

**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 TO INTERVENE

COMES NOW NuVox Communications of Missouri, Inc. ("NuVox"), pursuant to 4 CSR 240-2.075 and the Order Directing Notice and Canceling Prehearing Conference issued by the Commission on March 1, 2005, and for its Request to Intervene states to the Commission:

1. NuVox is a competitive telecommunications company duly incorporated and existing under and by virtue of the laws of the State of Delaware and authorized to do business in the State of Missouri as a foreign corporation. Its principal Missouri offices are currently located at 16090 Swingley Ridge Road, Suite 500, Chesterfield, Missouri 63017. NuVox is an authorized provider of intrastate local exchange and interexchange telecommunications services in Missouri under certificates granted and tariffs approved by the Commission. NuVox is also an authorized provider of interstate telecommunications services in Missouri under the jurisdiction of the Federal Communications Commission.

2. All communications and pleadings in this case should be directed to:

Carl J. Lumley
Leland B. Curtis
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
314-725-8788
314-725-8789 (FAX)
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com

3. On or about February 10, 2005, SBC and Sage filed a proposed interconnection agreement for approval. On or about February 25, 2005 the Staff filed an Application to Open Case to Review an Interconnection Agreement. On March 1, 2005 the Commission issued its Order Directing Notice and Canceling Prehearing Conference, instructing interested parties to file requests to intervene by March 4, 2005.

4. NuVox seeks to intervene in this proceeding because the Commission's decision could adversely affect NuVox's interests as a provider of telecommunications services in the State. NuVox opposes the proposed interconnection agreement because 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 a minimum the offending portions) should be rejected.

5. NuVox's interests as a telecommunications company is different from those of the general public. Furthermore, NuVox's intervention in this proceeding is in the public interest

because of NuVox's interest in enhancing competition and because of its expertise in the telecommunications industry.

WHEREFORE, NuVox Communications of Missouri, Inc., respectfully requests the Commission to issue its order granting this Request to Intervene.

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

Carl J. Lumley, #32869
Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com

Attorneys for NuVox Communications of Missouri, Inc.,

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

Dana K. Joyce
Missouri Public Service Commission
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

John B. Coffman
Office Of The Public Counsel
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102
opcservice@ded.mo.gov

Nathan Williams
Missouri Public Service Commission
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102
Nathan.Williams@psc.mo.gov

Mark Comley
AT&T Communications of the
Southwest, Inc.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537
comleym@ncrpc.com

Legal Department
Sage Telecom, Inc.
805 Central Expressway
Allen, TX 75013

Charles B. Stewart
Sage Telecom, Inc.
4603 John Garry Drive, Suite 11
Columbia, MO 65203
stewart499@aol.com

Paul Lane
SBC Missouri
One Bell Center, Room 4300
St. Louis, MO 63101
paul.lane@sbc.com

Mary Ann Young
Xspedius Communications
(Kansas City)
2031 Tower Drive
P.O. Box 104595
Jefferson City, MO 65110-4595
myoung0654@aol.com