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July 29, 1988

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

Re: Alternative Operator Services  
Case No. TA-88-218 et al.

Dear Mr. Hubbs:

I enclose an original and fourteen (14) copies of an Application to Intervene for filing in connection with the above-referenced matter on behalf of the following companies: Contel of Missouri, Inc., Contel System of Missouri, Inc., Webster County Telephone Company, Missouri Telephone Company, Eastern Missouri Telephone Company, Mid-Missouri Telephone Company, Citizens Telephone Company of Higginsville, Missouri, Northeast Missouri Rural Telephone Company and Fidelity Telephone Company. Would you please bring this to the attention of the appropriate Commission personnel? An extra copy is enclosed which I request you stamp "Filed" and return to me.

I have caused two copies of this filing to be served on the Office of the Public Counsel.

Thank you for your assistance with this matter.

Sincerely,

HAWKINS, BRYDON, SWEARENGEN  
& ENGLAND P. C.

By:

  
Paul A. Boudreau

PAB:sw  
Enclosures

cc: Office of the Public Counsel  
All Parties of Record

FILED

JUL 29 1988

PUBLIC SERVICE COMMISSION

FILED

JUL 29 1988

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

PUBLIC SERVICE COMMISSION

In the matter of the application )  
of American Operator Services, Inc. )  
for a certificate of service authority ) Case No. TA-88-218  
to provide intrastate operator assisted )  
resold telecommunications services. )

In the matter of Teleconnect Company )  
for authority to file tariff sheets )  
designed to establish Operator Services ) Case No. TR-88-282  
within its certificated service area )  
in the State of Missouri. )

In the matter of Dial U.S. for authority )  
to file tariff sheets designed to )  
establish Operator Services within its ) Case No. TR-88-283  
certificated service area in the State )  
of Missouri. )

In the matter of Dial U.S.A. for )  
authority to file tariff sheets designed )  
to establish Operator Services within ) Case No. TR-88-284  
its certificated service area in the )  
State of Missouri. )

In the matter of International )  
Telecharge, Inc. for authority to file )  
tariff sheets designed to establish ) Case No. TR-89-6  
Operator Services within its )  
certificated service area in the State )  
of Missouri. )

APPLICATION TO INTERVENE

Come now Contel of Missouri, Inc., Contel System of  
Missouri, Inc., Webster County Telephone Company, Missouri  
Telephone Company, Eastern Missouri Telephone Company, Mid-  
Missouri Telephone Company, Citizens Telephone Company of  
Higginsville, Missouri, Northeast Missouri Rural Telephone  
Company and Fidelity Telephone Company (hereinafter collectively

24.

referred to as "Applicants") and for their Application to Intervene in the above-captioned matter state that:

1. Applicants currently provide telecommunications services to members of the public located in the areas certificated to them by the Commission. Applicants are "telecommunications companies" and "public utilities" as those terms are defined by § 386.020, RSMo (1987 Supp.) and are, therefore, subject to the jurisdiction, regulation and control of the Missouri Public Service Commission ("Commission") as provided by law.

2. All correspondence, communications, orders and decisions in this matter should be addressed to the following:

Howard Keister  
Contel of Missouri, Inc.  
P. O. Box 307  
Wentzville, Missouri 63385  
314/327-3011

Wayne Clark  
Missouri Telephone Company  
Eastern Missouri Telephone Company  
P. O. Box 180  
Bolivar, Missouri 65613  
417/326-8000

Harold A. Jones  
Mid-Missouri Telephone Company  
Box 38  
Pilot Grove, Missouri 65276  
816/834-3311

Howard Fisher  
Citizens Telephone Company  
of Higginsville, Missouri  
P. O. Box 737  
Higginsville, Missouri 64037  
816/584-2111

Ray Ford  
Northeast Missouri Rural  
Telephone Company  
718 South West Street  
Green City, Missouri 63545  
816/874-4111

Terry Troughton  
Fidelity Telephone Company  
64 North Clark  
Sullivan, Missouri 63080  
314/468-8081

W. R. England, III  
Paul A. Boudreau  
HAWKINS, BRYDON, SWEARENGEN  
& ENGLAND P. C.  
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314/635-7166

3. The above-referenced consolidated matters involve a request by American Operator Services, Inc. for authority to provide alternative operator services (AOS) as well as requests by certain other telecommunications companies to implement tariffs for the offering of AOS.

4. Applicants provide operator services to the public throughout the State of Missouri, directly or indirectly, and, therefore, have a continuing interest concerning the terms and conditions under which alternative services may be authorized by the Commission. Applicants also have an interest in all service

offerings that may have an impact, direct or indirect, on their customers. AOS appears to be such a service. Therefore, Applicants' interest in this matter is different from that of the general public.

5. Applicants' expertise in and perspective on the provision of telecommunications services in this State will aid the Commission in resolving the issues related to this proceeding. Consequently, Applicants' intervention and participation will serve the public interest.

WHEREFORE, Applicants respectfully request that the Commission issue an order authorizing them to intervene in the above-captioned proceedings.

Respectfully submitted,



W. R. England, III #23975  
Paul A. Boudreau #33155  
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& ENGLAND P. C.  
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Attorneys for Contel System of  
Missouri, Inc., Webster County  
Telephone Company, Missouri  
Telephone Company, Eastern Missouri  
Telephone Company, Mid-Missouri  
Telephone Company, Citizens  
Telephone Company of Higginsville,  
Missouri, Northeast Missouri Rural  
Telephone Company and Fidelity  
Telephone Company

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed, United States Mail, postage prepaid, this 24th day of July, 1988, to:

Mr. Jeffrey T. Smith  
Attorney at Law  
2550 M Street, N.W.  
Washington, D.C. 20037

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Dallas, TX 75202

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1000 Walnut Street  
Kansas City, MO 64106-2140

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W. R. England, III