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SAMUEL WHITE (1917-1958)
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IRWIN WHITE (1932-1963)

June 14, 1988

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Case No. TA-88-218
In the matter of the application
of American Operator Services, Inc.
for a certificate of service
authority to provide Intrastate
Operator-Assisted Resold
Telecommunications Services

Gentlemen:

Enclosed please find Motion of Midwest Independent Coin
Payphone Association to Intervene in the above captioned
matter. Please file in accordance with Law provided and
inform us as to the disposition of our request.

Respectfully,


Philip R. Newmark

PRN:lw

Enclosures - original and 14 copies

FILED

JUN 15 1988

PUBLIC SERVICE COMMISSION

CR:

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the application)
of American Operator Services, Inc.)
for a certificate of service) Case No. TA-88-218
authority to provide Intrastate)
Operator-Assisted Resold)
Telecommunications Services.)

APPLICATION TO INTERVENE

Midwest Independent Coin Payphone Association ("MICPA")
hereby moves pursuant to 4 C.S.R 240-2.110 for an order
allowing it to intervene in the captioned proceeding.
In support of its Application, MICPA states the following:

1. MICPA is an association of pay telephone service
providers with its principal office at 10810 Industrial
Drive, St. Louis, Missouri, 63132. Several members of
MICPA are authorized by the Commission to provide pay
telephone service in Missouri.

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

Philip R. Newmark
Law Offices of Philip R. Newmark
7777 Bonhomme, Suite 1910
Clayton, MO 63105

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3. MICPA seeks to intervene in the captioned proceed-
ing because its members are vitally interested in all
telecommunications services which could aid in the provision

of efficient service to their customers. The Applicant in this case, American Operator Services, seeks permission to provide operator-assisted long distance telecommunications in competition with other providers of that service, principally AT&T Communications. MICPA believes that its members may derive benefit from the provision of operator-assisted services on a competitive basis in Missouri, and is therefore interested in the course of this proceeding.

4. MICPA is not aware of any other company or entity in the private pay telephone industry which is presently a party to this proceeding. As such, MICPA believes that it can provide a unique point of view to the Commission on the need for competitive operator services in general, and the specific need to certificate American Operator Services in this proceeding.

5. MICPA's interests in this proceeding differ from those of the general public and of the entities presently party to this proceeding. MICPA's intervention would serve the public interest because MICPA would represent a perspective not now present in this proceeding. MICPA therefore satisfies the standards for intervention described in 4 C.S.R. 240-2.110(4).

WHEREFORE, MICPA requests that the Commission allow it to intervene in this proceeding.

Respectfully submitted,



Philip R. Newmark
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Attorney for Applicant
Midwest Independent Coin Payphone
Association

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, United States mail, postage prepaid, to All Parties of Record, this 14th day of June, 1988.

