

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

In the Matter of the Application of)	
WWC License, LLC, d/b/a CellularOne)	
for Designation as an Eligible)	Case No. TO-2004-0527
Telecommunications Carrier, and)	
Petition For Redefinition of Rural)	
Telephone Company Service Areas.)	

APPLICATION TO INTERVENE

COMES NOW Spectra Communications Group, LLC d/b/a CenturyTel (“Spectra”), pursuant to 4 CSR 240-2.075 and the Commission’s *Order Directing Filing* issued in this case on April 20, 2004, and for its Application To Intervene respectfully states as follows:

1. Spectra is a Delaware Limited Liability Company, and a Commission-regulated “telecommunications 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. Pursuant to the Commission’s *Order Designating Spectra Communications Group, LLC, As Eligible Carrier* in Case No. TA-2000-817, Spectra is designated as a telecommunications carrier eligible to receive federal universal service support. Spectra provides basic local exchange and intrastate interexchange telecommunications services in Missouri pursuant to certificates of service authority issued and tariffs approved by this Commission.

2. All communications, correspondence, pleadings, notices and orders relating to this application should be sent to:

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3. On April 13, 2004, WWC License, LLC, d/b/a CellularOne (a/k/a Western Wireless) (hereinafter “Western Wireless”) filed its Application with the Commission for designation as an eligible telecommunications carrier (“ETC”) for purposes of qualifying to obtain federal universal service support within the specified service areas of certain rural and non-rural incumbent telephone companies in the state of Missouri. Western Wireless’ ETC geographic service area request, as set forth in Attachments 1 and 2 of the Application, includes several Spectra wire centers. In its Application Western Wireless also has petitioned the Commission to redefine the existing ETC service areas of certain rural telephone company service areas, including that of Spectra. Specifically, Western Wireless seeks to redefine Spectra’s existing service area to the nine Spectra wire centers listed in Western Wireless’ Attachment 2 to its Application.

4. Spectra opposes the relief sought by Western Wireless. Spectra meets the federal definition of a rural telephone company in accordance with 47 U.S.C. Section 153(37) of the Telecommunications Act of 1996 (“the Act”). Accordingly, the

Commission must find that designating Western Wireless as an ETC in any portion of Spectra's existing service area meets the public interest criterion set forth in Section 214(e)(2) of the Act. Further, federal law requires at 47 U.S.C. Section 214(e)(5) that, "In the case of an area served by a rural telephone company, 'service area' means such company's 'study area' unless and until the Commission and the States, after taking into account recommendations of the Federal-State Joint Board instituted under section 410(c) of this title, establish a different definition of service area for such company". Spectra's existing ETC "study area" in Missouri is much larger than the nine Spectra wire centers specified in Western Wireless' Application.

5. Accordingly, Spectra has a direct interest in this proceeding which is different from that of the general public and which could be adversely affected by a final order arising out of this case. No other party can adequately represent Spectra's interest in this case and Spectra's experience as an incumbent ETC in portions of Western Wireless' requested ETC service area makes granting Spectra intervention in this proceeding in the public interest.

WHEREFORE, having complied with the requirements of 4 CSR 240-2.075, Spectra Communications Group, LLC, d/b/a CenturyTel respectfully requests that the Commission grant this Application To Intervene in this proceeding.

Respectfully submitted,

/s/ Charles Brent Stewart

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Application To Intervene was sent to counsel for all parties of record in Case No. TO-2004-0527 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 5th day of May, 2004.

/s/ Charles Brent Stewart
