

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Application of )  
NuVox Communications of Missouri, Inc. for )  
an Investigation into the Wire Centers that ) Case No. TO-2006-0360  
AT&T Missouri Asserts are Non-Impaired )  
Under the TRRO )

**MCI WORLDCOM COMMUNICATIONS SERVICES, INC.**  
**d/b/a VERIZON BUSINESS SERVICES**  
**APPLICATION TO INTERVENE**

COMES NOW MCI WorldCom Communications Services, Inc. d/b/a Verizon Business Services ("Verizon") pursuant to 4 CSR 240-2.075 and for its Application to Intervene states to the Commission:

1. MCI Communications Services, Inc. (MCI) is a Delaware corporation in good standing duly authorized to conduct business in Missouri with regulatory offices at 600 Hidden Ridge, HQE02H45, P.O. Box 152092, Irving, Texas 75015-2415. MCI is authorized to do business in Missouri and its fictitious name, Verizon Business Services, is duly registered with the Missouri Secretary of State.<sup>1</sup> Verizon is authorized as a competitive local exchange carrier under certificate granted and tariffs approved by the Commission.

2. All communications and pleadings in this case should be directed to:

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<sup>1</sup> MCI filed a copy of the registration of the fictitious name "Verizon Business Services" with the Commission on December 23, 2005. See, In the Matter of the name Change of MCI Communications Services to Verizon Business Services, Case No. XN-2006-0275

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3. On or about March 17, 2006, NuVox Communications of Missouri, Inc. ("NuVox") filed its Application for an Investigation into the Wire Centers that AT&T Missouri Asserts are Non-Impaired Under the TRRO, which was assigned Case No. TO-2006-0360.

4. Verizon seeks to intervene in this proceeding because the Commission's decision will affect Verizon's interests as a provider of telecommunications services and a CLEC.

5. Verizon's interests as a telecommunications company are different from those of the general public. Furthermore, Verizon's intervention in this proceeding is in the public interest because of Verizon's expertise in the telecommunications industry.

6. Verizon neither supports nor opposes the Application at this time, as Verizon is currently unsure of its position.

7. Verizon further hereby withdraws its Request for Intervention filed on July 13, 2006.

8. Verizon acknowledges that this Application was not filed by the deadline established by the Commission. Verizon asserts there is good cause to grant this Application, in that Verizon will contribute its expertise to this proceeding and no party will be adversely affected by the Commission allowing it to intervene at this early state of the proceedings.

WHEREFORE, MCI Communications Services, Inc. d/b/a Verizon Business Services, respectfully requests the Commission issue its order granting Verizon's Application to Intervene.

Respectfully submitted,

CURTIS, HEINZ,  
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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Attorneys for MCI WorldCom Communications Services, Inc.  
d/b/a Verizon Business Services.

**CERTIFICATE OF SERVICE**

A true and correct copy of the forgoing was e-mailed, faxed or mailed this 14th day of July, 2006, to the persons listed on the attached service list.

/s/ Carl J. Lumley

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