

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

In the Matter of a Request for Expansion of	)	
the St. Louis Metropolitan Calling Area Plan to	)	
Include the Exchanges of Washington, Union,	)	<b><u>Case No. TO-2005-0141</u></b>
Wright City, St. Clair, Marthasville, Beaufort,	)	
Foley and Warrenton.	)	

**APPLICATION TO INTERVENE  
OF  
CENTURYTEL OF MISSOURI, LLC AND  
SPECTRA COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL**

**COME NOW** CenturyTel of Missouri, LLC (“CenturyTel”) and Spectra Communications Group, LLC d/b/a CenturyTel (“Spectra”) (collectively referred to herein as “Applicants”), pursuant to 4 CSR 240-2.075, and apply to intervene and to become parties herein. In support thereof, Applicants state as follows:

1. CenturyTel is a Louisiana Limited Liability Company authorized to do business in Missouri as evidenced by the certificate of authority issued by the Missouri Secretary of State which was filed in Case No. TM-2002-232 and incorporated herein by reference. On August 30, 2002, CenturyTel purchased the local exchange property of GTE Midwest Incorporated d/b/a Verizon Midwest, pursuant to the Commission's *Report & Order* in Case No. TM-2002-232 issued on May 21, 2002. In Case No. TM-2002-232, the Commission authorized CenturyTel to provide basic local and interexchange telecommunications services in Missouri.

2. Spectra is a Delaware Limited Liability Company authorized to do business in Missouri as evidenced by the certificate of authority issued by the Missouri Secretary of State which was filed in Case No. TM-2000-182 and incorporated herein by

reference. Spectra operates in Missouri using the fictitious name of "CenturyTel," pursuant to the registration of fictitious name filed in Case No. TO-2001-437 and incorporated herein by reference. Spectra provides basic local exchange and intrastate interexchange telecommunications services in Missouri pursuant to certificates of service authority issued by this Commission.

3. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by Section 386.020, RSMo. 2000 and are therefore subject to the jurisdiction and regulation of the Commission as provided by law.

4. All communications, correspondence, pleadings, orders and decisions regarding this proceeding should be directed to:

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5. On November 22, 2004, the Office of the Public Counsel filed a motion, opening Case No. TO-2005-0141, requesting that the Commission expand the St. Louis Metropolitan Calling Area (MCA) Plan to include the exchanges of Washington, Union, Wright City, St. Clair, Marthasville, Beaufort, Foley and Warrenton, as an optional Tier

6. By its Order Consolidating Cases, Denying Motion to Dismiss, Directing Notice, and Setting an Intervention Deadline issued in this matter on March 3, 2005, the Commission

consolidated Case No. TO-2003-0298 with Case No. TO-2005-0141, and designated Case No. TO-2005-0141 as the lead case. The Commission further ordered that any party wishing to intervene in this matter shall file an application to do so no later than March 23, 2005.

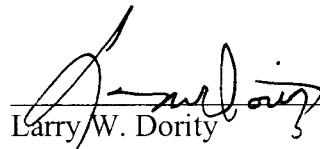
6. CenturyTel presently offers MCA service in portions of the St. Louis MCA Plan, and it provides local exchange telecommunications service in Wright City, Marthasville, Foley and Warrenton. CenturyTel's interest in this proceeding is different from that of the general public and it may be adversely affected by a final order arising from this case. The Commission also has directed notice and set intervention deadlines in other pending cases that address possible expansion of the Springfield and Kansas City MCA Plans. (Case Nos. TO-2005-0142, TO-2005-0143, and TO-2005-0144.) CenturyTel provides local telecommunications service in the Ozark exchange, which is the subject targeted exchange in Case No. TO-2005-0143. Spectra provides local exchange telecommunications service in exchanges adjacent to some of the local exchanges currently included in the Springfield MCA Plan. Whereas the Commission may modify or alter the existing MCA Plans in this and the above-referenced proceedings, Spectra seeks to intervene to monitor this proceeding because the principles and public policies adopted could equally apply to Spectra at a future point in time. As a result, Spectra has an interest in this proceeding that is different from that of the general public and which may be adversely affected by a final order arising from this case. In addition, granting these interventions will be in the public interest because the Applicants will bring to this proceeding their expertise in the areas being investigated and their

experience as telecommunications providers. Finally, no other party to this proceeding will adequately protect the Applicants' interests.

7. In accordance with 4 CSR 240-2.075(2), Applicants are unsure of the position they will take in this proceeding.

WHEREFORE, CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel respectfully request the Commission to grant their Application to Intervene, together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,



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Spectra Communications Group, LLC d/b/a

CenturtyTel

## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 23rd day of March, 2005, to:

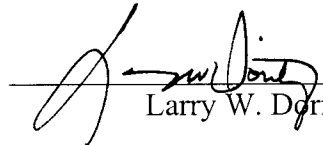
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