

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Agreement between)
SBC Communications, Inc. and Sage) Case No. TO-2004-0576
Telecom, Inc.,)

NUVOX COMMUNICATIONS OF MISSOURI, INC.'s
REQUEST TO INTERVENE

COMES NOW NuVox Communications of Missouri, Inc. (NuVox) pursuant to 4 CSR 240-2.075, and for its Request to Intervene states to the Commission:

1. NuVox is a competitive telecommunications company duly incorporated and existing under and by virtue of the laws of the State of Delaware and authorized to do business in the State of Missouri as a foreign corporation. Its principal Missouri offices are currently located at 16090 Swingley Ridge Road, Suite 500, Chesterfield, Missouri 63017. NuVox is an authorized provider of intrastate local exchange and interexchange telecommunications services in Missouri under certificates granted and tariffs approved by the Commission. NuVox is also an authorized provider of interstate telecommunications services in Missouri under the jurisdiction of the Federal Communications Commission.

2. All communications and pleadings in this case should be directed to:

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3. On or about May 6, 2004 the Commission issued a Notice of New Case in order to consider and investigate an agreement between SBC Communications, Inc. and Sage Telecom, Inc.

4. NuVox seeks to intervene in this proceeding because the Commission's decision could adversely affect NuVox's interests as a provider of local telecommunications services, in particular with respect to NuVox's rights under Section 252, subsections (e) and (i) of the Telecommunications Act of 1996. The Commission should only approve agreements that comply with subsection (e) and should make sure that agreements are available under subsection (i).

5. NuVox's interests as a telecommunications company are different from those of the general public. Furthermore, NuVox's intervention in this proceeding is in the public interest because of NuVox's interest in enhancing competition and because of its expertise in the telecommunications industry. NuVox supports issuance of an order requiring SBC Missouri and Sage to file their agreements with the Commission, as explained in Comments filed contemporaneously with this Request.

WHEREFORE, NuVox Communications of Missouri, Inc., respectfully requests the Commission to issue its order granting NuVox's Request to Intervene.

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 20th day of May, 2004, by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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