

3. Correspondence, communications, orders and decisions in this matter should be addressed to:

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4. The STCG participated in Case No. LA-2004-0133 that addressed Time Warner's application for a Missouri certificate of service authority. The STCG's interests in that case included: (1) the regulatory treatment of voice over internet protocol (VOIP) telecommunications services in Missouri, (2) issues related to the recording and reporting of interexchange traffic; and (3) intercompany compensation.

5. Staff's pleadings in the instant case allege that Time Warner is acting inconsistently with the commitments Time Warner made in its certificate case. Staff also alleges that Time Warner seeks to avail itself of the "benefits" of the Federal Communications Commission's *Vonage* decision without the associated detriments. Staff states, "Time Warner wants the benefits of keeping its basic local certificate without the supposed detriment of tariffing basic local rates."² It is not clear that Time Warner is the same type of entity as Vonage or offers Vonage-type services, and Staff alleges that "Time Warner's services do not have basic characteristics similar to Vonage's."³ Also, if Time

² Staff's Response, filed Nov. 4, 2005, p. 4.

³ *Id.*

Warner is indeed similar to Vonage, then it is unclear why Time Warner is not seeking to abandon or relinquish its Missouri certificate altogether. This matter deserves further examination by the Commission and interested parties.

6. The STCG's expertise and perspectives related to providing telecommunications services in Missouri will aid the Commission in resolving the issues in this case. Consequently, the STCG's intervention and participation will serve the public interest.

7. The STCG has reviewed Time Warner Cable's tariff filing and the subsequent pleadings by Staff, Time Warner Cable, and the MITG. Based on the information available at this time, the STCG opposes Time Warner Cable's tariff filing.

8. The STCG has reviewed the procedural schedule issued by the Commission on November 14, 2005 and will abide by that schedule.

WHEREFORE, the STCG respectfully requests that the Commission issue an Order granting this application to intervene in the above-captioned proceeding.

Respectfully submitted,

/s/ Brian T. McCartney

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 15th day of November, 2005, to the following parties:

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/s/ Brian T. McCartney
Brian T. McCartney

ATTACHMENT A

BPS Telephone Company
Citizens Telephone Company
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Fidelity Telephone Company
Goodman Telephone Company, Inc.
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corp.
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
McDonald County Telephone Company
Mark Twain Rural Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Company
Ozark Telephone Company
Peace Valley Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company