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BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of the Application of Local )  
Line America, Inc., for a Certificate of )  
Service Authority to provide local tele- )  
communications services to the public in )  
the State of Missouri. )

Case No. TA-97-251

CONCURRING OPINION OF COMMISSIONER CONNIE MURRAY

I write not to disagree with the Commission's grant of a certificate of service authority to provide basic local telecommunications services to Local Line America, Inc., but rather to make a statement about two issues.

First, I find the company's request for waiver of Rule 4 CSR 240-33.040(3)(4)--Billing and Preferred Payment Plans--to be a reasonable request. Because of the nature of the service, I do not believe it necessary to require the company to give the customer 21 days from the rendition of a bill to pay the charges. In an effort to protect the customer from disconnection without adequate notice, the majority of the Commission chose not to waive the requirement of this rule.

The Stipulation and Agreement filed by the parties on May 20, 1997 states that all parties agree that ten days is a reasonable and adequate amount of notice to be provided to customers of the described service. All Local Line customers will be required to sign a Customer Service Agreement and pay a service initiation charge and the first full or partial month's service charge prior to receiving service. Customers will be charged a set price for service which will not change from month to month and which will always be prepaid. Requiring the company to render

a bill 21 days prior to due date will result in the customer receiving a bill approximately one week after having made a payment. This could confuse the customer and will not, in my opinion, adequately serve its intended purpose of reminding the customer to pay the bill on the date established in the agreement. A reminder ten days prior to the due date would appear to be more effective.

The second issue I raise concerns the options or "frills" which will be marketed to each customer. Local Line proposes to serve mostly high-risk customers, i.e. those who are unable to obtain telephone service elsewhere because of credit problems or delinquent payment histories. While I am happy to see the company offer telephone services to high-risk customers, I am troubled that the following optional services will be included as prominent choices on the Customer Service Agreement: call waiting; call forwarding; "3-way" calling; unpublished number; speed dial; call return; or a combination of all options above. Customers with credit problems or delinquent payment histories often demonstrate poor judgment in money matters. They are the most likely to choose unnecessary options and the least likely to need or afford them. The public would be better served if this company and its competitors would voluntarily refrain from encouraging customers to purchase unnecessary options.

**Respectfully submitted,**

  
**Connie Murray, Commissioner**

Dated at Jefferson City, Missouri, on  
this 17th day of September, 1997.