

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

DEC 14 2004

Missouri Public
Service Commission

Petition of FullTel, Inc. for Approval of an)
Interconnection Agreement Pursuant to) Case No. TK-2005-0079
Section 252 of the Communications Act)
of 1934, as Amended)

**JOINT RESPONSE TO ORDER DIRECTING FILING
OF CENTURYTEL OF MISSOURI, LLC AND
SPECTRA COMMUNICATIONS GROUP, LLC D/B/A CENTURYTEL**

COME NOW CenturyTel of Missouri, LLC ("CenturyTel") and Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra"), pursuant to the Missouri Public Service Commission's ("Commission") *Order Directing Filing And Making Spectra Communications Group, LLC d/b/a CenturyTel A Party* ("Order") entered in this matter on October 26, 2004, and for their Joint Response respectfully state as follows:

1. The Commission's Order directed the parties to explain (a) whether 47 U.S.C. § 252(e)(4) requires this Commission to act within 90 days of FullTel's petition, and (b) the relationship, if any, between CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel.

2. CenturyTel and Spectra respectfully concur in, and adopt by reference, the Staff Memorandum filed this date by the Staff of the Missouri Public Service Commission. The Staff addresses the two issues at Paragraphs 11 and 12 of its Memorandum. Staff notes that "According to Spectra's 2003 Annual Report to the Commission (BMAR-2004-0724), CenturyTel, Inc. owns 99.92104% of Spectra." (Staff Memorandum, pages 2-3). Spectra would point out that since the time of filing its 2003 Annual Report, CenturyTel, Inc. now owns 100% of Spectra.

Exhibit No. 10
Case No(s). CO-2005-0066
Date 11-12-04 Rptr TU

3. As the Commission's records clearly reveal, CenturyTel and Spectra received separate certificates of service authority to provide basic local telecommunications services in Missouri, and provide such services in accordance with separate tariffs approved by this Commission.¹

4. The Staff Memorandum states at Paragraph 10: "By its Order in Case No. LA-2005-0055, effective October 29, 2004, the Commission granted FullTel certificate of service authority to provide basic local telecommunications service, nonswitched local exchange service, and interexchange service. Indeed, FullTel recognizes the separate certificates and tariffs of CenturyTel and Spectra in its own Application for Certificate of Service Authority filed on August 31, 2004 in Case No. LA-2005-0055:

With respect to the geographic coverage area for its basic local telecommunications services, FullTel requests authority to operate as a competitive basic local exchange carrier in all areas defined by the existing exchange areas in which SWBT, **CenturyTel, Spectra Communications** and Sprint are authorized to operate in Missouri. The SWBT, **CenturyTel, Spectra Communications** and Sprint exchanges in which Applicant seeks authority to provide basic local exchange services in Missouri are set forth in the tariffs of SWBT, **CenturyTel, Spectra Communications** and Sprint respectively. (Emphasis added).²

The Commission's Order in that proceeding granted FullTel its certificate of service authority in accordance with such request.

¹ See, Case Nos. TM-2000-182 and Case No. TM-2002-232.

² FullTel Application, Case No. LA-2005-0055, Paragraph 4, page 2.

WHEREFORE, CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel respectfully file their Joint Response herein, and again move that the Commission reject FullTel's proposed adoption and application of the GTE and Brooks Fiber Interconnection Agreement to CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel.

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 5th day of November, 2004, to:

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