



State of Missouri

John Ashcroft, Governor

Office of the Public Counsel

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Public Counsel

November 18, 1988

FILED

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PUBLIC SERVICE COMMISSION

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

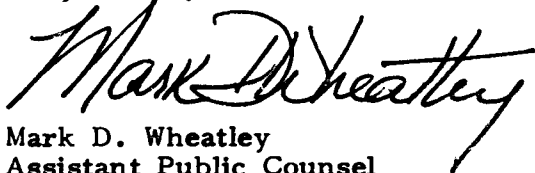
Re: TA-88-218, et al.

Dear Mr. Hubbs:

Enclosed for filing in the above-referenced case please find the original and fourteen copies of Response of the Office of the Public Counsel to Teleconnect's Motion to Remove Tariff Suspension. Please "file" stamp the extra enclosed copy and return it to this office. I have on this date mailed or hand-delivered copies to all counsel of record.

Thank you for your attention to this matter.

Very truly yours,



Mark D. Wheatley
Assistant Public Counsel

MDW:kl

Enclosures

cc: Counsel of record

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) Case No. TA-88-218
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) Case No. TR-88-283
within its 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) Case No. TR-88-284
within 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.)

RESPONSE OF THE OFFICE OF THE
PUBLIC COUNSEL TO TELECONNECT'S
MOTION TO REMOVE TARIFF SUSPENSION

Comes now the Office of the Public Counsel (Public Counsel) and respectfully submits the following response to the Motion to Remove Suspension of Tariff filed in the above-entitled cause on behalf of Teleconnect Long Distance Services and Systems (Teleconnect).

In its Motion, Teleconnect has requested the Commission to lift the suspension of Teleconnect's tariff regarding the provision of operator services for the reason that "Public Counsel agreed that they

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would have no objection to Teleconnect initiating services in the State of Missouri" and that, therefore, "there were no other remaining parties that had any objection to Teleconnect Company providing services in the State of Missouri".

While it is true that Public Counsel generally approves of Teleconnect's plan to add operator services to its service offering, Public Counsel believes that the suspension of Teleconnect's tariff should not be lifted prior to the conclusion of this case. Since the hearing in this case has already been held and the case is now in the briefing stage, this case should be concluded in a reasonably short time.

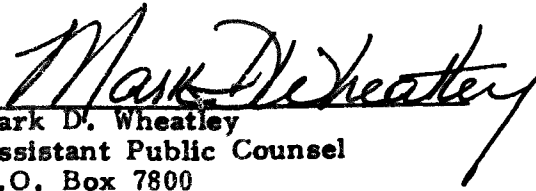
In its Order to be entered at the conclusion of this case, it is conceivable that the Commission may desire to impose certain requirements or restrictions upon the provision of operator services within the State of Missouri. Some or all of those requirements or restrictions may be directly applicable to Teleconnect and may be in addition to or different from the provisions of Teleconnect's present proposed tariff. Therefore, prudence would require that the suspension of Teleconnect's tariff not be lifted until the conclusion of this case.

For these reasons, Public Counsel would respectfully request that the Commission deny Teleconnect's Motion to Remove Suspension of Tariff.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By



Mark D. Wheatley
Assistant Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102
314/751-4857

I hereby certify that a copy of the
foregoing has been mailed or hand-
delivered to all parties of record
on this 18th day of November, 1988.

