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Missouri Public Service Commission

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March 31, 1989

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Staff Director

HARVEY G. HUBBS
Secretary

MARY ANN YOUNG
General Counsel

FILED

MAR 31 1989

PUBLIC SERVICE COMMISSION

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

Re: Case No. TA-88-218 - 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, as consolidated.

Dear Mr. Hubbs:

Enclosed for filing in the above-captioned case is an
original and fourteen (14) conformed copies of Staff's Response
to Motion for Expedited Consideration. Copies have been sent
this date to all parties of record.

Thank you for your assistance in this matter.

Sincerely,

Charles Brent Stewart

Charles Brent Stewart
Assistant General Counsel

CBS:nsh

Enclosures

cc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAR 31 1989
PUBLIC SERVICE COMMISSION

In the matter of the application)
of American Operator Services, Inc.)
for a certificate of service) Case No. TA-88-218
authority to provide Intrastate)
Operator-Assisted Resold)
Telecommunications Services.)

In the matter of Teleconnect)
Company for authority to file)
tariff sheets designed to establish) Case No. TR-88-282
Operator Services 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) Case No. TR-88-283
Services 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) Case No. TR-88-284
Services 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) Case No. TR-89-6
establish Operator Services within)
its certificated service area in)
the State of Missouri.)

STAFF'S RESPONSE TO MOTION FOR EXPEDITED CONSIDERATION

Comes now the Staff of the Missouri Public Service Commission (Staff) and for its Response to the Motion for Expedited Consideration filed on March 10, 1989 by Applicant American Operator Services, Inc. (AOSI) states that:

1. Applicant AOSI, in its Motion For Expedited Consideration, expressed the urgent need for a Commission decision in this docket given the upcoming deadlines in Southwestern Bell's pay telephone presubscription process.

2. Judge Harold Greene's December 23, 1988 ruling in Civil Action 82-0192 requires interexchange carriers, at the time of the initiation of the prescribed service, to have appropriate state certification to carry intrastate interLATA calls or, in the alternative, to have made arrangements to have such calls transferred to a certified carrier in order to commence providing service from the

interexchange carrier's presubscribed pay telephones. (See Attachment 1, p. 5).

3. Staff understands that on February 9, 1989 Southwestern Bell requested all participating interexchange carriers to provide confirmation by March 15, 1989 showing that these carriers have either received a Missouri certificate or have made alternative arrangements for a certified carrier to handle their intrastate interLATA traffic. According to Staff's review, a majority of participating carriers in the initial balloting process do not have a certificate of service authority, (See Attachment 2), but all such non-certificated carriers have informed Southwestern Bell officials that they have made arrangements with a certified carrier to carry their intrastate traffic.

4. Staff traditionally has taken the position that Missouri law requires both a certificate of service authority and Commission-approved tariffs before a carrier may lawfully provide intrastate service. In this regard, Staff believes that Southwestern Bell's alternative requirement that participating carriers make arrangements with "certified" carriers does not completely fulfill the requirements of Missouri law. Unfortunately, as Southwestern Bell converts more public and semi-public pay telephones over to equal access, more pay telephones may be served by carriers who lack full authorization to provide service.

5. In an effort to avoid the conversion of service to carriers who do not possess both a certificate of service authority and Commission-approved operator services tariffs, the General Counsel's Office is preparing letters to be sent to each participating carrier to inform them of Missouri's statutory requirements. Should any carrier not seek proper Commission authorization, the Staff may subsequently seek Commission authority to seek statutory penalties.

6. As a further complication, currently there are several certificate applications and tariff filings relating to the provision of operator services now pending before the Commission outside of Case No. TA-88-218 et al. These include ALLNET Communication Services, Inc. (tariff no. 8900162), AmeriCall Dial O Services, Inc. (Case No. TA-89-153), and MCI (tariff no. 8900370).

7. On March 7, 1989, the Commission in its Order and Notice in Case No. TA-89-164 (Telesphere Network, Inc. stated that:

We are aware of the opinion that, until there is a resolution of the issues in Case No. TA-88-218, no immediate action shall be taken on pending applications for authority to provide operator services.

(See also Order and Notice, Case No. TA-89-153).

8. Pursuant to these Commission rulings the Staff has withheld any final Staff recommendations in all pending operator service filings pending the outcome of Case No. TA-88-218 et al. In some instances, the companies have voluntarily extended the effective date of their tariffs based on discussions with Staff. The Staff at this time, however, intends to request suspension of the tariffs where the effective date is likely to occur before a resolution of Case No. TA-88-218, et al.

9. Unfortunately, the Southwestern Bell presubscription process deadlines have aggravated the situation. (See Attachment 3).

10. The Staff desires to act on all pending operator services filings as expeditiously as possible and is prepared to make its final recommendations in those cases once the instant case has been decided. In addition, Staff here reiterates its position that a rulemaking proceeding, which would apply to all providers of operator services in Missouri, should be undertaken as soon as practicably possible after a decision is issued in this proceeding.

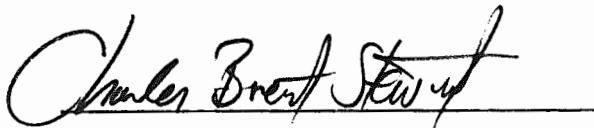
Respectfully submitted,


Charles Brent Stewart
Assistant General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
(314)751-8701

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all parties of record on this 31st day of March, 1989.



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

WESTERN ELECTRIC COMPANY,
INC., et al.,

Defendants.

Civil Action No. 82-0192
(HHG)

FILED ✓

DEC 23 1988

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

MEMORANDUM

In response to its Opinion dated October 14, 1988 and its subsequent Order of November 9, 1988, the Court received plans from each of the Regional Companies for the presubscription of public telephones they own. The plans are comprehensive and demonstrate commendable efforts by the Regional Companies to comply with the words and the spirit of the presubscription order issued by the Federal Communications Commission¹ for residences and businesses that the Court held was to govern procedures for public

¹ Investigation of Access and Divestiture Related Tariffs, 101 FCC 2d 911, 936, Appendix B (1985), as corrected, June 24, 1985 (slip op.), on reconsideration, 101 FCC 2d 935 (1985), on further reconsideration, 102 FCC 2d 503 (1985) (FCC Presubscription Order).

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telephones as well.² The extremely limited oppositions the Court has received to these plans are a further indication of the merit and thoroughness of the plans.

1. Some opposition has been raised to several of the plans with regard to price caps and rate regulation. Under the FCC Presubscription Order regarding businesses and residences, no interexchange carrier may

charge its assigned customers a rate for its service that will exceed the highest rate charged by a dominant interexchange carrier for MTS-type service without the customer's consent.³

In their efforts to apply this language to public telephones, the Regional Companies have arrived at different results. Some of the plans provide that no interexchange carrier may charge for its services from allocated phones at a rate higher than the highest rate charged by a dominant carrier without the consent of the premises owner,⁴ while others require the consent of the actual caller regardless of whether the phone has been allocated or affirmatively

² United States v. Western Electric Co. Order at 3 (October 14, 1988).

³ FCC Presubscription Order, supra note 1, at Appendix B ¶ 30.5.

⁴ U S West Plan at 6; BellSouth Plan at 10.

presubscribed.⁵ In its opposition, National Telephone Services (NTS) argues that all that is required is the consent of the premises owner.⁶

This issue falls essentially within the area of rate setting -- an area in which this Court has long deferred to the expertise of the FCC. In this particular instance, moreover, there is even more reason to defer to the judgment of the FCC inasmuch as the Regional Companies are interpreting an FCC order. The Court will therefore approve the Regional Company plans in this respect in their current form, subject to possible future FCC rulings as to the precise contours of the price caps placed on interexchange carriers in the public telephone context.

2. Similarly, NTS objects to a provision in the BellSouth plan requiring calls transferred from a participating carrier to another carrier to be priced from the originating location rather than from the point of transfer. This is also a question of ratemaking and should

⁵ Ameritech Plan at 7-12, NYNEX Plan at 6-7, Bell Atlantic Plan at 6. The reasoning underlying most of these proposals is that the caller from a public phone -- even a phone that has been presubscribed by a premises owner -- is most like a residential phone user whose phone has been allocated to a particular interexchange carrier: they did not choose the carrier.

⁶ Opposition of National Telephone Service to Certain Aspects of Regional Companies' Public Telephone Presubscription Plans at 11 (December 16, 1988).

be left to the FCC and state regulators. In fact, this precise issue appears to be now pending before the FCC.⁷ Because it is likely that BellSouth's requirement will result in inconvenience to customers, this provision should not be a part of BellSouth's plans at least until the FCC resolves this issue. All of the plans will, in any event, be subject to future FCC determinations as to the proper methods of pricing such transferred calls.

3. Several of the plans require that an interexchange carrier be either state-certified for the provision of intrastate inter-LATA service or have applied for such state-certification before it may be placed on the ballot.⁸ With regard to the presubscription of residential and business telephones, the FCC has held that state certification to provide such intrastate service is irrelevant to a carrier's

⁷ Petition for Order to Require AT&T to Establish a Through-Rate and Reasonable Division of Charges, filed by NTS, November 15, 1988.

⁸ BellSouth's Plan requires interexchange carriers to provide "proof of authorization to provide intrastate service" before it will place a carrier on its ballots. BellSouth Plan at 10-11. Pacific Telesis requires carriers to have applied for certification prior to December 2, 1988. Pacific Telesis Plan at 6. The other Regional Companies require only that carriers comply with all applicable federal, state, and local laws and regulations. See, e.g., NYNEX Plan at 5; Ameritech's Plan at 17-18.

eligibility to take part in the balloting process.⁹ This Court likewise holds that all plan requirements that a carrier either be state certified or have applied for state certification prior to the start of balloting should be deleted.

As several of the Regional Companies as well as NTS point out, however, if the carriers are not certified to carry intrastate inter-LATA calls by the time presubscription service is implemented, they will not be able to carry some calls made from the phones allocated to them.¹⁰ Therefore, at the time of the initiation of presubscribed service a carrier must either have obtained appropriate certification to carry intrastate inter-LATA calls as well as interstate calls, or have made arrangements to transfer such calls to a certified carrier in order to commence providing service from its presubscribed phones. Blocking intrastate inter-LATA calls is not an acceptable alternative. Therefore, telephones served by carriers unable to carry such traffic or make suitable transfer arrangements by the date of initiation of presubscribed service should be allocated

⁹ In the matter of Southwestern Bell Telephone Balloting and Allocation Procedures, Memorandum Opinion & Order, Mimeo No. 5982, (July 24, 1985), aff'd, FCC 85-638 (December 12, 1985).

¹⁰ See, e.g., NTS Opposition at 5-7; BellSouth Plan at 10-11.

according to the procedures set forth in the Regional Company plans.

4. Finally, International Telecharge, Inc. (ITI) objects to the requirement in most of the plans that carriers must be able to provide international service. ITI notes correctly that the FCC presubscription order for business and residential telephones requires only that the carriers be able to provide service to all points within the continental United States.¹¹ To the extent that any of the plans require the carriers themselves to provide international service, they go well beyond what may properly be required of a carrier before it can participate in the balloting process and they impose serious obstacles to small companies wishing to compete in this area. In fact, however, several of the plans state explicitly that all that is required is that carriers make arrangements with another carrier that is able to provide international service.¹² This requirement is not unduly burdensome and recognizes the fact that callers from public telephones have not actually chosen the carrier that services the telephone and may be severely inconvenienced by

¹¹ FCC Presubscription Order, supra note 1, at ¶ 30.2, App. B, 933.

¹² See, e.g., Pacific Telesis Plan at 8; BellSouth Plan at 16-17. Other plans do not specify what type of international service is contemplated. NYNEX Plan at 4; Southwestern Bell Plan at 10.

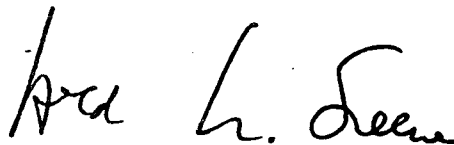
public telephones that cannot be used to complete international calls.

Accordingly, upon consideration of the plans filed by the Regional Companies, and the oppositions filed thereto, it is this 23rd day of December, 1988

ORDERED that the plans be and they are hereby approved subject to the following conditions and modifications:

- (1) the provisions in all of the plans regarding price caps are subject to possible future definition or modification by the FCC;
- (2) the requirement in BellSouth's plan that all transferred calls be rated from the origin of the call is deleted, and all plans will be subject to future FCC decisions regarding this issue;
- (3) the requirement in BellSouth's plan that a carrier be state certified to provide intrastate inter-LATA service before it can be included on the ballots is deleted;
- (4) the requirement in Pacific Telesis's Plan that a carrier have applied for state certification (a Certificate of Public Convenience and Necessity) to provide intrastate inter-LATA service prior to December 2, 1988, is deleted;

- (5) although state certification is not required of carriers participating in the presubscription process, no carrier may commence providing service from a presubscribed public telephone unless it has been state certified to provide intrastate inter-LATA service or has made arrangements to transfer such calls to a certified carrier. If a carrier has not made suitable arrangements to service intrastate inter-LATA traffic by the time of implementation of the program, the public telephone shall be allocated as provided in the Regional Company plans; and
- (6) a carrier's eligibility to service public telephones may not be conditioned on an ability to provide international service, but it may be conditioned on the existence of an arrangement to transfer international traffic to a carrier capable of providing such service.



HAROLD H. GREENE
United States District Judge

CARRIERS PARTICIPATING IN COIN PRESUBSCRIPTION IN MISSOURI

CIC 006 ALU	AMERICALL DIAL "0" SERVICES 1-800-999-0536
✓CIC 222 MCI	MCI "0+" Service For Pay Phone Information Call 1-800-444-9095
CIC 223 TDX	Cable & Wireless (TDX) 1-800-368-4729
✓CIC 288	AT&T 1-800 KEEP ATT (1-800-533-7288)
CIC 330 TSH	TEL-SHARE U.S. INC. -TRAVEL CALL- 1-800-288-9190
CIC 333 UTC	US SPRINT PUBLICFON SERVICE 1-800-347-2500 Box 15981 Shawnee Msn KS 66215
CIC 339 CAB	DIAL U.S. LONG DISTANCE "YOUR PROFIT SHARING PARTNER" CERTIFIED CARRIER 1-800-798-0115
CIC 488 ITT	ITT COMMUNICATIONS SERVICES 1-800-526-3000
CIC 540 AXL	AMERICAN LONG DISTANCE EXCHANGE SUPER COMMISSION PLAN 1-800-669-2647
CIC 555 TEN	TELESPHERE Oakbrook Terrace, Ill 60181 1-800-346-6329
CIC 658 NLT	National Telephone Services 1-800-365-0078
CIC 805 ITG	ITI 0+ REVENUE SHARING 1-800-888-2285
CIC 824 TRI	ATC Long Distance, Inc. 1-800-225-7778
CIC 835 TDD	Teleconnect Company Cedar Rapids, Iowa 1-800-728-7000
CIC 999 SNC	ITT OPERATOR SERVICES 1-800-231-7545

MCI

MCI Telecommunications
Corporation

Southwest Division
MCI Building
100 South Fourth Street
St. Louis, Missouri 63102
(314) 342-8900

RECEIVED

MAR 30 1989

March 27, 1989

**COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION**

Mr. Harvey G. Hubbs
Secretary
Missouri Public Service Commission
Truman State Office Building
301 West High Street
Jefferson City, Missouri 65102

Re: MCI Operator Services Tariff Filing--File No. 8900370

Dear Mr. Hubbs:

On March 2, 1989 MCI submitted the above-referenced tariff filing for the purpose of introducing Operator Services on an intrastate basis in Missouri. MCI's Operator Services tariff bears a requested effective date of April 6, 1989. MCI has been in contact with the Commission Staff concerning the status of this tariff filing, and understands that Staff intends to recommend suspension of MCI's Operator Services tariff pending resolution of MOPSC Case No. TA-88-218, et al., (the Commission's consolidated "AOS" docket). For the reasons set forth below, MCI believes suspension of its Operator Services tariff is unwarranted, and that such action would constitute unjust discrimination and would unnecessarily subject MCI to risk of commercial harm. MCI requests that this letter be placed in File No. 8900370 and asks the Commission to consider the arguments contained herein in conjunction with Staff's recommendation to suspend MCI's tariff.

At the outset, MCI notes as a matter of policy that it cannot properly be considered a specialized or "AOS" carrier; rather, MCI is a full-service interexchange carrier (IXC). Intrastate Operator Services would be an ancillary offering to MCI's other intrastate tariffed long-distance services. Operator Services is a necessary offering to permit MCI to compete as a full-service alternative to AT&T which, along with US Sprint, already has an approved intrastate Operator Services tariff.

MCI's proposed Operator Services tariff is substantively equivalent to the tariffs of AT&T and US Sprint and, to MCI's knowledge, Staff has no objection to the merits of MCI's Operator Services tariff or the cost information which MCI has provided in support thereof. It is MCI's understanding that Staff's recommendation for suspension will be based solely upon the pendency of Case No. TA-88-218, et al; thus, no rational basis exists for such preferential treatment of the tariffs of

Mr. Harvey G. Hubbs
Missouri Public Service Commission
March 27, 1989
Page 2

AT&T and US Sprint relative to that proposed by MCI. As a result, suspension of MCI's Operator Services tariff in these circumstances clearly would constitute unjust and unlawful discrimination.

Suspension of MCI's intrastate Operator Services tariff is also a matter of concern because of the significant commercial harm which MCI could experience in the course of the BOC public payphone conversion process. As the Commission may be aware, U.S. District Judge Harold Greene recently found the existing practice (by which all 0+ interLATA operator-assisted calls from BOC public payphones are carried by AT&T) is inconsistent with the MFJ's equal access requirements. As an interim remedy, Judge Greene ordered implementation of a system whereby premises owners at BOC public payphone locations will select presubscribed carriers for 0+ interLATA traffic. (United States v. Western Electric, et al., Civil Action No. 82-0192, issued October 14, 1988). Ballots have been sent to premises owners for this purpose and Southwestern Bell Telephone Company (SWBT) is scheduled to begin the conversion of its public payphones to presubscribed carriers on April 7, 1989. MCI's March 2 Operator Services tariff filing bore an April 6 requested effective date to coincide with SWBT's initial public payphone conversions. While IXCs like MCI are attempting to gain a share of the BOC public payphone market heretofore monopolized by AT&T, it is likely that failure to approve MCI's intrastate Operator Services tariff could be used as a marketing device by AT&T or other tariffed carriers to persuade potential customers not to select MCI. Thus, failure to approve MCI's Operator Services tariff could place MCI at a competitive disadvantage versus such carriers, and could result in significant commercial harm to MCI. Because no lawful basis exists for treating MCI's Operator Services tariff differently from the previously approved tariffs of AT&T and US Sprint, such commercial harm would directly result from unlawful and unjust regulatory discrimination.

Finally, MCI notes that the Commission has recently restricted the applications of two new entrants in the intrastate IXC market against the provision of Operator Services. In doing so, the Commission has characterized its Case No. TA-88-218, et al., investigation in a disturbing manner, by stating:

The instant application includes a request for authority to provide operator services. In Case No. TA-88-218 the Commission has under consideration the question of whether the provision of such services is in the public interest. We are of the opinion that, until there is a resolution of the issues in Case No. TA-88-218, no immediate action shall be taken on pending applications for authority to provide operator

Mr. Harvey G. Hubbs
Missouri Public Service Commission
March 27, 1989
Page 3

services. Therefore, any initial authority which may be granted in the instant case does not contemplate, and will not authorize, the filing of tariffs for, or the provision of, operator services.

In re: Telesphere Network, Inc., Case No. TA-89-164, Order and Notice and Denial of Request, issued March 7, 1989 at p. 2; and In re: AmeriCall Dial 0 Services, Inc., Case No. TA-89-153, Order and Notice, at p. 2.

Clearly, the question of whether the provision of operator services is in the public interest was answered in the affirmative long ago, inasmuch as AT&T and the LECs have provided this service for many years. Further, the Commission has also answered in the affirmative the question of whether competition in the provision of Operator Services by IXC's is in the public interest, through its approval of US Sprint's Operator Services tariff. Finally, with respect to BOC (and GTE) public payphones, Judge Greene has determined that the MFJ's equal access provisions dictate a dismantling of the AT&T 0+ interLATA monopoly.

For these reasons, MCI submits that its Operator Services tariff should be allowed to become effective April 6. Suspension of MCI's tariff would be unreasonable, unlawful and unjustly discriminatory, and would unnecessarily subject MCI to potential commercial harm. MCI therefore respectfully requests the Commission to permit MCI's Operator Services tariff to become effective on April 6, 1989.

Respectfully submitted,



Edward J. Cadieux
Regulatory Attorney

cc: C. K. Casteel, Jr.
Leland B. Curtis
Lou Pompei
Mary Ann Young, General Counsel, Missouri Public Service Commission
Brent Stewart, Assistant General Counsel, Missouri Public Service Commission
Samuel F. Goldammer, Manager Communications Department, Missouri Public Service Commission
Martha Hogerty, Public Counsel

EJC/bac/1268R



March 28, 1989

The Missouri Public Service Commission
PO BOX 360
Jefferson City, MO 65102

RECEIVED
MAR 31 1989

**RE: Allnet Communication Services, Inc
Operator Assistance Tariff Filing**

OFFICE OF THE SECRETARY
PUBLIC SERVICE COMMISSION

Honorable Commissioners:

On October 5, 1988, Allnet Communication Services, Inc. (Allnet) filed to introduce an additional option for its existing 1+ customers in Missouri. A copy of our initial filing is attached hereto. It has now been over 5 months since Allnet filed to introduce this new optional "00" operator assistance service for its existing 1+ customers. Allnet is gravely concerned that continued delay in approval of this service will result in customer attrition from Allnet to competing carriers -- such as AT&T -- who currently provide operator assistance.

Due to an apparent on-going proceeding regarding Alternative Operator Services (AOS), Allnet has, at the Commission's Staff (Staff) recommendation, voluntarily deferred the effective date of this filing numerous times. Staff has continually indicated that the Commission was near a conclusion in this investigation, and did not feel comfortable bringing before the Commission Allnet's filing until resolution of the investigation.

Allnet does not believe that this lengthy delay is warranted. Allnet is also concerned that its proposed optional "00" operator assistance service is being compared to an AOS service. In contrast to AOS providers, Allnet's operator assistance is only accessible by dialing "00" and requires that a customer be an existing presubscribed 1+ customer. Allnet does not propose to handle 0+, or 0- traffic. Existing Allnet customers who may desire to use an AT&T operator are instructed to hang up and dial 10288 + 0, and are not charged for this instruction. Lastly, Allnet does not contract with hotels, motels, or pay telephones nor does it pay commissions to these entities to encourage the routing of operator assisted traffic to Allnet.

Having concerns that the Staff may have been interpreting Allnet's intentions as proposing to offer services to the "transient public," we had discussions with Staff, which included the Public Counsel, in a conference call within the past month to discuss the filing. Allnet is not aware of any substantive reasons why there should be continued deferral of our filing.

File No. 8900162

Since these discussions, Allnet has been informed that the Staff is uncomfortable with presenting to the Commission its recommended approval of Allnet's "00" operator assistance service, despite Staff's lack of any substantive objections to the filing.

Allnet is aware of the Commission's policy goals regarding AOS providers, and the need to protect consumers -- especially in light of the FCC complaint regarding 5 AOS providers -- but wishes to indicate for the record that the "00" operator assistance service proposed to be provided by Allnet is not an AOS service, and that Allnet is not an AOS service provider. The public interest will not be served by continued denial of Allnet's request to provide intrastate operator assistance through a unique "00" dialing sequence to its existing presubscribed customer base.

In summary, Allnet respectfully requests that its tariff filing be permitted to become effective immediately. Allnet is not proposing to provide AOS services. Allnet is not offering operator service under contract or paying commissions to encourage routing of operator traffic from "traffic aggregators" who serve the "transient public." Allnet only wishes to provide a new option to its existing 1+ customer base who have requested this "00" service offering. Without Allnet "00" intrastate operator service, "00" calls placed by Allnet customers will be blocked causing existing 1+ customers to be inconvenienced. No purpose is served by denial of the new "00" routing option for Allnet's existing 1+ customers.

I look forward to a timely resolution of this issue, and should you wish to discuss this matter further, please feel free to contact me at (202) 293 - 0593.

Sincerely,



J. Scott Nicholls
Manager of Regulatory Affairs

cc: Brent Stewart ✓
Linda Ohlemeyer
Charlie Brown