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May 31, 2002

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Davel Communications, Inc. and PhoneTel Technologies, Inc.
Case No. PM-2002-1089

Dear Judge Roberts:

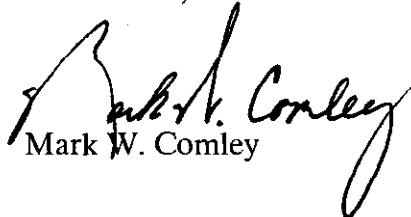
Enclosed for filing please find the original and eight copies of a Motion for Reconsideration of Order Directing Filing.

Please contact me if there are any questions concerning this filing. Thank you very much for your attention.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:kjh
Enclosure

cc: Office of Public Counsel
General Counsel's Office
Paul W. Tripp
Lin Harvey

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

Application of Davel Communications, Inc.)
and PhoneTel Technologies, Inc. and)
their respective Subsidiaries for Approval)
of Merger and Transfer of Control)

Case No. PM-2002-1089

**MOTION FOR RECONSIDERATION OF
ORDER DIRECTING FILING**

COME NOW Davel Communications, Inc. ("Davel") and PhoneTel Technologies, Inc. ("PhoneTel") (collectively the "Applicants") and respectfully request the Commission to reconsider its Order Directing Filing issued on May 30, 2002. In support thereof, Applicants submit the following:

1. PhoneTel is a certificated payphone service provider in the State of Missouri and was certificated under the provisions of Sections 392.440 and 392.520, RSMo 2000. Under Section 392.520, PhoneTel's services are subject to the minimum regulation permitted for competitive telecommunications companies and hence, PhoneTel constitutes a competitive telecommunications provider under the rules and regulations of the Commission. Although Davel is not itself certificated by this Commission, its operating subsidiary, Telaleasing Enterprises, [Inc.](#) is certified as a payphone service provider.

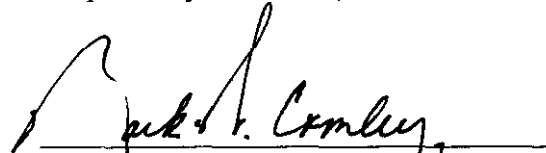
2. Under 4 CSR 240-2.060 (3), competitive telecommunications companies are exempt from the filing requirements of 4 CSR 240-2.060 (8)(A)-(E) and the material identified in the Commission's Order Directing Filing was not attached to the Application in this case on the strength of that exemption. If the Commission has determined that the exemption does not apply in this case for some reason, Applicants would then request that those filing requirements be waived for this

Application. Both Applicants and their certificated payphone affiliates are subjected already to the least regulation under the law, and the waiver would be consistent with the Commission's rules for competitive telecommunications companies generally.

3. The nature of the transaction submitted to the Commission is not complex from a regulatory perspective. Applicants renew their offer to submit copies of the Merger Agreement and any other information upon Staff's request as needed. In this way, the copying and related expenses of producing all of the material at once can be avoided, and furthermore this will eliminate considerable bulk in the Commission's files and archives.

WHEREFORE, Applicants respectfully request the Commission to reconsider its Order Directing Filing and exempt Applicants from the filing requirements of 4 CSR 240-2.060 (8)(A)-(E), and if not exempted, then Applicants request that those filing requirements be waived.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark W. Comley", is written over a horizontal line.

Mark W. Comley #28847
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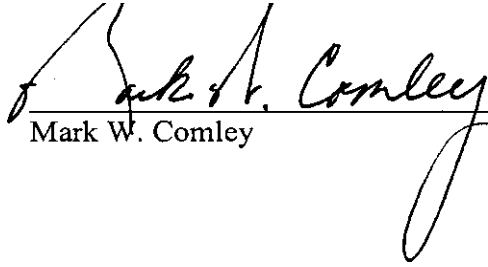
Attorneys for DAVEL COMMUNICATIONS, INC.
AND PHONETEL TECHNOLOGIES, INC.

Certificate of Service

I hereby certify that on this 31st day of May, 2002, a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102-7800 Jefferson City

Office of the Commission General Counsel
P.O. Box 360
MO 65102



Mark W. Comley