FILED

BEFORE THE PUBLIC SERVICE COMMISSION

JUL 1 1 1988

OF THE STATE OF MISSOURI

PUBLIC SERVICE COMMISSION

In the matter of the application of American Operator Services, Inc. for a certificate of service authority to provide Intrastate Operator-Assisted Resold Case No. TA-88-218 Telecommunications Services. In the matter of Teleconnect Company for authority to file tariff sheets designed to establish Operator Case No. TR-88-282 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)
Services within its certificated)
service area in the State of Missouri.) Case No. TR-88-283 In the matter of Dial U.S.A. for authority to file tariffs sheets designed to establish Operator Case No. TR-88-284 Services within its certificated) service area in the State of Missouri.) Care No TA-88-12 In the matter of International Telecharge, Inc. for authority to file) File No. 8800148 tariff sheets designed to establish Operator Services within its certificated service area in the State of Missouri.

MOTION IN SUPPORT OF PUBLIC COUNSEL'S MOTION TO CONSOLIDATE

Comes now the Staff of the Missouri Public Service
Commission (Staff) and states that:

- 1. Staff agrees that the above-captioned cases present common questions of law and fact regarding the provision of Alternative Operator Services (A.O.S.) within the State of Missouri.
- Staff agrees that consolidation of the above-captioned cases would be preferable to the establishment of a generic A.O.S. docket and would aid the Commission in developing an A.O.S. policy.
- 3. Staff agrees that consolidation of the above-referenced cases would avoid repetitious cost and delays which would result if said cases proceeded on an individual basis.
- 4. Because Staff's investigation of A.O.S. has yet to be completed, Staff takes no position at this time as to the provision of A.O.S. in Missouri generally or as to any particular issue which might be presented in any or all of the above-captioned cases. With this caveat, Staff supports Public Counsel's Motion to Consolidate.

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WHEREFORE, Staff joins Public Counsel in moving to consolidate the above-captioned cases pursuant to 4 CSR 240-2.110(16) to the extent stated herein.

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 //th day of

Grander B