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June 20, 2002

VIA FEDERAL EXPRESS

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

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

Dear Mr. Roberts,

Enclosed for filing with the Commission in the above-referenced case is an original and eight (8) copies of Fidelity Telephone Company's Application To Intervene.

Please stamp "Filed" on the extra copy and return it to me in the enclosed self-addressed envelope.

Thank you for your assistance.

Yours very truly,

GREENSFELDER, HEMKER & GALE, P.C.

By

Sheldon K. Stock

SKS/kka
Enclosures
545863.1

cc: Office of the Public Counsel
Office of the General Counsel
Mr. John T. Davis
Mr. Dave Beier

**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)
Under Section 392.245, RSMo)

Case No. CO-2002-1078

**FIDELITY TELEPHONE COMPANY'S
APPLICATION TO INTERVENE**

COMES NOW Fidelity Telephone Company ("Fidelity") and, pursuant to §386.420 RSMo (1998) and 4 CSR 240-2.075, respectfully requests that the Missouri Public Service Commission ("Commission") grant it the right to intervene in the above-captioned proceeding. In support of this Application, Fidelity states as follows:

1. On May 16, 2002, the Office of Public Counsel filed a motion requesting that the Commission establish a case to investigate whether prepaid local service providers are actually offering basic local service in any exchange of an incumbent local exchange company's territory under Section 392.245, RSMo.
2. On June 3, 2002, the Commission issued its Notice of Motion and Order Directing Response in this proceeding, in which interested parties were given until June 24, 2002, to file an application to intervene and/or a response to the motion of the Office of Public Counsel.

IDENTITY OF APPLICANT

3. Fidelity is a corporation organized and existing under the laws of the state of Missouri, with its principal place of business located at 64 North Clark, Sullivan, Missouri 63080. Fidelity is an "incumbent local exchange telecommunications company," "interexchange telecommunications company," "small local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State

of Missouri as each of those phrases are defined in §386.020 RSMo (2000). In addition, Fidelity is a "rural telephone company," as defined in 47 U.S.C. § 153(37).

4. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

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10 South Broadway, Suite 2000
St. Louis, Missouri 63102-1774
jlr@greensfelder.com

John T. Davis
Fidelity Telephone Company
64 North Clark
Sullivan, Missouri 63080

5. Fidelity is certified to provide basic local exchange telecommunication services and interexchange telecommunication services in a specific geographic area in Missouri.

APPLICANT'S INTEREST AND POSITION IN PROCEEDING

6. Fidelity seeks to intervene in this proceeding, because it has a direct and pecuniary interest in the Commission's decision on whether prepaid local service constitutes basic local service such that a small incumbent local exchange telecommunications company may elect price cap status under Section 392.245, RSMo if an alternative local exchange telecommunications company has been certified to provide prepaid local service and is providing such service in any part of the small incumbent company's service area.

7. Fidelity's interests as a local exchange and interexchange telecommunications service provider differ from those of the general public. No other party to this proceeding will adequately protect Fidelity's interests.

8. Granting of this intervention will be in the public interest because Fidelity will bring to this proceeding its expertise and experience as a telecommunications provider, and will aid the Commission in resolving the issues raised herein.

9. Because there is insufficient information currently available, Fidelity is uncertain, at this time, of the position it will take in this proceeding, and reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, Fidelity Telephone Company respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By: 

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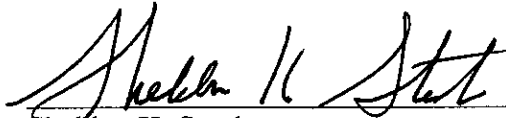
Attorneys for
Fidelity Telephone Company

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 20th day of June, 2002 to:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Office of the General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102


Sheldon K. Stock