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June 24, 2002

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

FILED⁴

JUN 24 2002

RE: Case No. CO-2002-1078

Missouri Public
Service Commission

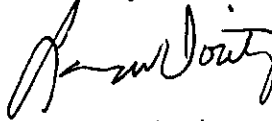
Dear Mr. Roberts:

Please find enclosed for filing with the Commission in the above-referenced case, the original and eight (8) copies each of the following pleadings filed on behalf of ALLTEL Missouri, Inc.:

- 1) Application To Intervene; and
- 2) ALLTEL Missouri, Inc.'s Suggestions In Opposition To The Office Of The Public Counsel's Motion To Establish A Case And To Conduct An Investigation.

Copies of the foregoing pleadings have been hand-delivered or mailed this date to counsel of record. Thank you for your attention to this matter.

Sincerely,



Larry W. DORITY

Enclosures

cc: Dana K. Joyce, General Counsel
Michael Dandino, Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED⁴
JUN 24 2002
Missouri Public
Service Commission

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

APPLICATION TO INTERVENE

COMES NOW ALLTEL Missouri, Inc. (ALLTEL), pursuant to 4 CSR 240-2.075 and the Commission's Notice of Motion and Order Directing Response issued on June 3, 2002, and for its Application To Intervene respectfully states as follows:

1. ALLTEL currently provides telecommunications services to members of the public located in those areas certificated to it by the Commission. ALLTEL provides "basic local telecommunications services" within the exchanges as defined by its respective tariffs which are on file with and approved by the Commission. ALLTEL is a "telecommunications company" and "public utility" as those terms are defined by Section 386.020, RSMo 2000, and is, therefore, subject to the jurisdiction, regulation and control of the Commission as provided by law. In addition, ALLTEL is a "small local exchange telecommunications company" as defined in Section 386.020(30), serving less than one hundred thousand (100,000) access lines in Missouri.

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

Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
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3. On May 16, 2002, the Office of the Public Counsel ("Public Counsel") filed a Motion To Establish Case And To Conduct An Investigation ("Motion"), wherein it requests "the Commission to open a case to investigate and determine if the presence of an alternative local exchange telecommunications company providing prepaid local service is sufficient to satisfy the requirements of the price cap statute."

4. On June 3, 2002, the Commission issued its Notice Of Motion And Order Directing Response ("Order"), directing its Data Center to send notice and directing interested parties to file a request for intervention no later than June 24, 2002. The Commission's Order describes the relief sought in Public Counsel's Motion as "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."

5. ALLTEL files this Application to Intervene in the instant proceeding on the grounds that any such investigation will directly affect ALLTEL's interests as a provider of telecommunications services in Missouri. ALLTEL previously filed its Notice of Election To Be Price Cap Regulated Under Section 392.245, RSMo 2000 with the Commission on May 17, 2002. ALLTEL thus has an interest in this proceeding that is different from that of the general public. In addition, ALLTEL's 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, ALLTEL's intervention and participation will serve the public interest.

6. ALLTEL opposes the relief sought in Public Counsel's Motion. Concurrent with this filing and pursuant to the Commission's Order, ALLTEL is submitting its response in opposition to the Public Counsel's Motion.

WHEREFORE, ALLTEL Missouri, Inc. respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned proceeding and for such other orders as are reasonable in the circumstances.

Respectfully submitted,



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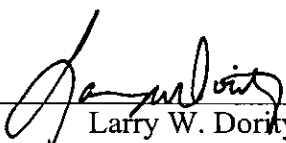
Attorneys for ALLTEL Missouri, Inc.

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 the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Dana K. Joyce, General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102



Larry W. Dority