

JEREMIAH D. FINNEGAN

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4049 PENNSYLVANIA, SUITE 300
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May 5, 1988

Mr. Harvey G. Hubbs, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Application To Intervene By The
Missouri Hotel and Motel Association

Dear Mr. Hubbs:

Enclosed please find the original and fifteen (15) copies of Application To Intervene By The Missouri Hotel And Motel Association in the above-captioned cause.

Please file and call to the attention of the Commission and please return a file-stamped copy to me.

Very truly yours,


Jeremiah D. Finnegan

JDFljt

Enclosures

cc: Public Counsel
Mark P. Johnson
Charles L. Jones
Kevin M. Pistilli

FILED

MAY 10 1988

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

In the matter of the Application of)
American Operator Services, Inc. for)
a Certificate of Public Convenience)
and Necessity to Provide Intrastate)
Operator-Assisted Resold Tele-)
communications Services.)

Case No. TA-88-28 MAY 10 1988

PUBLIC SERVICE COMMISSION

APPLICATION TO INTERVENE BY THE
MISSOURI HOTEL AND MOTEL ASSOCIATION

COMES NOW the intervenor, pursuant to Rule 4 C.S.R. 240-2.110 of the Commission's Rules of Practice and Procedure, and states as follows:

1. That the intervenor is the Missouri Hotel and Motel Association, a trade association of various hotels and motels throughout the State of Missouri.

2. That copies of all notices, orders and correspondence in this proceeding be mailed to attorney for intervenor and its Executive Vice-President at the following addresses:

Charles L. Jones, Executive Vice-President
Missouri Hotel and Motel Association
119 Madison
Jefferson City, Missouri 65101

Jeremiah D. Finnegan
Attorney at Law
4049 Pennsylvania, Suite 300
Kansas City, Missouri 64111

3. That intervenor has only recently been advised from a commission press release that the Commission has established an intervention deadline of May 5, 1988 for all interested parties.

4. That said press release indicated that under the Application by American Operator Services, Inc., Applicant is seeking authority to provide operator assistance to the public from facilities provided by hotels, motels, privately owned pay

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telephones, hospitals and other large institutions and that the Commission has ordered its Staff to investigate prior and proposed operations.

5. That due to a delay in receiving information requested of Applicant, intervenor was unable to make a decision on whether it should intervene in this proceeding until this date and that based on the information supplied to date, intervenor is not prepared to declare whether it supports or opposes the Application.

6. That intervenor has an interest in proceeding which is different from that of the general public and the granting of the intervention would serve the public interest.

WHEREFORE, intervenor respectfully prays that the Commission grant its intervention in this proceeding and for such other relief as the Commission shall deem just and proper.

Respectfully submitted,


JEREMIAH D. FINNEGAN
Missouri Bar No. 18416
4049 Pennsylvania, Suite 300
Kansas City, Missouri 64111
(816) 753-1122


CERTIFICATE OF MAILING

I hereby certify that a copy of this Application To Intervene was mailed this 5th day of May, 1988, postage prepaid to the Public Counsel and to Mark P. Johnson, Spencer, Fane, Britt & Browne, 400 Commerce Bank Bldg., 1000 Walnut Street, Kansas City, Missouri, 64106-2140.


Jeremiah D. Finnegan

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

JEREMIAH D. FINNEGAN, having first been duly sworn on his oath, states that he is the telephone and utilities counsel for the Missouri Hotel and Motel Association, that he is authorized to sign the Application to Intervene, that he signed the same on behalf of the Missouri Hotel and Motel Association, that he read the foregoing Application to Intervene and that the contents thereof are true to the best of his knowledge and belief.


Jeremiah D. Finnegan

5th Subscribed and sworn to before me, a Notary Public, this day of May, 1988.


Notary Public

My Commission Expires:

LAURA J. TAYLOR
NOTARY PUBLIC STATE OF MISSOURI
JACKSON CO.
MY COMMISSION EXP. MAY 01, 1989
ISSUED THRU MISSOURI NOTARY ASSOC.