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March 6, 2003

FILED³

MAR 06 2003

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P. O. Box 360
Jefferson City, MO 65102-0360

Missouri Public
Service Commission

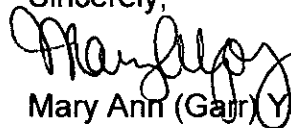
RE: Case No. IO-2003-0281
The Investigation of the State of Competition in the Exchanges
of Sprint Missouri, Inc.

Dear Secretary:

Enclosed please find an original and eight copies of Application to Intervene of National ALEC Association/Prepaid Communications Association for filing with the Commission in the above-referenced case.

Thank you for your assistance in processing this filing. Copies are being served on the Commission's General Counsel, the Public Counsel and Sprint Missouri, Inc.. Please contact me at 634-8109 if there are any questions.

Sincerely,



Mary Ann (Garr) Young

Enclosure

cc: General Counsel
Office of Public Counsel
Sprint Missouri, Inc.
Glenn Richards/Susan Hafeli

MAR 06 2003

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

Missouri Public
Service Commission

In the Matter of the Investigation of the)
State of Competition in the Exchanges)
of Sprint Missouri, Inc.)

Case No. IO-2003-0281

**APPLICATION TO INTERVENE OF NATIONAL ALEC
ASSOCIATION/PREPAID COMMUNICATIONS ASSOCIATION**

COMES NOW National ALEC Association/Prepaid Communications Association (NALA/PCA) by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, NALA/PCA states as follows:

1. NALA/PCA is a national organization of pre-paid local service providers, whose members include several Missouri-certificated CLECs, some of which are authorized to provide service in Sprint Missouri, Inc. (Sprint) exchanges or have interconnection agreements with Sprint. The following NALA/PCA members have basic local telecommunications service certificates issued by the Missouri Public Service Commission: 1-800-Reconex, Inc.; CAT Communications International, Inc.; DPI Teleconnect, LLC; EZ Talk Communications, LLC; Local Line America, Inc.; Metro Teleconnect Companies, Inc.; and NOW Communications, Inc. In fact NALA/PCA includes almost 10 percent (7 of 75) of the CLECs listed on Sprint Missouri, Inc.'s Appendix A to Sprint's Motion for Joinder of Parties filed in this case on February 11, 2002.

2. NALA/PCA's principal place of business address is: 2300 N. Street NW, Washington DC 20037.

3. Pursuant to 4 CSR 240-2.075(3), regarding intervention by associations, a copy of NALA/PCA's most recent membership directory, listing all of its members, is provided as Exhibit 1.

4. All communications and pleadings in this case should be served on:

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5. Members of NALA/PCA are authorized to provide competitive local exchange telecommunications service in Missouri. Therefore, NALA/PCA has a direct and substantial interest in the outcome of the Commission's investigation into whether effective competition exists in Sprint's exchanges.

6. NALA/PCA members have direct experience in dealing with Sprint, and believes that their participation in this case will be highly informative to the Commission as regards the status of competition in Sprint exchanges. The experience and interest of NALA/PCA members in attempting to develop competitive basic local service in Sprint exchanges demonstrates NALA/PCA's substantial interest in participating in the Commission's review of the state of competition in Sprint exchanges.

7. NALA/PCA's intervention would serve the public interest because its contribution to the record in this proceeding would help to ensure that the Commission has relevant information concerning the level of competition in Sprint's service area.

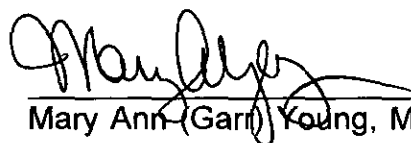
8. As authorized providers of competitive telecommunications services in Missouri, and as current and prospective providers of such services in Sprint's exchanges, NALA/PCA's interest in the Commission's decision in this case is substantially different from that of the general public.

9. The outcome of this proceeding will have a significant effect on NALA/PCA's members' ability to compete in the provision of basic local telecommunications services in Missouri.

10. Pursuant to 4 CSR 240-2.075(2), NALA/PCA states that it currently opposes the Commission finding that effective competition exists in Sprint exchanges in Missouri.

WHEREFORE, NALA/PCA respectfully requests the Missouri Public Service Commission approve this Application to Intervene.

Respectfully submitted,



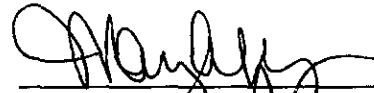
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Counsel for National ALEC
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed, postage prepaid, this 6th day of March 2003, on the Office of Public Counsel and the Commission's General Counsel, and counsel for Sprint Missouri, Inc.



Mary Ann (Garr) Young

Exhibit 1



NATIONAL
ALEC ASSOCIATION



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