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GREENSFELDER, HEMKER & GALE
BELLEVILLE, ILLINOIS

March 21, 2001

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
PO Box 360
Jefferson City, MO 65102-0360

FILED

MAR 23 2001

**Missouri Public
Service Commission**

**Re: In the Matter of the Investigation of the State of Competition in the
Exchanges of Southwestern Bell Telephone Company; Case No. TO-2001-467**

Dear Mr. Roberts,

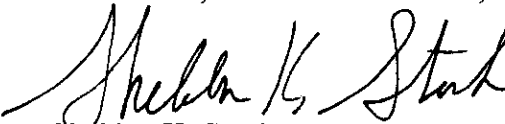
Enclosed for filing with the Commission in the above-referenced case is an original and eight (8) copies of Fidelity Communication Services III, Inc.'s Application To Intervene.

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
453384.1

cc: Office of the Public Counsel
Paul G. Lane, Esq., Southwestern Bell Telephone Co
William K. Haas, Esq., Deputy General Counsel
Attached Service List
Mr. John T. Davis
Mr. Dave Beier

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

FILED

MAR 23 2001

**Missouri Public
Service Commission**

In the Matter of the Investigation of the State)
of Competition in the Exchanges of Southwestern)
Bell Telephone Company.)

Case No. TO-2001-467

**FIDELITY COMMUNICATION SERVICES III, INC.'S
APPLICATION TO INTERVENE**

COMES NOW Fidelity Communication Services III, Inc. ("FCS III") and, pursuant to Section 386.420 RSMo and 4 CSR 240-2.075, respectfully requests that the Commission grant it the right to intervene in the above-styled proceeding. In support of this Application, FCS III states as follows:

1. In accordance with Section 392.245 RSMo, the Commission established this case for the purpose of investigating the state of competition in the exchanges of Southwestern Bell Telephone Company ("SWBT").

IDENTITY OF APPLICANT

2. FCS III 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. FCS III is a "local exchange telecommunications company," "interexchange 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 Section 386.020 RSMo.

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

Sheldon K. Stock
Greensfelder, Hemker & Gale, P.C.
10 South Broadway, Suite 2000
St. Louis, Missouri 63102-1774
sk@greensfelder.com

and

John T. Davis
Fidelity Communication Services III, Inc.
64 North Clark
Sullivan, Missouri 63080

4. FCS III is certified to provide basic local exchange telecommunication services and interexchange telecommunication services in exchanges currently served by SWBT, and is currently arbitrating an interconnection agreement with SWBT in Case No. TO-2001-416.

APPLICANT'S INTEREST AND POSITION IN PROCEEDING

5. FCS III seeks to intervene in this proceeding because it has a direct and pecuniary interest in the Commission's decision on the status of competition in SWBT's exchanges. FCS III expects to compete with SWBT as both a facilities-based and resale provider. In order to protect its interest, FCS III believes it is necessary for it to participate in the Commission's review of the status of competition in SWBT's exchanges.

6. FCS III's interest 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 FCS III's interest.

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

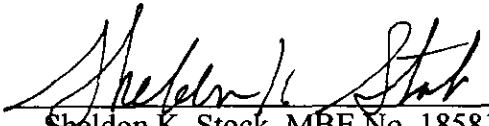
8. Since there is insufficient information currently available, FCS III is uncertain, at this time, of the position it will take in this proceeding. FCS III reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, Fidelity Communication Services III, Inc. respectfully requests the Commission to grant this Application to Intervene.

Dated: March 21, 2001

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By: 
Sheldon K. Stock, MBE No. 18581

sks@greensfelder.com

Jason L. Ross, MBE No. 51428

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(314) 241-9090

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Attorneys for

Fidelity Communication Services III, Inc.

CERTIFICATE OF SERVICE

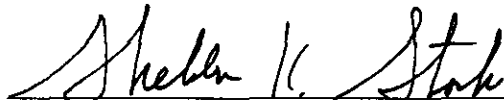
I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 21th day of March, 2001, to:

The parties shown on the attached service list and the following:

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

Paul G. Lane, General Attorney—Missouri
Southwestern Bell Telephone Company
One Bell Center, 35th Floor
St. Louis, Missouri 63101-1976

William K. Haas, Deputy General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102


Sheldon K. Stock

Service List
Case No. TO-2001-467
March 21, 2001

1-800-Reconex, Inc.
(f/k/a Sterling International Funding, Inc.
d/b/a Reconex)
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2500 Industrial Avenue
Hubbard, OR 97032

AccuTel of Texas, Inc.
7900 John W. Carpenter Freeway
Dallas, TX 75247

Allegiance Telecom of Missouri
1950 Stemmons Freeway, Suite 3026
Dallas, TX 75207-3118

American Communication Services of
Kansas City, Inc.
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

BarTel Communications, Inc.
5223 Delmar Boulevard
St. Louis, MO 63108

Brooks Fiber Communications of Missouri, Inc.
701 Brazos, Suite 600
Austin, TX 78701

Buy-Tel Communications, Inc.
6409 Colleyville Boulevard
Colleyville, TX 76034

Central Missouri Telecommunications, Inc.
PO Box 596
Osage Beach, MO 65065

Computer Business Sciences, Inc.
80-02 Kew Gardens Road, Suite 5000
Kew Gardens, NY 11415

Delta Phones, Inc.
PO Box 784
245 Illinois Street
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2nd Century Communications, Inc.
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Suite 50
Tampa, FL 33614

Adelphia Business Solutions Operations, Inc.
121 Champion Way
Canonsburg, PA 15317

ALLTEL Communications, Inc.
One ALLIED Drive
PO Box 2177
Little Rock, AR 72203

AT&T Communications of the Southwest, Inc.
101 West McCarty, Suite 216
Jefferson City, MO 65101

Birch Telecom of Missouri, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108

BTI
(Business Telecom, Inc.)
4300 Six Forks Road, Suite 500
Raleigh, NC 27609

Camarato Distributing, Inc.
900 Camarato Drive
Herrin, IL 62948

Ciera Network Systems, Inc.
2630 Fountainview, Suite 300
Houston, TX 77057

The Cube
(Tin Can Communications Company, L.L.C.)
1063 Wirt Road, Suite 202
Houston, TX 77005

DMJ Communications, Inc.
2525 North Grandview, Suite 900
Odessa, TX 79761

dPi-Teleconnect, L.L.C.
2997 LBJ Freeway, Suite 225
Dallas, TX 75234

Gabriel Communications of Missouri, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63017

Global Crossing Telemanagement, Inc.
(formerly Frontier Telemanagement, Inc.)
2710 Executive Drive
Green Bay, WI 54307

Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

KMC Telecom III, Inc.
3075 Breckinridge Boulevard
Suite 415
Duluth, GA 30096

Level 3 Communications Corporation
(formerly Dobson Wireless, Inc.)
3555 NW 58th, Suite 900
Oklahoma City, OK 73112

Max-Tel Communications, Inc.
PO Box 280
102 W. Franklin
Alvord, TX 76225

MCI Worldcom Communications, Inc.
(Worldcom, Inc.)
701 Brazos, Suite 600
Austin, TX 78701

Missouri Comm South, Inc.
(Comm South Companies, Inc.)
PO Box 821269
6830 Walling Lane
Dallas, TX 75382-1269

Mpower Communications Corp.
(formerly MGC Communications, Inc.)
175 Sully's Trail, Suite 202
Pittsford, NY 14534

Net-Tel Communications Corporation
(Net-Tel Corporation)
1023 31st Street, NW
Washington, DC 20007

EZ Talk Communications, L.L.C.
4727 South Main
Stafford, TX 74777

Global Crossing Local Services, Inc.
(formerly Frontier Local Services, Inc.)
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3235 Satellite Boulevard
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Duluth, GA 30096

Ionex Communications, Inc.
5710 LBJ Freeway, Suite 215
Dallas, TX 75240

LDD, Inc.
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Cape Girardeau, MO 63702

Maxcom, Inc.
10647 Widmer Road
Lenexa, KS 66215

MCImetro Access Transmission Services, L.L.C.
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Austin, TX 78701

McLeodUSA Telecommunications Services, Inc.
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Cedar Rapids, IA 52406

Missouri Telecom, Inc.
PO Box 419
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Monett, MO 65708

Navigator Telecommunications, L.L.C.
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Little Rock, AR 72203

NOW Communications, Inc.
713 Country Place Drive
Jackson, MS 39208

Omniplex Communications Group, L.L.C.
(formerly USA eXchange, L.L.C.)
17 Research Park Drive
St. Charles, MO 63304

Payroll Advance
808 South Baker
Mountain Home, AR 72643

Primary Network Communications
(BroadSpan Communications, Inc.)
11432 Lackland Road
St. Louis, MO 63146

Quick-Tel Communications, Inc.
PO Box 196
456 W Rock Island
Boyd, TX 76023

Qwest Communications Corporation
(USLD Communications, Inc.)
4250 N. Fairfax Drive, 12W002
Arlington, VA 22203

Simply Local Services, Inc.
2225 Apollo Drive
Fenton, MO 63026

Snappy Phone
PO Box 29620
6901 West 70th Street
Shreveport, LA 71129

Sprint Communications Company, L.P.
5454 West 110th Street
Overland Park, KS 66211

TCG Kansas City, Inc.
Teleport Communications Group
Two Teleport Drive
Staten Island, NY 10311

Tel Com Plus
(United States Telecommunications, Inc.)
5251 110th Avenue, North, Suite 118
Clearwater, FL 33760-4837

Tel-Link, L.L.C.
1001 Third Avenue West, Suite 354
Bradenton, FL 34205

The Pager Company
3030 East Truman Road
Kansas City, MO 64127

Phones For All
(Teléfonos Para Todos)
(Preferred Carrier Services, Inc.)
14681 Midway Road, Suite 105
Dallas, TX 75244

QCC, Inc.
(formerly Quest Communications Corporation)
8829 Bond Street
Overland Park, KS 66214

Quintelco, Inc.
1 Blue Hill Plaza
Pearl River, NY 10965

Ren-Tel Communications, Inc.
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Villa Rica, GA 30180

Smoke Signal Communications
(Choctaw Communications, LC)
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TranStar Communications
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Bedford, TX 76095

Universal Telephone
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Wichita, KS 67211-5455

Winstar Wireless, Inc.
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U.S. Telco, Inc.
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Dallas, TX 75244

WorkNet Communications, Inc.
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