BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of CenturyTel of Missouri, LLC)	
d/b/a CenturyTel and Spectra Communications)	
Group, LLC d/b/a CenturyTel Tariff Filings to)	Case No. TC-2007-0307
Grandfather Remote Call Forwarding Services)	
To Existing Customers and Existing Locations.)	

Application to Intervene of Chariton Valley Telecom Corporation and Mark Twain Communications Company

Come now Chariton Valley Telecom Corporation and Mark Twain

Communications Company, for their joint Application to Intervene in Opposition to the proposed tariffs of CenturyTel and Spectra, and state as follows:

- 1. Chariton Valley Telecom Corporation (Chariton Valley) is a competitive local exchange company competing with Spectra Communications Group, LLC, d/b/a CenturyTel (Spectra) in Macon, Missouri. Chariton Valley has been certificated by this Commission to provide telecommunications service, is a competitor of Spectra, has negotiated an interconnection agreement with Spectra, and has had this agreement approved by the Commission.
- 2. Mark Twain Communications Company (Mark Twain) is a competitive local exchange company competing with Spetra Communications Group, LLC, d/b/a CenturyTel (Spectra) in northeast Missouri. Mark Twain has been certificated by this Commission to provide telecommunications service, is a competitor of Spectra, has negotiated an interconnection agreement with Spectra, and has had this agreement approved by the Commission.

3. Copies of all filings in this docket should be directed to Chariton Valley and Mark Twain by serving:

Craig S. Johnson Mo Bar # 28179 1648-A East Elm St. Jefferson City, MO 65101 (573) 632-1900 (573) 634-6018 (fax) craig@csjohnsonlaw.com

- 4. This case was created as a result of Socket Telecom, LLCs and Socket Internet's Request to Suspend or Reject proposed tariff sheets, as Ordered by this Commission's Order of February 15, 2007.
- 5. Remote call forwarding technology is a function presumably resident in and provided by Spectra's switches. It makes little business sense for a telecommunications company not to offer a function resident in its switch. Chariton Valley and Mark Twain can see no reason for limiting or "grandfathering" the use of remote call forwarding, other than limiting or hindering competitors and competition, which is inappropriate. Chariton Valley and Mark Twain oppose the proposed tariff.
- 6. Chariton Valley utilizes remote call forwarding services provided by Spectra in some instances in conjunction with local number porting. Specifically, when a targeted deadline for porting a number from Spectra to Chariton Valley is missed, remote call forwarding is used to assure the customer continues to receive calls. Chariton Valley has an interest in continuing to utilize Spectra remote call forwarding services to assure that Chariton Valley customers receive all calls made to them.
- 7. Mark Twain utilizes remote call forwarding services provided by Spectra.

 Remote call forwarding services are used to complete calls made to former telephone

numbers of customers acquired by Mark Twain from Spectra. Under the interconnection agreement between Spectra and Mark Twain, there are intercompany payments also tied to the use of remote call forwarding. Mark Twain has an interest in continuing to utilize remote call forwarding both to assure its customers receive quality service, as well as assuring its interconnection agreement with Spectra is available and enforceable in all respects.

- 8. Chariton Valley and Mark Twain are concerned that one effect of approval of the tariffs at issue herein may be the loss of Spectra remote call forwarding services as set forth above.
- 9. As set forth above, the interests of Chariton Valley and Mark Twain are different from those of the general public.
- 10. Chariton Valley and Mark Twain have experience and insights with respect to this tariff filing that may assist the Commission in understanding the impacts of the issues raised by tariff filing at issue herein.
- 11. Chariton Valley and Mark Twain are aware of the February 28, 2007 prehearing conference scheduled by the Commission's Order of February 15, and counsel for Chariton Valley and Mark Twain is available and plans to attend that prehearing conference. Granting of this Intervention will not prejudice the rights of the present parties.
 - 11. Granting this intervention application is in the public interest.

WHEREFORE, on the basis of the foregoing, Chariton Valley and Mark
Twain respectfully request that this joint application to intervene and participate as party
intervenors be granted.

/s/ Craig S. Johnson Craig S. Johnson, Atty. Mo Bar # 28179 1648-A East Elm St. Jefferson City, MO 65101 (573) 632-1900 (573) 634-6018 (fax) craig@csjohnsonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was electronically mailed to the following attorneys of record in this proceeding this 21st day of February, 2006:

David Meyer Michael Dandino Carl Lumley Larry Dority Arthur Martinez

> /s/ Craig S. Johnson Craig S. Johnson