing Application of Sprint Spectrum L.P. d/b/a/ Sprint PCS for intervention and that the statements contained therein are true and correct to the best of my information and belief.

Lisa Creighton Hendricks Senior Attorney, SPRINT

Subscribed and sworn to before me this 11 day of

, 2003

Notary Public

HOOMINALE TROPPNIAN

Ty Appl. Exp. 4/3/04 CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was served on each of the following parties by first-class/electronic/facsimile mail, this 17th day of April, 2003.

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