

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

In the Matter of the Application of Mark       )  
Twain Communications Company for a       )  
Nunc Pro Tunc Order Specifying the Service)  
Area of Mark Twain Communications and    )  
Redefining the Service Area of Spectra     ) Case No. TO-2006-0100  
Communications for Purposes of Mark       )  
Twain's ETC Service Area and Federal       )  
Universal Service Support Pursuant to       )  
Section 254 of the Telecommunications       )  
Act of 1996.                                        )

**STATEMENT OF POSITION**

COMES NOW Intervenor Spectra Communications Group, LLC d/b/a  
CenturyTel ("Spectra"), by and through counsel, and pursuant to 4 CSR 240-2.115(2)(E),  
and respectfully states as follows:

1. On December 5, 2005 Applicant Mark Twain Communications Company  
("Mark Twain"), the Staff of the Missouri Public Service Commission, and the Office of  
the Public Counsel, filed a non-unanimous Stipulation and Agreement in this case.

2. Spectra was not a signatory party to the non-unanimous Stipulation and  
Agreement.

3. However, under the unique circumstances presented in this particular case,  
Spectra does not oppose the Commission issuing an order correcting its June 15, 2000  
Order, issued in Case No. TA-2000-591, to specifically describe Mark Twain's eligible  
telecommunications carrier ("ETC") service area as consisting of the Ewing, LaBelle,  
and Lewistown exchanges.

4. Spectra's primary reason for seeking intervention in this case was the same  
reason Spectra has sought intervention in all of the other ETC cases now pending before

the Commission. Namely, that Spectra believes that the Commission: a) should establish and enforce high standards for ETC designations, with the requirements and public interest tests set forth by the Federal Communications Commission in its March 17, 2005 *ETC Designation Order*<sup>1</sup> being the minimum standards required by sound public policy; and b) whatever standards the Commission ultimately adopts should be fair, competitively neutral, and rigorously and uniformly applied to all ETC applicants.

5. Spectra is not fully convinced that the non-unanimous Stipulation and Agreement goes as far as it might in terms of Mark Twain's commitments to follow the same ETC standards that Spectra is required to follow, specifically with respect to carrier of last resort obligations and with respect to the specific advertising requirements for Life Line programs. Moreover, Mark Twain's insistence that the non-unanimous Stipulation and Agreement contain certain language which Spectra believes to be both somewhat gratuitous, and frankly unnecessary for and irrelevant to, the Commission's disposition of Mark Twain's fundamental request has kept Spectra from becoming a signatory party.

6. However, under the unique circumstances presented in this case Spectra does not believe that on balance an evidentiary hearing is warranted and does not wish to stand in the way of Mark Twain promptly receiving an order from the Commission more clearly specifying its ETC service area.

7. Therefore, pursuant to 4 CSR 240-2.115(2), Spectra does not request an evidentiary hearing in this proceeding and requests that the Commission dispose of this case without the need for the expenditure of further time and resources by the parties.

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<sup>1</sup> *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC Rcd 6371 (2005).

Respectfully submitted,

**/s/ Charles Brent Stewart**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was sent via electronic transmission to counsel for all parties of record this 12<sup>th</sup> day of December, 2005.

**/s/ Charles Brent Stewart**

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