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ADMITTED IN KANSAS

* * ADMITTED IN KANSAS AND MISSOURI ALL OTHERS ADMITTED IN MISSOURI

PLEASE REPLY TO THE MISSOURI OFFICE 3332800-2 FILE NO.

November 7, 1988

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

Case No. TA-88-218

Dear Mr. Hubbs:

Please find enclosed for filing the original and 14 copies Inc. American Operator Services, the Response of to Remove Tariff Suspension. By copy of Teleconnect's Motion this letter, I have mailed a copy of the enclosed to all parties of record.

Very truly yours,

Han 1 April

MPJ/wsh Enclosures

cc: All Parties of Record

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PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of the applica	tion)
of American Operator Services	s, Inc.)
for a certificate of service) Case No. TA-88-218
authority to provide Intrasta	ate)
Operator-Assisted Resold	j
Telecommunications Services.	j

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

Comes now American Operator Services, Inc., doing business as National Telephone Services ("NTS"), and in response to the motion of Teleconnect, Inc. to remove the suspension of its proposed operator services tariff, states the following:

The sole ground cited by Teleconnect in support of its motion is that Public Counsel has removed its objection to Teleconnect's provision of operator services. Teleconnect fails to mention that several terms Teleconnect's proposed provision of operator services were questioned at the hearing, including, for example, its failure to include its name on local exchange company bills to end proposed hospitality service which would users and а intentionally mislead callers as to carrier identification.

Several additional considerations militate against granting Teleconnect the substantial competitive advantage of obtaining authority to provide operator services in Missouri before any other competitive operator service provider. Teleconnect would obtain an insurmountable competitive

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PUBLIC SERVICE COMMISSION



advantage in the upcoming presubscription of Bell-owned pay telephones (currently slated to begin on January 1, 1989). Teleconnect would obtain a lead in the marketing of competitive operator services to hotels, motels, and other "0" traffic aggregators in Missouri. Finally, the efficiency and reliability of Teleconnect's network has yet to be established to the Commission, particularly as it relates to Teleconnect's ability to provide operator services.

In short, NTS requests nothing more than equitable treatment vis-a-vis other operator services providers. At this time, there is no reason to grant Teleconnect the huge competitive advantage it seeks through the subject motion.

WHEREFORE, NTS respectfully requests that the Commission deny Teleconnect's motion to remove the suspension of its proposed operator services tariff.

Respectfully submitted,

SPENCER FANE BRITT & BROWNE

Mark P. Johnson

1400 Commerce Bank Building

1000 Walnut Street

Kansas City, Missouri 64106-2140

(816) 474-8100

NATIONAL TELEPHONE SERVICES, INC.

Brad E. Mutschelknaus
6100 Executive Boulevard,
4th Floor
Rockville, Maryland 20852
(301) 468-0307

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, United States mail, postage prepaid to All Parties of Record, this 8% day of November, 1988.

Smill for form

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