

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

In the Matter of the Application of)
Missouri RSA No. 5 Limited Partnership)
For Designation as a Telecommunications) Case No. TO-2006-0172
Carrier 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 4 CSR 240-2.075 and the Commission’s October 20, 2005 *Order Directing Notice and Establishing Date For Intervention* (“Order”), 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 also 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.

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.

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

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3. On October 18, 2005, Missouri RSA No. 5 Partnership ("MO5") 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 rural and non-rural incumbent telephone

companies in the state of Missouri. In the Commission's October 20, 2005 Order, the Commission directed that any party wishing to intervene in this proceeding should file an application to do so no later than November 9, 2005.

4. MO5's ETC geographic service area request, as set forth in its Application and appendices, encompasses numerous wire centers or portions of wire centers, including those currently served by incumbent local exchange telecommunications companies Spectra (MO5 Application, Appendix D) and CenturyTel (MO5 Application, paragraph 8)¹.

5. Spectra and CenturyTel should be permitted to intervene in this case because to do so would be in the public interest. Both companies have a direct and significant interest in the operation of the Universal Service Fund and will bring to this proceeding extensive experience as incumbent providers and participants in the operation and administration of Universal Service Fund matters at both the state and federal level. The Commission recently granted intervention for Spectra and CenturyTel in the ETC application of Mid-Missouri Cellular, Case No. TO-2005-0325, and in the application of USCOC, Case No. TO-2005-0384, and should again do so in this proceeding. In addition, as significant contributors to the Universal Service Fund, both companies 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. Both companies' legal rights, duties and other legal interests will be substantially affected by the outcome of this proceeding and no other party can adequately represent Spectra's and CenturyTel's interests in this case.

¹ "Additionally, MO5 proposes to include a portion of the Century Telephone of Missouri (sic) (Central) non-rural Clark wire center".

6. In addition, with respect to Spectra, Spectra meets the federal definition of a rural telephone company in accordance with 47 U.S.C. Section 153(37) of the Telecommunications Act of 1996 (“the Act”). Accordingly, the Commission at minimum must find that designating MMC as an ETC in any portion of Spectra’s existing service area meets the public interest criterion set forth in Section 214(e)(2) of the Act.

WHEREFORE, having timely 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-2006-0172 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 8th day of November, 2005.

/s/ Charles Brent Stewart
