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June 10, 2002

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

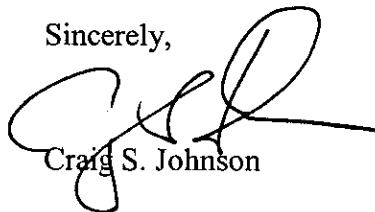
Re: Case No. CO-2002-1078

Dear Secretary Roberts:

Enclosed please find for filing an original and eight copies of the Application of MITG Companies to Intervene. A copy of this letter and a copy of the enclosed application, has been served upon all Counsel of Record, specifically including the Staff Counsel and the Office of the Public Counsel.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ/mo

Enc.

cc: Danial Joyce (General Counsel)
Michael Dandino (Office of Public Counsel)
Sondra Morgan
MITG Managers

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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) **Case No. CO-2002-1078**
Competitors Under Section 392.245, RSMo.)

APPLICATION OF MITG TO INTERVENE

COMES NOW the Missouri Independent Telephone Company Group (MITG), consisting of Alma Telephone Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company, Modern Telecommunications Company, Mo-Kan Dial Inc., and Northeast Missouri Rural Telephone Company, pursuant to 4 CSR 240-2.0075 and the Commission's June 3, 2002 Notice of Motion and Order Directing Response, and sets forth this application to intervene:

1. Applicants are all small rural incumbent local exchange telecommunications companies regulated by this commission, and who are small incumbent local exchange companies for purposes of 392.245 RSMo. regarding the eligibility of a small incumbent local exchange company to become eligible for price cap regulation as opposed to rate of return regulation.
2. Some members of the MITG, Mid-Missouri Telephone Company and Chariton V Valley Telephone Corp., currently have approved interconnection or resale agreements with pre-paid service provider, Missouri State Discount Telephone, in effect.
3. Applicants MITG are subject to the same statutes and rules as is BPS Telephone Company. In TC-2002-1078, Staff has challenged BPSs' eligibility for price cap regulation on the basis of MSDT's providing service in BPSs' service area. The MITG group's interest is MITGmo-ltr

similar to that of BPS and is different from that of the general public in that any precedent established in this case could have some effect upon the MITG companies. It is in the public interest for this question to initially be determined by the Commission with complete participation of small ILECs such as the MITG.

4. The MITG believes that the provisions of 392.245 RSMo. as interpreted by this Commission in prior precedent, are plain and unambiguous and allow a small incumbent local exchange company to elect price cap regulation by notification when a pre-pad service provider such as MSDT has been certificated to provide basic local exchange service, and is providing such service in that incumbents' service area.

5. The MITG disagrees with OPC's assertions set forth in its motion to establish this case, disagrees that the provision of service by prepaid local service providers such as MSDT does not constitute the provision of basic local service, and disagrees with OPC's suggestion that provision of such service in a small ILEC's service area does not entitle that ILEC to elect price cap regulation. Therefore, the MITG opposes the motion of OPC which is basis for this docket.


6. Granting of this proposed intervention is in the public interest in that it assures the Commission it will hear from all interested or potentially interested parties with respect to the eligibility to elect price cap status on the basis of pre-paid service providers such as MSDT.

7. Correspondence, communications, pleadings, motions, orders, and decisions should be sent to the MITG by serving them upon the undersigned counsel of record for applicants MITG companies:

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WHEREFORE, on the basis of the foregoing, the MITG companies respectfully request that they be granted intervention in this docket to oppose Public Counsel's motion, together with such other and further relief as may be unnecessary.

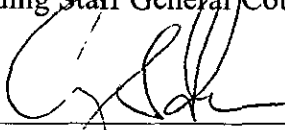
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By 
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ATTORNEYS FOR MITG

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 10 day of June, 2002, to all attorneys of record in this proceeding, including Staff General Counsel and Office of the Public Counsel.


Craig S. Johnson MO Bar No. 28179