SWIDLER & BERLIN CHARTERED 3000 K STREET, N.W. SUITE 300 WASHINGTON, D.C. 20007-3851 (202) 944-4300 ANDREW D. LIPMAN DIRECT DIAL ATTORNEY-AT-LAW (202) 944-4833 TRLEX: 701131 TELECOPIER (202) 944-4296 September 7, 1988 Mr. Harvey G. Hubbs Executive Secretary Missouri Public Service Commission Harry S Truman Building

Corner, High and Broadway Room 530 Jefferson City, Missouri

> Application of American Operator Services for Certificate of Public Convenience and Necessity Case No. TA-88-218

Dear Mr. Hubbs:

Enclosed for filing please find an original and fourteen (14) copies of Operator Assistance Network's Late-Filed Petition to Intervene in the above-captioned matter. Please "file" stamp the extra, enclosed copy and return it to this office.

Thank you for your attention to this matter.

Very truly yours,

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Andrew D. Lipman

Enclosures

PILED

SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of:

Application of American Operator)
Services, Inc., for a Certificate)
of Public Convenience and Necessity)
to Provide Intrastate Operator-)
Assisted Resold Telecommunications)
Services

Docket No. TA-88-218

PETITION FOR LATE-FILED INTERVENTION

Operator Assistance Network ("OAN"), by its undersigned counsel, hereby requests that the Commission, pursuant to 4 CSR 240-2.110, grant it leave to intervene in the above-captioned proceeding. In support of this request, OAN states the following:

- (1) OAN provides various billing and collection services to interexchange carriers ("IXCs") and Operator Service Providers ("OSPs") by enabling them to share the significant costs of securing billing and collection services from Bell Operating Companies ("BOCs") and other local exchange companies ("LECs").
- (2) The subject matter of the above-captioned proceeding is the terms and conditions under which OSPs will be able to operate in the state of Missouri.

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PUBLIC SERVICE COMMISSION

(3) Because OAN performs billing and collection service for some OSPs, the outcome in the above-captioned proceeding will directly affect the ability of OAN and its customers to offer services in Missouri. (4) Given the nature of its operations, OAN does not believe that its interests are represented by any other party to this proceeding. Because OAN was previously unaware of this proceeding, it was unable before this time to seek intervention. OAN submits that its intervention and participation in this proceeding at this time will not adversely affect any other parties to this action. For the foregoing reasons, OAN respectfully requests that the Commission grant it leave to intervene in this proceeding and that a copy of all notices, correspondence, orders and other materials hereafter filed in these dockets be served on the undersigned counsel for OAN. Respectfully submitted, Andrew D. Lipman Jean L. Kiddoo SWIDLER & BERLIN 3000 K Street, N.W. Harvey M. Berg Suite 300 General Manager Washington, D.C. 20007 OPERATOR ASSISTANCE NETWORK (202) 944-4300 6611 Valjean Avenue Van Nuys, CA 91406 (818) 786-4626 September 7, 1988 - 2 -

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 1988, copies of
Petition For Late-Filed Intervention have been sent by firstclass, postage-prepaid mail to the following:

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