

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

In the Matter of the Application of)	
Chariton Valley Telecom Corporation)	
for Designation as a Telecommunications)	
Company Carrier Eligible for Federal)	Case No. TO-2005-0423
Universal Service Support pursuant to)	
Section 254 of the Telecommunications)	
Act of 1996.)	

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 May 20, 2005 *Order
Directing Notice and Establishing Date For Intervention*, and for their Application To
Intervene respectfully state as follows:

1. Spectra is a Delaware Limited Liability Company, and a Commission-regulated incumbent local exchange 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:

Charles Brent Stewart
STEWART & KEEVIL, L.L.C.
4603 John Garry Drive, Suite 11
Columbia, Missouri 65203
(573) 499-0635
(573) 499-0638 (fax)
Stewart499@aol.com

Arthur P. Martinez
CenturyTel
220 Madison Street
Jefferson City, Missouri 65101
(573) 634-8424
(573) 636-6826 (fax)

Cal Simshaw
CenturyTel
805 Broadway
Vancouver, Washington 98660
(360) 905-5958
(360) 905-5953 (fax)

3. On May 17, 2005, Chariton Valley Telecom Corporation (“Chariton Valley”) filed an Application with the Commission for designation as an eligible telecommunications carrier (“ETC”) for purposes of qualifying to obtain federal universal service support within the Macon, Missouri exchange. Spectra is the incumbent local exchange telecommunications carrier and carrier of last resort serving the Macon, Missouri exchange.

4. Based on the paucity of information provided by Chariton Valley in its Application, Spectra opposes the relief sought by Chariton Valley at this time and agrees with the Office of the Public Counsel that an evidentiary hearing should be required in this case. Spectra should be granted intervention in this proceeding because, as noted above, Spectra is the incumbent local exchange carrier and carrier of last resort for the Macon, Missouri exchange and currently is designated as an ETC carrier for that exchange.

5. Moreover, 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 Chariton Valley 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 one Macon, Missouri exchange specified in Chariton Valley’s Application.

6. 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 interests in this case. Spectra’s experience as the incumbent provider in the Macon, Missouri exchange makes granting Spectra’s 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

Charles Brent Stewart, MoBar#34885
STEWART & KEEVIL, L.L.C.
4603 John Garry Drive, Suite 11
Columbia, Missouri 65203
(573) 499-0635
(573) 499-0638 (fax)
Stewart499@aol.com

ATTORNEY FOR SPECTRA
COMMUNICATIONS GROUP, LLC
d/b/a CENTURYTEL

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-2005-0423 by depositing same in the U.S. Mail, first class postage prepaid, by hand-delivery, or by electronic mail transmission, this 9th day of June, 2005.

/s/ Charles Brent Stewart
