

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

In the Matter of the Application of	)	
NuVox Communications of Missouri, Inc.	)	
For an Investigation into the Wire Centers	)	<b><u>Case No. TO-2006-0360</u></b>
That AT&T Missouri Asserts are	)	
Non-Impaired Under the TRRO	)	

**MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.'S**  
**APPLICATION TO INTERVENE**

COMES NOW McLeodUSA Telecommunications Services, Inc. (McLeodUSA), by and through counsel, pursuant to 4 CSR 240-2.075, and respectfully applies for intervention as a party in this case. In support of this application to intervene, McLeodUSA states as follows:

1. McLeodUSA is a competitive telecommunications company duly incorporated and existing under and by virtue of the laws of the state of Iowa, and is an authorized provider of basic local (CLEC) and local exchange (LE) telecommunications services in Missouri pursuant to certificate of service authority granted by the Commission in Case No. TA-98-288. McLeodUSA is also an authorized provider of intrastate interexchange (IXC) telecommunications services in Missouri.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Mary Ann (Garr) Young  
WILLIAM D. STEINMEIER, P.C.  
2031 Tower Drive, P.O. Box 104595  
Jefferson City, MO 65110-4595  
Phone: 573-634-8109  
Facsimile: 573-634-8224  
Email: myoung0654@aol.com

3. On March 17, 2006, an Application for an Investigation into the Wire Centers that AT&T Missouri Asserts are Non-Impaired Under the TRRO was filed with the Commission by NuVox Communications of Missouri, Inc., (NuVox) and docketed as case No. TO-2006-0360. McLeodUSA seeks intervention in this matter, as the Commission's decision will directly and significantly affect it. McLeodUSA's position in this matter will be in support of the Application. McLeodUSA also supports NuVox's motion for issuance of a protective order in this case.

3. McLeodUSA's interests are different from those of the general public. McLeodUSA's expertise as a competitive telecommunications provider will be of benefit to the Commission and its intervention is in the public interest.

WHEREFORE, McLeodUSA respectfully requests that the Commission grant this Application to Intervene and make McLeodUSA a party to this proceeding for all purposes.

Respectfully submitted,

/s/ Mary Ann Young

Mary Ann (Garr) Young, MoBar #27951

WILLIAM D. STEINMEIER, P.C.

2031 Tower Drive

P.O. Box 104595

Jefferson City, MO 65110-4595

Phone: 573-634-8109

Fax: 573-634-8224

Email: myoung0654@aol.com

COUNSEL FOR MCLEODUSA  
TELECOMMUNICATIONS SERVICES, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on the following this 17<sup>th</sup> day of March 2006:

Office of the Public Counsel, opcservice@ded.mo.gov

Office of the General Counsel, gencounsel@psc.mo.gov

NuVox Communications of Missouri, Inc., clumley@lawfirmemail.com

AT&T Missouri, paul.lane@sbc.com

/s/ Mary Ann Young

Mary Ann (Garr) Young