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November 16, 1988

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

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

Dear Mr. Hubbs:

HENRY ANDRAE

RICHARD S. BROWNLEE I

MICHAEL A. DALLMEYER

DUANE E. SCHREIMANN

DOUGLAS L.VAN CAMP

GERALD E. ROARK

MICHAEL G. BERRY DONALD C. OTTO, JR. HALLIE H. GIBBS TI

KELLY POOL

Enclosed please find original plus fourteen (14) copies of Teleconnect's Reply to Response of American Operator Services, Inc., to Teleconnect's Motion to Remove Tariff Suspension for filing in the above referenced matter on behalf of Teleconnect

Thank you for your assistance.

Very truly yours,

HENDREN AND ANDRAE

Richard S. Brownlee, III

RSB/k Enclosures cc: All Counsel of Record

NOV 18 1988
TUBLIC SERVICE COMMISSION

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 ) authority to provide Intrastate ) Operator-Assisted Resold ) Telecommunications Services.

SSION FILED ARIC SEMINE COMMISSION

TELECONNECT'S REPLY TO RESPONSE
OF AMERICAN OPERATOR SERVICES
INC. TO TELECONNECT'S MOTION
TO REMOVE TARIFF SUSPENSION

Comes now Teleconnect, by and through its attorneys, and in reply to American Operator Services, Inc.'s response to Teleconnect's Motion To Remove Tariff Suspensions states as follows:

- 1. Unlike Teleconnect and International Telecharge Inc.,
  American Operator Services, Inc. is not a certificated carrier
  in the State of Missouri and, therefore, has no present authority
  to operate within the State of Missouri, further, it has yet
  to file any tariffs regarding any telephone operations within
  the State of Missouri.
- 2. American Operator Services, (as brought out on a cross-examination of Jamie Bryant, American Operator Services witness) has been, and is presently, processing intrastate Missouri calls.
- 3. Therefore, American Operator Services assertion that the removal of Teleconnect's tariff suspension would provide Teleconnect with an unfair advantage as not well taken. Teleconnect has followed the proper procedures, first obtaining certification and then seeking approval of tariffs prior to commencing operations within the State of Missouri. American Operator Services, on the other hand, according to their own testimony, has begun

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operations in the State of Missouri prior to being certificated.

WHEREFORE Teleconnect respectfully requests that the commission reject the arguments of American Operator Services, Inc. and grant Teleconnect's Motion To Remove Tariff Suspension.

Respectfully submitted,
HENDREN AND ANDRAE

Richard S. Brownlee, III 235 E. High Street P.O. Box 1069 Jefferson City, MO 65102

Attorneys for Teleconnect Company

## Certificate of Service

I hereby certify that a true copy of the foregoing was mailed on the **L** day of November, 1988, by prepaid United States mail to all counsel of record.

Richard S. Brownlee, III