

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of)	
Northwest Missouri Cellular Limited)	
Partnership for Designation as a)	
Telecommunications Company Carrier)	Case No. TO-2005-0466
Eligible for Federal Universal Service)	
Support pursuant to Section 254 of the)	
Telecommunications Act of 1996.)	

APPLICATION TO INTERVENE

COME NOW Spectra Communications Group, LLC d/b/a CenturyTel (“Spectra”), and CenturyTel of Missouri, LLC (“CenturyTel”), pursuant to the Commission’s *Order Directing Notice* issued in the above-captioned case on June 7, 2005 and 4 CSR 240-2.075, and for their Application To Intervene respectfully state as follows:

1. Spectra is a Delaware Limited Liability Company, and a Commission-regulated incumbent local exchange telecommunications company, authorized to do business in Missouri as evidenced by the certificate of authority issued by the Missouri Secretary of State which was filed in Case No. TM-2000-182 and incorporated herein by reference. Spectra operates in Missouri using the fictitious name of “CenturyTel”, pursuant to the registration of fictitious name filed in Case No. TO-2001-437 and incorporated herein by reference. Pursuant to the Commission’s *Order Designating Spectra Communications Group, LLC, As Eligible Carrier* in Case No. TA-2000-817, Spectra is designated as a telecommunications carrier eligible to receive federal universal service support. Spectra provides basic local exchange and intrastate interexchange telecommunications services in Missouri pursuant to certificates of service authority issued and tariffs approved by this Commission. Spectra also is a “telecommunications

company” and a “public utility” as those terms are defined in Section 386.020 RSMo 2000 and is therefore subject to the jurisdiction, regulation and control of the Commission as provided by Missouri law.

2. CenturyTel is a Louisiana Limited Liability Company, and a Commission-regulated incumbent local exchange telecommunications company, authorized to do business in Missouri as evidenced by the certificate of authority issued by the Missouri Secretary of State which was filed in Case No. TM-2002-232 and incorporated herein by reference. On August 30, 2002, CenturyTel purchased the local exchange property of GTE Midwest Incorporated d/b/a Verizon Midwest, pursuant to the Commission’s Report and Order issued on May 21, 2002 in Case No. TM-2002-232. In that case, the Commission authorized CenturyTel to provide basic local and interexchange telecommunications services in Missouri and it designated CenturyTel as a telecommunications carrier eligible to receive federal universal service support. CenturyTel also is a “telecommunications company” and a “public utility” as those terms are defined in Section 386.020 RSMo 2000 and is therefore subject to the jurisdiction, regulation and control of the Commission as provided by Missouri law.

3. All communications, correspondence, pleadings, notices and orders relating to this application should be sent to:

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With a copy sent to:

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4. On June 3, 2005 Northwest Missouri Cellular Limited Partnership (“Northwest Cellular”) filed an Application with the Commission for designation as an eligible telecommunications carrier (“ETC”) for purposes of qualifying to obtain federal universal service support within the specified service areas of certain incumbent local exchange telecommunications companies within the state of Missouri. Northwest Cellular is not certificated by the Commission to provide basic local telecommunications services, and the services it does provide do not fall within the definition of “telecommunications service” as that term is defined in Section 386.020 RSMo 2000.

5. On June 7, 2005 the Commission issued its *Order Directing Notice* wherein, *inter alia*, it set an intervention deadline of June 27, 2005. Spectra and CenturyTel’s Application To Intervene is therefore timely filed.

6. Spectra and CenturyTel’s interest in this case and reasons for seeking intervention are similar to the reasons they set forth in all the other ETC proceedings which have recently been or are now before the Commission. In all those cases, either Spectra or CenturyTel, or both, have been permitted to intervene and fully participate in the proceedings. Spectra alone is the largest recipient of universal service funds in the state. Accordingly, Spectra and CenturyTel have consistently taken the position that all ETCs should be held accountable for the Universal Service Fund (“USF”) funding they might receive, regardless of the technology employed (wireless or wireline). Because of the significance and importance of the still developing policy issues involved, and the

need to insure that “piecemeal” ETC regulations are not adopted in Missouri, Spectra and CenturyTel have taken an active role in the development of the Commission’s proposed ETC certification rulemaking activities and will continue to do so. Spectra and CenturyTel believe that this Commission in the meantime should insure that at least the minimum standards thus far set forth by the Federal Communications Commission are adopted by this Commission in all ETC application cases, including the case at hand. The USF, in order to remain viable, must be both sufficient and predictable. Spectra and CenturyTel are concerned about adequate and continued USF support for its own customers in light of all the various competitive ETC filings in Missouri alone within the first half of 2005.

7. At this time, and based on the information now available, Spectra and CenturyTel oppose the relief sought by Northwest Cellular in this proceeding but reserve the right to modify their position as more information is made available.

8. Accordingly, Spectra and CenturyTel have a direct interest in this proceeding which is different from that of the general public and which could be adversely affected by a final order arising out of this case. No other party can adequately represent Spectra’s and CenturyTel’s interests in this case. Spectra’s and CenturyTel’s experience as incumbent local exchange providers, and Spectra status as the state’s largest ETC recipient, makes granting Spectra’s and CenturyTel’s intervention in this proceeding in the public interest.

9. Spectra and CenturyTel do not have any pending action or final unsatisfied judgments or decisions against them from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within

three (3) years of the date of this Application. Neither do Spectra or CenturyTel have any annual report or assessment fees that are overdue.

WHEREFORE, having complied with the requirements of 4 CSR 240-2.075, Spectra Communications Group, LLC, d/b/a CenturyTel and CenturyTel of Missouri, LLC respectfully requests that the Commission grant this Application To Intervene in this proceeding.

Respectfully submitted,

/s/ Charles Brent Stewart

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CENTURYTEL OF MISSOURI, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Application To Intervene was sent to counsel for all parties of record in Case No. TO-2005-0466 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 27th day of June, 2005.

/s/ Charles Brent Stewart
