

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

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

**APPLICATION TO INTERVENE  
OF  
SPECTRA COMMUNICATIONS GROUP, LLC dba CENTURYTEL  
AND CENTURYTEL OF MISSOURI, LLC**

**COME NOW** Spectra Communications Group, LLC d/b/a CenturyTel (“Spectra”) and CenturyTel of Missouri, LLC (“CenturyTel”) (collectively referred to herein as “Applicants”), pursuant to 4 CSR 240-2.075 and the Order Directing Notice entered in this matter on June 5, 2003, and apply to intervene and to become parties herein. In support thereof, Applicants state:

1. 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. Pursuant to this 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 by this Commission.

2. 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, and it designated CenturyTel as a telecommunications carrier eligible to receive federal universal service support.

3. All communications, correspondence, and pleadings in regard to this application should be directed to:

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4. On June 2, 2003, Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular ("MMC") filed its application with the Missouri Public Service Commission for

designation as an eligible telecommunications carrier with respect to federal universal service support under Section 254 of the Telecommunications Act of 1996, codified at 47 U.S.C. Section 254, and the implementing regulations of the Federal Communications Commission. In Paragraph 6 of its Application, MMC states that “. . . MMC is required to describe the geographic area in which it requests designation as an ETC. MMC requests designation for its entire FCC-licensed service area in Missouri, subject to the limitations and exclusions described in Paragraph 6.” (Application at 8, footnote omitted).

5. At page 9 of its Application, MMC references an “Appendix E,” which purports to reflect non-rural wire centers for which MMC seeks ETC designation. “Therefore, the Commission may designate MMC as an ETC in all the non-rural wire centers set forth at Appendix E. To the extent MMC serves only a portion of the wire center listed at Appendix E, MMC requests ETC designation in that portion of the wire center where it provides service.” (Footnote 14 states: “Those wire centers that MMC partially serves are indicated on Appendix E with the word ‘partial.’”) Appendix E, page 1 of 2, in part reflects the following listing for “Non-Rural Wire Centers”:

SPECTRUM COMMUNICATIONS GROUP (GTE)

1. Braymer (partial)
2. Concordia
3. Harrisburg (partial)
4. Kingston (partial)
5. Lawson (partial)
6. Prairie Home (partial)
7. Rocheport (partial)
8. Wooldridge (*sic*) (partial)

6. In fact, Spectra meets the federal definition of a rural telephone company in accordance with 47 U.S.C. § 153(37). Thus, the Commission must find that designating MMC as an ETC meets the public interest criterion set forth in § 214(e)(2) of the Act. Further, federal

law requires at 47 U.S.C. § 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 a Federal-State Joint Board instituted under section 410(c) of this title, establish a different definition of service area for such company.”

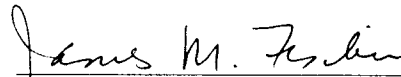
7. Spectra serves the exchanges of Braymer, Concordia, Harrisburg, Kingston and Lawson. CenturyTel serves the exchanges of Prairie Home, Rocheport and Woolridge. In addition, both Applicants take issue with MMC’s description and designation of these wire centers and the resulting statutory and regulatory compliance issues that this Commission must address as a result thereof. As a result, Applicants oppose the relief sought by MMC.

8. For the above-stated reasons, Spectra’s and CenturyTel’s interests in this proceeding are different from that of the general public and cannot be represented by any other party to this proceeding. Actions taken by the Commission in this proceeding may substantially affect Spectra’s and CenturyTel’s legal interests.

9. As MMC states in its Application, “. . . no CMRS carrier has sought designation from the Commission as an Eligible Telecommunications Carrier (“ETC”). For that reason, the instant application represents a case of first impression for the Commission.” Accordingly, Spectra and CenturyTel will be affected by public policies established in this proceeding. Spectra’s and CenturyTel’s participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, Spectra’s and CenturyTel’s intervention and participation will promote the public interest.

**WHEREFORE**, Spectra Communications Group, LLC d/b/a CenturyTel and CenturyTel of Missouri, LLC respectfully request that the Commission issue an order authorizing their intervention in the above-captioned matter.

Respectfully submitted,



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CenturyTel and

CenturyTel of Missouri, LLC

## 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 18th day of June, 2003, to:

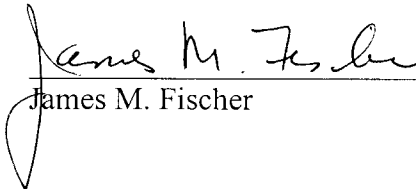
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