

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Introduction of Rate Plan)	Case No. TT-2008-_____
TTM800-2 by Intellicall Operator Services)	Tariff File No. JX-2008-0341
Inc. d/b/a ILD)	

MOTION TO SUSPEND

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. Intellicall Operator Services, Inc. d/b/a ILD is an alternative operator services company certificated by the Commission to provide intrastate interexchange telecommunications service.

2. On November 26, 2007, ILD issued an 8th Revised Sheet No. 1 and an Original Sheet No. 29.3 to its Telecommunications Services Tariff, Missouri P.S.C. No. 1. The revised sheets introduce Rate Plan TTM800-2. Usage is billed in 1 minute increments with an initial period of 5 minutes. The initial charge is \$5.75 and each additional minutes is \$1.15. The sheets bear a proposed effective date of December 26, 2007. The tariff sheets were assigned Tariff File No. JX-2008-0341. A copy of ILD's tariff sheets is attached hereto as required by Commission rule 4 CSR 240-2.065(3).

3. Section 392.515 RSMo provides, in pertinent part:

(1) Intrastate operator services provided by alternative operator service companies shall be provided pursuant to rates approved by the commission under the provisions of subsection 2 of section 392.220, provided that proposed rates shall be presumed reasonable by the commission and approved if they are no higher than operator services rates of certificated interexchange telecommunications companies which are not alternative operator services companies;

4. Certificated interexchange telecommunications companies which are not alternative operator services companies do charge \$1.15 per minute, however, they do not charge for an initial period of 5 minutes.

5. The Staff asserts that the initial charge of \$5.75 is not reasonable.

6. Section 392.230.2 RSMo authorizes the Commission to suspend and to enter upon a hearing concerning the propriety of this new charge.

7. The Staff discussed this matter with ILD's representative before filing this motion.

WHEREFORE, the Staff requests the Commission to suspend ILD's tariff filing and to enter upon a hearing concerning the propriety of the new charge; and after hearing, to reject the tariff sheets.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by mail, electronic mail or facsimile on December 19, 2007.

/s/ William K. Haas

Dennis Stoutenburgh,
President
Intellical Operator Services, Inc. d/b/a ILD
500 Sawgrass Village Circle, Suite 30
Ponte Vedra Beach, FL 32082

Caroline Pays
Nowalsky, Bronston, & Gothard
3500 North Causeway Boulevard Suite 1442
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Notary Public

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Monica Borne Haab
Philip R. Adams, Jr.

RECEIVED
November 26, 2007
Data Center
Missouri Public
Service Commission

November 21, 2007

Via Overnight Mail

Chief Clerk
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

RE: Intellicall Operator Services, Inc.
Revised tariff No. 1

Dear Sir or Madam:

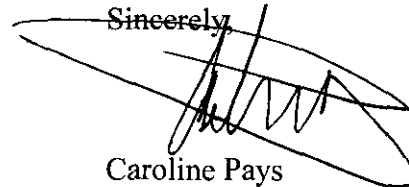
Enclosed please find an original and three (3) copies of the revised tariff for Intellicall Operator Services, Inc., d/b/a ILD. The revision is set forth as follows:

- 1) Check sheet, 8th Revised Sheet 2;
- 2) Added new rate plan, Section D.21, Original Sheet 29.3.

An additional copy of this letter has been enclosed to be date-stamped and returned in the envelope provided as evidence of the filing.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Caroline Pays

Enclosure

TELECOMMUNICATIONS SERVICES TARIFF

CHECK SHEET

Sheets 1 to 30, inclusive of this tariff are effective as of the date shown. Original and revised sheets, as named below, contain all changes from the original tariff that are in effect on the date thereon, except as otherwise noted

<u>Sheet No.</u>	<u>Revision #</u>	<u>Sheet No.</u>	<u>Revision #</u>
1	8 th Revised*		
2	1 st Revised		
3	1 st Revised		
4	1 st Revised		
5	1 st Revised		
6	1 st Revised		
7	1 st Revised		
8	1 st Revised		
9	1 st Revised		
10	1 st Revised		
11	1 st Revised		
12	1 st Revised		
13	1 st Revised		
14	1 st Revised		
15	1 st Revised		
15.1	Original		
15.2	Original		
16	1 st Revised		
17	1 st Revised		
18	1 st Revised		
19	1 st Revised		
20	1 st Revised		
21	2 nd Revised		
22	2 nd Revised		
23	2 nd Revised		
24	1 st Revised		
25	1 st Revised		
26	1 st Revised		
27	2 nd Revised		
28	2 nd Revised		
29	2 nd Revised		
29.1	Original		
29.2	Original		
29.3	Original*		
30	1 st Revised		
31	Original		

ISSUED: November 26, 2007 EFFECTIVE: December 27, 2007

INTELLICALL OPERATOR SERVICES, INC. D/B/A ILD
Dennis Stoutenburgh, President
5000 Sawgrass Village Circle, Suite 30
Ponte Vedra Beach, FL 32082

TELECOMMUNICATIONS SERVICES TARIFF

D.21 Rate Plan TTM800-2- IntraLATA/InterLATA

Billed in 1 minute increments with an initial period of 5 minutes. .

D.21.1 Usage Charges - Intra/InterLATA

<u>Mileage</u>	<u>Day</u> <u>5 Min.</u>	<u>Add'l Min.</u>	<u>Evening</u> <u>1st 5 Min.</u>	<u>Add'l Min.</u>	<u>Night/Weekend</u> <u>1st 5 Min.</u>	<u>Add'l Min.</u>
ALL	\$5.7500	\$1.1500	\$5.7500	\$1.1500	\$5.7500	\$1.1500

D.21.2 Service Charges - Intra/InterLATA

	<u>Person To</u> <u>Person</u>	<u>Automated</u>	<u>Operator</u> <u>Assisted</u>	Live
Calling Card	\$12.50	\$4.99	\$7.50	\$7.50
Credit Card	\$12.50	\$4.99	\$7.50	\$7.50
Collect	\$12.50		\$5.99	\$7.50
3 rd Party	\$12.50		\$6.99	\$9.99

ISSUED: November 26, 2007

EFFECTIVE: December 26, 2007

INTELLICALL OPERATOR SERVICES, INC.d/b/a ILD
Dennis Stoutenburgh, President
5000 Sawgrass Village Circle, Suite 30
Ponte Vedra Beach, FL 32082