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January 21, 2004

FILED?

JAN 21 2004

Missouri Public
Service Commission

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

Re: Case No. TO-2003-0531
Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced case an original and eight (8) copies of the Position Statement filed on behalf of Spectra Communications Group, LLC, d/b/a CenturyTel and CenturyTel of Missouri, LLC.

A copy of this filing has been sent this date to counsel for all parties of record.

Sincerely,


Brent Stewart

CBS/bt

Enclosure

cc: Counsel for all parties of record
Arthur Martinez

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JAN 21 2004

Missouri Public
Service Commission

In the Matter of the Application of)
Missouri RSA No. 7 Limited Partnership)
d/b/a Mid-Missouri Cellular for)
Designation as a Telecommunications) Case No. TO-2003-0531
Carrier Eligible for Federal Universal)
Service Support Pursuant to Section 254)
of the Telecommunications Act of 1996.)

STATEMENT OF POSITION

COME NOW Spectra Communications Group, LLC d/b/a Century Tel and CenturyTel of Missouri, LLC (collectively "CenturyTel"), by and through counsel, and for their Statement Of Position in the above-captioned cause respectfully state as follows:

1. Mid-Missouri Cellular seeks designation by the Commission as an eligible telecommunications carrier ("ETC"), eligible to receive Federal universal service support. Before designating an additional ETC for an area served by a rural telephone company, the Commission must find that the designation is in the public interest pursuant to Section 214 of the Telecommunications Act and Section 54.201(c) of the FCC's Rules. Is granting ETC status to Mid-Missouri Cellular in the public interest? No, for the reasons set forth on page ten (10) and elsewhere in the Rebuttal Testimony of CenturyTel witness Martinez. On page nine (9) of the Rebuttal Testimony of Mr. Martinez, CenturyTel has proposed a minimum list of public interest factors that the Commission should consider. In addition, Mid-Missouri Cellular's ETC designation, as currently proposed, splits exchanges within the current service areas of Spectra and CenturyTel, and as such, necessarily is improperly seeking to have the incumbent providers' service areas redefined inconsistent with these companies' existing federal disaggregation methodology and targeting of high cost universal support. At

minimum, granting of ETC status to Mid-Missouri Cellular in areas served by rural incumbent carriers should be accompanied by public interest protection conditions imposed by the Commission.

Respectfully submitted,



Charles Brent Stewart, MoBar#34885

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ATTORNEY FOR INTERVENORS
SPECTRA COMMUNICATIONS GROUP,
LLC d/b/a CENTURYTEL and
CENTURYTEL OF MISSOURI, LLC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was sent to counsel for all parties of record in Case No. TO-2003-0531 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or my electronic mail transmission, this 21st day of January, 2004.

