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May 6, 2002

Secretary of the Commission Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102-0360

Via Federal Express 833295903698

Re: Case No. TT-2002-473

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies of NuVox Communications of Missouri, Inc.'s Application to Intervene. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please contact us.

Very July yours,

Carl J. Zamley

CJL:dn Enclosure

cc. SWBT (W/Enclosure)

Public Counsel (W/Enclosure) General Counsel (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Southwestern Bell Telephone)	
Company's Tariff Filing to Extend Business)	Case No. TT-2002-473
Customer Winback Promotions.)	Tariff No. 200200828

NUVOX COMMUNICATIONS OF MISSOURI, INC. 's APPLICATION TO INTERVENE

COMES NOW NuVox Communications of Missouri, Inc. (NuVox), and for its Application 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:

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- 3. On or about March 29, 2002, Southwestern Bell Telephone, L.P. d/b/a Southwestern Bell Telephone Company (SWBT) filed a tariff sheet that would extend certain expiring winback promotions, which tariff had an effective date of April 9, 2002. On April 5, 2002, the Commission issued an order suspending the tariff until May 9, 2002 in order to allow the Commission to further study the tariff. On April 18, 2002, the Commission issued its order further suspending tariff and directing notice and establishing an intervention deadline of May 9, 2002.
- 4. NuVox seeks to intervene in this proceeding because the Commission's decision will affect NuVox's interests as a provider of telecommunications services in competition with SWBT.
- 5. NuVox's interests as a telecommunications company are 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.
- 6. NuVox opposes SWBT's proposed tariff, which includes unlawfully discriminatory winback discounts that would adversely impair competition contrary to the public interest.

WHEREFORE, NuVox Communications of Missouri, Inc., respectfully requests the Commission to issue its order granting NuVox's Application to Intervene.

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P.C. Leland B. Curtis, #20550 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (FAX) clumley@cohgs.com lcurtis@cohgs.com **NuVox Communications** 16090 Swingley Ridge Road, Suite 500 Chesterfield, Missouri 63017 (636) 537-7337 (636) 728-7337 (FAX) ckeith@nuvox.com Attorneys for NuVox Communications of Missouri, Inc. A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 6 day of , 2002, by placing same in the

Certificate of Service

U.S. Mail, postage paid.

Office of Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

Legal Department Southwestern Bell Telephone Company One Bell Center, Room 3520 St. Louis, Missouri 63101-1976

Office of General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102