BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spectra Communications)
Group, LLC d/b/a CenturyTel's Request for) Case No. IO-2006-0108
Competitive Classification Pursuant to)
Section 392.245.5, RSMo. (2005).)

MOTION TO INTERVENE

COMES NOW, NPG Cable, Inc. d/b/a St. Joseph Cablevision, Inc. ("St. Joseph Cablevision") and hereby submits its Motion to Intervene in Case No. IO-2006-0108 pursuant to the Missouri Public Service Commission's Order Directing Notice, Establishing Procedural Schedule, and Reserving Hearing Date dated September 12, 2005 (the "Order").

- 1. St. Joseph Cablevision is an Arizona corporation qualified to do business in Missouri with principal offices located at 825 Edmond Street, St. Joseph, Missouri 64501.
- 2. St. Joseph Cablevision is filing this Motion to Intervene in accordance with the Order because Spectra Communications Group, LLC d/b/a CenturyTel is basing its request for competitive classification in the Savannah exchange on St. Joseph Cablevision's presence in the market. The resolution of this case will affect both St. Joseph Cablevision and its customers. St. Joseph Cablevision has an interest in this proceeding which is different from that of the general public, and St. Joseph Cablevision desires to protect its interests by being permitted to intervene in this case. St. Joseph Cablevision is unsure of the position it will take in this proceeding.

WHEREFORE, St. Joseph Cablevision respectfully requests the Commission to grant its Motion to Intervene.

Respectfully Submitted,

SPENCER FANE BRITT & BROWNE LLP

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ATTORNEYS FOR NPG CABLE, INC. d/b/a ST. JOSEPH CABLEVISION

CERTIFICATE OF SERVICE

I, Peter Mirakian III, hereby certify that a true and correct copy of the above and foregoing Motion to Intervene of NPG Cable, Inc. d/b/a St. Joseph Cablevision. in Case No. IO-2006-0108 was sent by electronic mail on this 16th day of September, 2005, to the following:

Colleen M. Dale, Secretary Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Larry W. Dority Fischer & Dority, P.C. 101 Madison, Suite 400 Jefferson City, MO 65101

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