



**Southwestern Bell
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May 4, 1988

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

Re: Case No. TA-88-218

Dear Mr. Hubbs:

Enclosed please find an original and fourteen (14) copies of Application to Intervene filed on behalf of Southwestern Bell Telephone Company in the case referenced above.

Please stamp "Filed" on the extra enclosed copy and return to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this filing to the attention of the Commission.

Very truly yours,


Thomas J. Horn

Enclosures

cc: All parties of record

FILED
MAY 5 1988
PUBLIC SERVICE COMMISSION

BEFORE THE MISSOURI 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) Case No. TA-88-218
Operator-Assisted Resold)
Telecommunications Services)

APPLICATION TO INTERVENE

Southwestern Bell Telephone Company (Southwestern Bell)
hereby requests an Order of the Commission allowing it to
intervene in this proceeding, pursuant to 4 CSR 240-2.110,
and in support thereof states:

1. Southwestern Bell is a Missouri corporation with
its principal office at 1010 Pine Street, St. Louis,
Missouri 63101. It is a "local exchange telecommunications
company" and a "public utility," as those terms are defined
in Section 386.020, RSMo. Supp. 1987, and is duly authorized
to provide telecommunications service within the state of
Missouri.

2. All correspondence, pleadings, orders, decisions
and communications regarding this proceeding should be sent
to:

Durward D. Dupre
Vice President and General Solicitor
(Missouri)
Southwestern Bell Telephone Company
100 North Tucker, Room 618
St. Louis, Missouri 63101

3. Southwestern Bell Telephone Company seeks
intervention for the following reasons:

a. As a provider of a variety of
telecommunications services in Missouri, Southwestern Bell

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is extremely interested in the requirements under which the Commission will provide certification to alternate operator services providers and how and to what extent regulation is to be achieved by the Commission on an ongoing basis. Since any certification of American Operator Services, Inc. (AOS, Inc.) will be the first case, or among the first cases, to interpret the extent and provision of such services, precedent is very likely to be set which will affect Southwestern Bell.

b. Southwestern Bell has some specific concerns related to provision of alternate operator services as proposed in Docket TA-88-218. These concerns include, but are not limited to: inability of users to select local exchange carrier operators upon request, inability to access emergency services (possibly hampering public safety), lack of user notification as to alternate operator call handling and charges, and designation of the "0" button for use by other than the local exchange company.

c. Southwestern Bell believes the use of the "0" button should continue to be reserved for direct access to the local exchange company operator.

d. Southwestern Bell is not aware of companies certified in Missouri specifically to provide alternate operator services. Southwestern Bell believes those companies currently providing alternate operator services in Missouri are doing so under reseller or interexchange carrier certification.

e. Southwestern Bell does not seek to unduly delay certification of American Operator Services, Inc., but believes certain issues relative at least to Private Coin and perhaps also to alternate operator services providers in general must be addressed. If the Commission desires to issue certification and open a generic docket to investigate alternate operator service providers, then Southwestern Bell will participate in that generic docket.

4. As a local exchange telecommunications company, Southwestern Bell's interests in this proceeding differ from those of the general public. Southwestern Bell's intervention would serve the public interest because it would represent a perspective not now present in this proceeding. Southwestern Bell therefore satisfies the relative standards for intervention prescribed in 4 CSR 240-2.110(4).

WHEREFORE, Southwestern Bell requests that it be permitted to intervene in this proceeding.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Thomas J. Horn
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this 5th day of May, 1988 to all parties of record in this case.

Thomas J. Horn
Thomas J. Horn