

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>4</sup>  
OCT 03 2002  
Missouri Public  
Service Commission

In the matter of the further Investigation )  
Of the Metropolitan Calling Area )  
Services After the Passage And Implementation )  
Of the Telecommunications Act of 1996 )

Case No. TO-2001-391

**APPLICATION OF CENTURYTEL OF MISSOURI L.L.C. TO INTERVENE**

COMES NOW CenturyTel of Missouri L.L.C. (hereinafter "CenturyTel"), pursuant to 4 CSR 240-2.075, et seq., and applies to intervene and to become a party herein. In support thereof, CenturyTel states:

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. As a result, CenturyTel is a "telecommunications company" and a "public utility" as those terms are defined in § 392.020, RSMo. 2000, and is subject to the jurisdiction, supervision and control of this Commission.

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

James M. Fischer  
Fischer & Dority, P.C.  
101 Madison, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Fax: (573) 636-0383  
Email: [jfischerpc@aol.com](mailto:jfischerpc@aol.com)

Arthur Martinez  
CenturyTel of Missouri  
601 Monroe Street—Suite 304  
Jefferson City, MO 65101  
Telephone: (573) 636-7196  
Email: arthur.martinez@centurytel.com

3. In this proceeding, the Commission is considering modifying the Metropolitan Calling Area Service. As a telecommunications company, CenturyTel may be affected by public policies established in this proceeding. In particular, public policies involving the Metropolitan Area Service and other related issues of importance to the telecommunications industry as a whole are likely to be considered in this proceeding. As a result, CenturyTel has an interest in this proceeding that is different from that of the general public.

4. For the above-stated reasons, CenturyTel's interest in this proceeding is different from that of the general public and cannot be represented by any other party to these proceedings. Actions taken by the Commission in this proceeding may substantially affect CenturyTel's legal interests.

5. CenturyTel's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, CenturyTel's intervention and participation will promote the public interest.

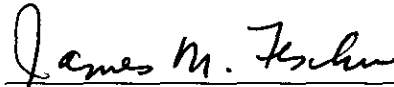
6. CenturyTel will accept the record in this proceeding as it finds it and will participate in the proceeding under the existing procedural schedule. Since there is insufficient information currently available to identify all issues that may arise in this proceeding in the future which will affect CenturyTel's interests, CenturyTel reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

7. Although the intervention date in this proceeding has passed, CenturyTel believes that there is good cause for its late intervention since CenturyTel recently closed its purchase of

the local exchange property previously owned by Verizon Midwest on August 30, 2002, and, as a result, its interests may now be affected by this proceeding.

**WHEREFORE**, CenturyTel of Missouri, L.L.C. respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,



James M. Fischer MBE #27543

Fischer & Dority, P.C.

101 Madison, Suite 400

Jefferson City, MO 65101

Telephone: (573) 636-6758

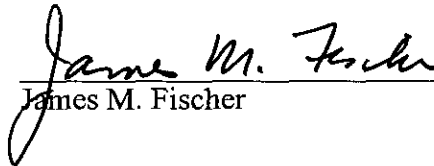
Fax: (573) 636-0383

Email: jfischerpc@aol.com

Attorneys for CenturyTel of Missouri L.L.C.

**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 3rd day of October, 2002.

  
James M. Fischer