

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
CHARLES E. SMARR

312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 635-0427

DEAN L. COOPER
MARK G. ANDERSON
GREGORY C. MITCHELL
BRIAN T. MCCARTNEY
BRIAN K. BOGARD
DIANA C. FARR
JANET E. WHEELER

OF COUNSEL
RICHARD T. CIOTTONE

June 24, 2002

Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Re: Case No. CO-2002-1078

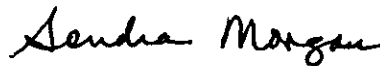
Dear Mr. Roberts:

Enclosed for filing in above-referenced matter, please find the following documents:

1. Application to Intervene; and
2. The Small Telephone Company Group's Suggestions in Opposition to the Office of Public Counsel's Motion to Establish Case and To Conduct an Investigation.

Please see that these filings are brought to the attention of the appropriate Commission personnel. If you have any questions regarding this matter, please direct them to me at the above number. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,



Sondra B. Morgan

SBM/da
Enclosures
cc: Parties of Record

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

In the Matter of the Investigation of the	)	
Status of Prepaid Local Service Providers	)	
as Alternative Local Exchange Competitors	)	Case No. CO-2002-1078
Under Section 392.245, RSMo.	)	

APPLICATION TO INTERVENE

Comes now the Small Telephone Company Group, which companies are set out in Attachment A, (hereinafter referred to as "Applicants") and in support of its Application to Intervene in the above-captioned matter pursuant to 4 CSR 240-2.075 states that:

1. Applicants currently provide telecommunications services to members of the public located in those areas certificated to them by the Missouri Public Service Commission ("Commission"). As is relevant to this case, Applicants provide "basic local telecommunications services" within the exchanges as defined by their respective tariffs which are on file with and approved by the Commission. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020, RSMo 2000, and are, therefore, subject to the jurisdiction, regulation and control of the Commission as provided by law. Applicants are "small local exchange companies" as defined in § 386.020(30), RSMo 2000, and also are rural telephone companies and incumbent local exchange carriers as defined by the Federal Telecommunications Act of 1996 (the "Act").

2. All correspondence, communications, orders and decisions in this matter should be addressed to the following:

W. R. England, III
Sondra B. Morgan
Brydon, Swearingen & England P.C.
P.O. Box 456
Jefferson City, Missouri 65102
(573) 635-7166
(573) 635-0427 (fax)
smorgan@brydonlaw.com (e-mail)

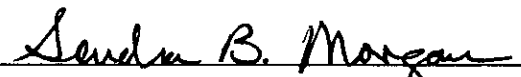
3. On May 16, 2002, the Office of Public Counsel ("Public Counsel") filed a Motion to Establish Case and to Conduct an Investigation ("Motion") requesting that the Commission conduct an investigation into the status of prepaid local service providers as that status relates to the existence of alternative local exchange competitors offering basic local service in exchanges of incumbent local exchange companies seeking to be regulated by price cap regulation pursuant to § 392.245, RSMo 2000. On June 3, 2002, the Commission issued its Notice of Motion and Order Directing Response in which it directed the Data Center to send notice and directed interested parties to file a request for intervention no later than June 24, 2002.

4. Applicants file this Application to Intervene in the instant proceeding on the grounds that any investigation into the status of prepaid local service providers serving as competitors sufficient for local exchange companies to qualify for price cap regulation under § 392.245, RSMo may affect the small companies. Applicants thus have an interest in this proceeding that is different from that of the general public. In addition, Applicants' expertise in and perspective on the provision of telecommunications services in this State will aid the Commission in resolving the issues related to this proceeding. Consequently, their intervention and participation will serve the public interest. Applicants oppose the establishment of a case as requested by Public Counsel

as they believe that prepaid providers certificated to provide basic local telecommunications service by the Commission are alternative local exchange companies under § 392.245, RSMo.

WHEREFORE, the Small Telephone Company Group respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned proceedings and for such other orders as are reasonable in the circumstances.

Respectfully submitted,


W. R. England, III MoBar #23975
Sondra B. Morgan MoBar #35482
BRYDON, SWEARENGEN & ENGLAND P.C.
P.O. Box 456
Jefferson City, Missouri 65102
(573) 635-7166
(573) 635-0427
smorgan@brydonlaw.com (e-mail)

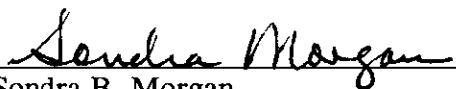
Attorneys for
The Small Telephone Company Group

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered or mailed, United States Mail, postage prepaid, this 24th day of June, 2002, to:

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

Dan Joyce
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102



Sondra B. Morgan

SMALL TELEPHONE COMPANY GROUP

BPS Telephone Company,
Cass County Telephone Company,
Citizens Telephone Company of Higginsville, Missouri, Inc.,
Craw-Kan Telephone Cooperative, Inc.,
Ellington Telephone Company,
Goodman Telephone Company, Inc.,
Granby Telephone Company,
Grand River Mutual Telephone Corporation,
Green Hills Telephone Corporation,
Holway Telephone Company,
Iamo Telephone Company,
KLM Telephone Company,
Kingdom Telephone Company,
Lathrop Telephone Company,
Le-Ru Telephone Company,
Mark Twain Rural Telephone Company,
McDonald County Telephone Company,
Miller Telephone Company,
New Florence Telephone Company,
New London Telephone Company,
Orchard Farm Telephone Company,
Oregon Farmers Mutual Telephone Company,
Ozark Telephone Company,
Peace Valley Telephone Company,
Rock Port Telephone Company,
Seneca Telephone Company,
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company