

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

In the Matter of an Interconnection)
Agreement between Southwestern Bell)
Telephone, L.P., and Sage Telecom, Inc.)

Case No. TO-2005-0287

NUVOX COMMUNICATIONS OF MISSOURI, INC.'S
REQUEST FOR HEARING

Comes Now NuVox Communications of Missouri, Inc. pursuant to Order Directing Notice and Canceling Prehearing Conference issued by the Commission on March 1, 2005 and for its Request for Hearing states to the Commission:

1. NuVox appreciates the fact that the Commission did not allow this matter to proceed to conclusion "under the radar" when NuVox had made known its interest by participation in the prior proceedings (TO-2004-0576 and TO-2004-0584). NuVox made known its continuing interest during cross-examination of SBC witnesses in Case No. TO-2005-0035.

2. Pursuant to the Commission's notice and 47 USC 252(e), NuVox hereby requests a hearing in this matter.

3. As the Commission recognized in the prior proceedings, the subject documents comprise a single interconnection agreement. Staff has reiterated that position in its Application.

4. However, contrary to Staff's view, the subject interconnection agreement discriminates against telecommunications carriers that are not party thereto and additionally the agreement is not consistent with the public interest, convenience, and

necessity. Accordingly, under Section 252(e) the agreement (or at a minimum the offending portions) should be rejected.

5. NuVox suggests that the Commission set a telephonic prehearing conference on reasonable notice, so that the parties can develop a proposed schedule. Apparently, the agreement was filed on February 10, 2005. Under Section 252(e) the Commission only has until May 11, 2005 to complete these proceedings.

WHEREFORE, NuVox submits its request for hearing.

CURTIS, HEINZ,
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/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 4th day of March, 2005, either by e-mail or by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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