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April 4, 2003

FILED³

APR 04 2003

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, MO 65102-0360

RE: IO-2003-0281

The Investigation of the State of Competition in the Exchanges of Sprint
Missouri, Inc.

Dear Mr. Roberts:

Enclosed please find an original and five copies of NALA/PCA'S REPLY TO NOW COMMUNICATION, INC.'S RESPONSE TO SPRINT'S MOTION FOR JOINDER OF PARTIES for filing with the Commission in the above-referenced case.

Thank you for assistance in processing this filing. Copies are being served on all parties of record, including the Commission's General Counsel and Office of the Public Counsel. Please contact me at 634-8109 if there are any questions.

Sincerely,



Mary Ann (Garr) Young

Enclosure

cc: General Counsel
Office of the Public Counsel
Parties of Record
Mr. Glenn Richards
Ms. Susan Hafeli

FILED³

APR 04 2003

Missouri Public
Service Commission

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

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

IO-2003-0281

NALA/PCA'S REPLY TO NOW COMMUNICATION, INC.'S
RESPONSE TO SPRINT'S MOTION
FOR JOINDER OF PARTIES

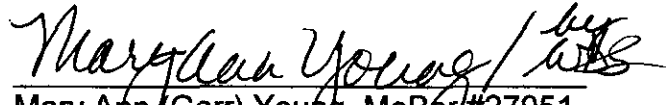
Comes Now National ALEC Association/Prepaid Communications Association ("NALA/PCA") by and through counsel and pursuant to 4 CSR 240-2.080 (15), and files this Reply to the Response of NOW Communications, Inc., filed on or about April 2, 2003, to Sprint's Motion for Joinder of Parties in this case of March 17, 2003. NALA/PCA continues to strongly oppose Sprint's Motion for Joinder of Parties and in support of its position states as follows:

1. NALA/PCA observes with interest the recitation by NOW Communications, Inc. that: "As NOW is no longer a member of NALA/PCA, Sprint does not object to removing NOW from the Motion for Joinder." This is further, clear evidence that Sprint's real interest in "joining" the Missouri members of NALA/PCA as individual parties to this docket is to seek retribution for NALA's intervention and to increase their costs, as suggested in the Response filed by NALA/PCA on March 28 in this matter.

2. Sprint is apparently willing to excuse NOW Communications, one of the few carriers actually doing some business in Sprint territory in Missouri, but continues to seek joinder of the company-members of NALA/PCA, most of whom do no business in Sprint territory at the present time. This further demonstrates that there is no independent, objective reason for joinder of these particular companies as individual parties.
3. The fundamental fact is that neither NOW Communications, nor the Missouri member-companies of NALA/PCA, should be joined as individual parties to this proceeding, nor has Sprint offered any reason why they should be.
4. The Commission should conclude, as NALA/PCA has previously stated, that absolutely no justification or authority has been provided by Sprint in support of its request to forcibly join additional CLECs as individual parties to this case merely by virtue of their membership in an association which has intervened as an association, namely NALA/PCA.

WHEREFORE, NALA/PCA respectfully requests that the Commission deny Sprint's Motion for Joinder of Parties in this case.

Respectfully submitted,


Mary Ann (Garr) Young, MoBar #27951

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Counsel for National ALEC
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Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed, postage prepaid, this 4th day of April 2003, to each party shown in the Service List attached hereto.


Mary Ann (Garr) Young

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