

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Review of the Competitive)
Classification of the Exchanges of Spectra) **Case No. IO-2008-0097**
Communications Group, LLC, d/b/a CenturyTel)

OFFICE OF THE PUBLIC COUNSEL'S REQUEST FOR AN EVIDENTIARY HEARING

The Office of the Public Counsel requests that the Public Service Commission hold an evidentiary hearing to review the Staff's Report on the review of Competitive Classifications of Exchanges of Spectra Communications Group, LLC, d/b/a CenturyTel so that there will be a full and complete evidentiary record upon which the Commission can issue findings of facts and conclusions of law to either support the continuation of the competitive classification in these exchanges or to return the exchanges to price cap regulation.

The Office of Public Counsel objects to determining the continuation of competitive classification based only on the Staff's Report and without an evidentiary hearing. Public Counsel asks the Public Service Commission to require strict proof of compliance with the requirements of Section 392.245, RSMo 2000 (as amended 2005).

The continued classification of these rural exchanges as competitive has significant impact on the customers in these communities in that they will be deprived of the price cap protection of a 5% limit on nonbasic services and the annual limit on basic local service of the Consumer Price Index-Telecommunications Services. For that reason, Public Counsel urges the Commission to make a factual record of the proceeding which will serve as the basis of the Commission's decision.

Public Counsel urges the Commission to make as part of its record in this case the extent of competition offered by the providers designated in the report or operating within the exchanges to fully disclose the facts that demonstrate competition so that the Commission and the public will be advised of the competitive forces at work in these exchanges for these services.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Michael F. Dandino

BY: _____
Michael F. Dandino (Bar No. 24590)
Deputy Public Counsel
200 Madison Street, Suite 650
Jefferson City, MO 65102
Telephone: (573) 751-5559
Facsimile: (573) 751-5562
E-mail: mike.dandino@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed or hand delivered this 30th day of October, 2007 to the following:

General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

William Haas
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
william.haas@psc.mo.gov

Legal Department
CenturyTel of Missouri LLC
220 Madison Street
Jefferson City, MO 65101
arthur.martinez@centrytel.com

Larry Dority
Fischer & Dority
101 Madison Street, Suite 400
Jefferson City, MO 65101
lwdority@sprintmail.com

/s/ Michael F. Dandino
