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General Counsel

July 11, 1988

FILED

JUL 11 1988

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.

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

Case No. TR-88-284 - In the matter of Dial U.S.A. for authority to file tariff sheets designed to establish Operator Services within its certificated service area in the State of Missouri.

File No. 8800148 - In the matter of International Telecharge, Inc. for authority to file tariff sheets designed to establish Operator Services within its certificated service area in the State of Missouri.

Dear Mr. Hubbs:

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

Mr. Harvey G. Hubbs  
July 11, 1988  
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Thank you for your assistance in this matter.

Sincerely,

*Charles Brent Stewart mh*

Charles Brent Stewart  
Assistant General Counsel

CBS:nsh

Enclosures

cc: All parties of record

# FILED

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

JUL 11 1988

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 )  
Telecommunications Services. )

Case No. TA-88-218 ✓

In the matter of Teleconnect Company )  
for authority to file tariff sheets )  
designed to establish Operator )  
Services within its certificated )  
service area in the State of Missouri.)

Case No. TR-88-282

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 )  
Services within its certificated )  
service area in the State of Missouri.)

Case No. TR-88-284

In the matter of International )  
Telecharge, Inc. for authority to file) )  
tariff sheets designed to establish )  
Operator Services within its )  
certificated service area in the )  
State of Missouri. )

Case No TA-88-12  
File No. 8800148

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.

2. 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.

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 11<sup>th</sup> day of JULY, 1958.

  
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