### 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).	)

## RESPONSE OF NPG CABLE, INC. TO ORDER DIRECTING FILING

COMES NOW, NPG Cable, Inc. d/b/a St. Joseph Cablevision, Inc. ("NPG Cable"), by and through the undersigned counsel, and respectfully submits its response to the Commission's Order Granting Intervention, Resetting Hearing, Adding Parties, and Directing Filing issued in this matter on September 22, 2005. As its Response, NPG Cable states the following:

- 1. NPG Cable is a provider of voice over internet protocol ("VoIP") services in the Savannah exchange.
- 2. NPG Cable provides VoIP services to more than two residential customers in the Savannah exchange.
- 3. NPG Cable does not provide VoIP services to any business customers in the Savannah exchange.
- 4. Attached is the Verification of Bill Severn, the General Manager of NPG Cable, Inc., verifying these facts.
- 5. Having complied with the Commission's Order of September 22, 2005, and having withdrawn its objection in this proceeding, NPG Cable respectfully requests to be excused from the hearing in this case now scheduled for September 28, 2005. NPG Cable's witness is not available on that date, and NPG Cable does not have an interest in participating in the hearing through counsel.

WHEREFORE, NPG Cable respectfully requests that the Commission excuse NPG Cable from appearing at the hearing on September 28, 2005.

Respectfully Submitted,

SPENCER FANE BRITT & BROWNE LLP

Peter Mirakian III MO Bar No. 47841 Michael L. McCann MO Bar No. 41166 Kristine M. Becker MO Bar No. 51702

1000 Walnut Street, Suite 1400 Kansas City, MO 64106-2140 Telephone (816) 474-8100

Facsimile (816) 474-3216

Email: <a href="mailto:pmirakian@spencerfane.com">pmirakian@spencerfane.com</a>
<a href="mailto:pmirakian@spencerfane.com">pmirakian@spencerfane.com

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 Recommendation and Objection of NPG Cable, Inc. d/b/a St. Joseph Cablevision. in Case No. IO-2006-0108 was sent by electronic mail on this 27th day of September, 2005, to the following:

Dana K. Joyce Missouri Public Service Commission P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102 GenCounsel@psc.mo.gov Lewis R. Mills Office Of The Public Counsel P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102 opcservice@ded.mo.gov David Meyer
Missouri Public Service
Commission
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102
David.Meyer@psc.mo.gov

2 WA 824147-1

Linda J. Polodna
ALLTEL Communications,
Inc.
1705 S. Lillian Av
PO Box 180
Bolivar, MO 65613
linda.polodna@alltel.com

Audra Linebaugh Chariton Valley Telecom Corporation 109 Butler Macon, MO 63552 alinebaugh@cvalley.net Mary Tucker CELLCO PARTNERSHIP 112 South Hanley Road St. Louis, MO 63105-3418 mltucker4848@aol.com

Bradley L. Stein
United States Cellular
Corporation
8410 West Bryn Mawr
Avenue
Chicago, IL 60631
bradley.stein@uscellular.com

Larry W. Dority Spectra Communications Group, LLC d/b/a CenturyTel 101 Madison--Suite 400 Jefferson City, MO 65101 lwdority@sprintmail.com Bill Rohde Mark Twain Communications Company Hwy 6 East P.O. Box 128 Hurdland, MO 63547 brohde@marktwain.net

Dan Menser T-Mobile USA, Inc. 12980 SE 38th St. Bellevue, WA 98006-7305 dan.menser@t-mobile.com Kenneth A. Schifman Sprint Spectrum L.P. d/b/a Sprint PCS 6450 Sprint Parkway MS:KSOPHN0212-2A303 Overland Park, KS 66251 kenneth.schifman@mail.sprint.com

Representative Official Cingular Wireless 892 Woods Mill Road Ballwin, MO 63011

Representative Official Nextel West Corporation 2003 Enmund Halley Drive Reston, VA 20191

Pulliam E Thomas
CMT Partners
Cybertel Cellular Telephone Company
Ameritech Cellular
Ameritech Mobile Communications, Inc.
Verizon Wireless
112 South Hanley Road
St. Louis, MO 63105-3418
tepulliam@aol.com

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

3 WA 824147-1

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

No. IO-2006-0108
lo. I

### VERIFICATION

State of Missouri	)	
County of Buchanan		88

I, Bill Severn, first being duly sworn, state on my oath that I am the General Manager of NPG Cable, Inc. I am authorized to act for NPG Cable, Inc. regarding the foregoing Response to Order Directing Filing. I have read the Response and affirm that the statements therein are true and correct to the best of my knowledge, information, and belief.

Bill Severn

Subscribed and sworn to before me this 27th day of September, 2005.

Notary Public

My commission expires:

LORIFLUGRAD, NOTARY PUBLIC BUCHANAN COUNTY, STATE OF MISSOURI MY COMMISSION EXPIRES APRIL 23, 2007

4

WA 824147-1