

Exhibit No.:
Witness/Type of Exhibit: Drainer/Direct
Sponsoring Party: Public Counsel
Company: American Operator
Services, Inc.
Case No.: TA-88-218, et al.

DIRECT TESTIMONY
OF
M. DIANNE DRAINER

Submitted On Behalf Of
Office Of The Public Counsel

AMERICAN OPERATOR SERVICES, INC.
Case No. TA-88-218, et al.

August 1988

Exhibit No. 12
Date 9-20-88 Case No. TA-88-218 et al
Reporter Tweedy

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

| | | |
|-------------------------------------|---|----------------------------|
| In the matter of the application |) | |
| of American Operator Services, Inc. |) | |
| for a certificate of service |) | Case No. TA-88-218, et al. |
| authority to provide intrastate |) | |
| operator assisted resold |) | |
| telecommunications services. |) | |

AFFIDAVIT OF M. DIANNE DRAINER

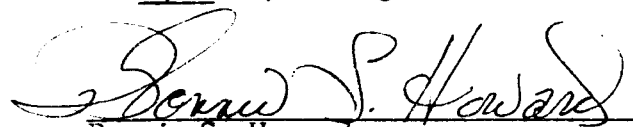
STATE OF MISSOURI)
) SS
COUNTY OF COLE)

M. Dianne Drainer, of lawful age, being first duly sworn, deposes and states:

1. My name is M. Dianne Drainer. I am a Public Utility Economist for the Office of the Public Counsel.
2. Attached hereto and made part hereof for all purposes is my direct testimony consisting of pages 1 through 13 and Schedules 1 through 4.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


M. Dianne Drainer

Subscribed and sworn to before me this 19th day of August, 1988.


Bonnie S. Howard
Notary Public

My commission expires May 3, 1989.

AMERICAN OPERATOR SERVICES, INC.

Case No. TA-88-218, et al.

DIRECT TESTIMONY OF
M. DIANNE DRAINER

Q. Please state your name and business address.

A. My name is M. Dianne Drainer. My address is P.O. Box 7800, Jefferson City, Missouri 65102.

Q. What is your occupation?

A. I am employed by the Missouri Office of the Public Counsel (Public Counsel) as a Public Utility Economist specializing in telecommunication issues.

Q. How long have you been employed by Public Counsel?

A. I have been with Public Counsel since June, 1986.

Q. Have you previously testified before the Public Service Commission?

A. Yes, I have testified on behalf of Public Counsel in the following cases: Grand River Mutual Telephone Corporation, Case No. TR-87-25; General Telephone Company of the Midwest, Case No. TC-87-57; United Telephone Company, Case No. TR-87-11; United Telephone Long Distance Company of the Midwest, Case No. TA-89-91; and Classification of Services Provided by IXCs, Case No. TO-88-142.

Q. What professional organizations and associations are you currently a member of?

A. I was appointed an observer to the Staff Subcommittee on Communications for the National Association of Regulatory Utility Commissioners (NARUC) in April, 1987. I am also a member of the NARUC AOS Task Force which was formed in March of this year to investigate the AOS industry and its impact on the states. I am a member of the American Economic Association, and the Western Economic Association.

Q. Please describe your education and employment background.

A. I have a Bachelor of Arts degree in Economics, 1977, and a Master of Arts degree in Agricultural Economics, 1979, with a Microeconomic and Production Theory emphasis from the University of Missouri-Columbia. I have completed several post-graduate courses toward a doctorate in Economics with further emphasis in Macroeconomic and Microeconomic Theories.

From 1980 to 1983, I held the position of Senior Market Researcher for MFA, Incorporated, a Missouri agricultural cooperative. From 1984-1986 period, I was employed as the Economist for the Business Department of Columbia College in Columbia, Missouri. In that capacity I taught courses in Principles of Microeconomics and Macroeconomics, Money and Banking, and Market Research. I represented the college as visiting professor to Bradford University, Bradford, England, summer semester of 1985, where I taught Economic History.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to present Public Counsel's recommendation to the Commission with respect to the following alternative operator services (AOS) providers: (1) American Operator Services, Inc.

(AOSI) application for a certificate of service authority to provide intrastate operator-assisted resold telecommunications service; and (2) Teleconnect Company, Dial U.S., Dial U.S.A., and International Telecharge, Inc. (ITI) request for authority to file tariff sheets designed to establish operator services within the State of Missouri.

Q. Please briefly describe AOS for the Commission.

A. AOS providers, such as American Operator Services, Inc. and ITI, provide their operator services primarily to COCOT payphones, hotels, motels, hospitals, universities, and truck stops. These are the types of institutions and businesses with which the AOS providers enter into contracts. These contracts usually result in excessive rates to the captive end user through the use of surcharges being added to the tariffed rates. These services are offered to businesses as an alternative to the operator service (i.e., credit card, collect, third party billing, etc.) provided by the traditional carriers.

Q. What are Public Counsel's recommendations with regard to allowing AOS providers to be certificated in the State of Missouri?

A. Public Counsel's recommendations are as follows:

First, Public Counsel recommends that American Operator Services, Inc., ITI, Teleconnect Company, Dial U.S., and Dial U.S.A. not be certificated to provide AOS in the State of Missouri. Furthermore, Public Counsel recommends that the Commission deny future applications of certification of any AOS providers in the State of Missouri and reject all future proposed AOS tariffs filed by resellers.

Second, if the Commission authorizes the provision of AOS in the State of Missouri, Public Counsel recommends that the Commission set up a certification procedure specifically for AOS and that the Commission adopt at a bare minimum the conditions described in this testimony.

Third, Public Counsel recommends that the Commission take legal action to ensure that AOS providers cease operations immediately in the State of Missouri.

Fourth, Public Counsel recommends that the Commission direct all LECs who have billing and collection (B/C) contracts with AOS providers to discontinue B/C for all unauthorized AOS calls.

Q. Would you please explain why AOS providers should not be allowed to operate in the State of Missouri?

A. Yes. At the current time the AOS providers have created numerous concerns and problems for Missouri end users and for end users in other states that must be addressed before any consideration is given to certifying their services in Missouri. At the present time, it is Public Counsel's position that AOS providers are not in the public interest and that they are indeed a negative force in the telecommunication environment for end users.

Q. To what extent has Public Counsel been made aware of these concerns and problems created by the AOS providers?

A. In March of this year, I became a member of the AOS Task Force for the National Association of Regulatory Utility Commissioners (NARUC) Staff Subcommittee on Telecommunications. As a member of this task force I worked with Paul Pederson, Missouri PSC, Howard Bradshaw,

Michigan PSC, Diane Hockman, Ohio PSC, and Sam Loudenslager, Arkansas PSC, in an investigation to provide information and make recommendations with respect to the emergence of AOS providers. To accomplish this goal, the task force sent out a questionnaire to all state regulatory commissions, the Federal Communications Commission (FCC), state consumer counsels, state telephone associations, and the AOS providers. In the process of building the data base from the fifty (50) state regulatory agencies (PUCs), District of Columbia, the FCC, and the twenty-two (22) nonregulatory agencies' responses, it became abundantly clear that there were numerous concerns and problems regarding AOS that needed to be addressed in order to protect the public interest.

Q. Would you please explain why AOS is not in the public interest?

A. AOS is not in the public interest for a number of reasons, including the following six reasons:

First, end users have experienced excessively high toll rates and surcharges associated with using AOS providers.

Second, end users have stated that they were not given adequate notification by the operator that they were using an AOS provider.

Third, end users have been denied access to the long distance carrier of their choice by AOS providers.

Fourth, emergency calls have not been routed by AOS providers in the fastest possible manner to the proper local emergency service provider.

Fifth, end users' telephone service can be disconnected by the local exchange company (LEC) should the AOS provider have a billing and

collection contract with the LEC and disconnect is part of that agreement for nonpayment of the AOS charges.

Sixth, end users have been charged for incomplete calls and unanswered calls by the AOS providers.

Q. Would you please expound on each of the concerns listed above?

A. Yes. First, with respect to excessively high toll rates and surcharges, all of the states (100%) reporting complaints by the end users listed excessive rates. Similar complaints have been received by LECs in Missouri, copies of which are in Schedules 1* and 2*. It is Public Counsel's position that because the end user is a captive customer of the AOS provider, it is not in the public interest to allow AOS providers to operate in the State of Missouri and charge unsuspecting end users excessive rates.

Second, end users have stated that they were not given adequate notification by the operator that they were using an AOS provider. This is a frequent complaint by end users who believed that when they used their traditional operator credit card that their traditional carrier would be charging them until they received their monthly telephone bill and surprisingly found an AOS provider's excessive charges. Often the end user responds that he/she did not have any knowledge that an AOS provider was involved in his/her transaction. It is Public Counsel's position that it is not in the public interest to have end users unknowingly

*Schedule 1 and 2 contain proprietary information.

exposed to a new service company without the proper notification procedure by the new service company.

Third, end users have been denied access to the long distance carrier of their choice by AOS providers in two distinct ways. First, end users have stated that they requested the interexchange carrier (IXC) of their choice but that the AOS operator did not comply. This procedure of turning the call over to another carrier upon request is referred to as "splashback". Second, when end users originally requested their IXCs' credit cards, they made that choice assuming they would have access to that carrier in the future. However, AOS providers are now denying them this access. Instead, the AOS providers are misrepresenting themselves to the end users by accepting another company's credit card, thereby undermining the purpose of selecting an individual company's credit card in the first place. It is Public Counsel's position that it is not in the public interest to have the end user a captive customer of a service and company when they expressly have requested another carrier.

Fourth, there are serious questions as to whether AOS operators can route emergency calls in the fastest manner possible to the proper local emergency service provider. In the area of routing emergency calls there can be no second guessing as to where the call is originating or lengthy re-routing procedures. It is Public Counsel's position that until this can be reviewed further it is not in the public interest to have AOS providers operating in the State of Missouri.

Fifth, end users' telephone service can be disconnected by the LEC for nonpayment of excessive AOS charges. AOS providers establish billing and collection agreements with LECs. One such contract by SWB indicates that they will disconnect local service for nonpayment of an AOS bill. A

copy of this section of a standard SWB B/C contract of December 1, 1987 is contained in Schedule 4. It is the position of Public Counsel that local service should not be disconnected due to nonpayment of an AOS charge especially considering the many rate disputes end users have with these type of services and companies.

Sixth, it is a practice of a number of AOS providers to charge end users for incomplete and unanswered calls. End users have historically not been charged by the traditional carrier for calls that are incomplete and unanswered. Therefore, when an end user is allowing the telephone to ring at the other end, he/she is not aware that the call is already being measured and will accumulate charges. It is Public Counsel's position that the end user should not be charged under any circumstances for these incomplete calls.

Q. Have you personally encountered any problems with AOS providers?

A. Yes. I have had two problems that related directly to AOS. First, while staying in a hotel in St. Louis in June, 1988, I encountered an AOS operator who did not voluntarily inform me that I was using an AOS provider and who refused to splashback my call over to the traditional carrier upon request.

Second, I received AOS charges on my monthly telephone bill for incomplete calls. Although the billing dispute was resolved in my favor, I did encounter the time consuming problem of dealing with both the AOS provider and my LEC in order to resolve those differences.

Q. What main points would you like to make in regard to your own personal experience with the AOS industry?

A. Having worked in great detail with the AOS Task Force and having been extensively involved in telecommunications issues, I have more knowledge and information at my disposal relating to current telecommunications issues than the average consumer. And yet, I, too, experienced a great deal of frustration and confusion in dealing with AOS problems. Also, I not only have experienced excessive rates for incomplete calls, the lack of operator notification, billing problems, and denial of "splashback", but it was extremely time consuming for me to protect my interest. Moreover, if I have problems with AOS, it is ludicrous to expect the average end user to follow and understand these abuses and frustrations.

Q. Other than the general concerns discussed above, are there any other reasons that you believe that Commission authorization of AOS is contrary to the public interest?

A. Yes. Since the inception of AOS, the AOS providers have flagrantly disregarded the Commission's authority to regulate the service provision and the rates for such service charged to Missouri consumers. As illustrated by the information contained in Schedules 1*, 2* and 3*, AOS is currently being provided in this state for intrastate calls. However, not one AOS provider has valid AOS tariffs on file with the Commission. Therefore, the provision of AOS is clearly illegal. This

*Schedule 1, 2 and 3 contain proprietary information.

blatant disregard for the Commission's authority, coupled with the AOS providers complete disregard of their end users, demonstrates conclusively that the provision of AOS is not in the public interest.

Q. What is Public Counsel's recommendation with respect to the unauthorized provision of AOS?

A. Public Counsel recommends that the Commission take legal action to ensure that AOS providers cease operations immediately in the State of Missouri. Furthermore, Public Counsel recommends that the Commission direct all LECs who have B/C contracts with AOS providers to discontinue B/C for all unauthorized AOS calls.

Q. Based on the numerous concerns and problems created by the AOS providers, what is Public Counsel's recommendation with respect to all AOS providers in the State of Missouri?

A. Public Counsel recommends that the Commission deny the certification of any AOS providers in the State of Missouri at this time and reject all tariffs filed by resellers to provide AOS.

Q. If the Commission authorizes the provision of AOS contrary to Public Counsel's recommendation, what conditions must be placed on this authority?

A. The certification procedure currently used by the PSC for resellers is not adequate for AOS providers. Due to the extent of the concerns created by the AOS industry, Public Counsel would ask the Commission to set up an AOS certification process that, at a bare minimum, would require the following seven conditions.

First, as a condition of certification, the AOS provider must submit proof of Articles of Incorporation, show financial ability to support proposed service offerings, show technical ability to support proposed service offerings, describe type of service and file tariffs on rates of services to be provided.

Second, as a condition of certification, the AOS provider must route all emergency zero minus (0-) calls in the quickest possible way to the proper local emergency service provider.

Third, as a condition of certification, the AOS provider must file tariffs on rates of services to be provided which are deemed just and reasonable.

Fourth, as a condition of certification, the AOS provider and/or business subscriber (i.e., COCOT payphones, hotel, motel, hospitals, universities, etc.) must be limited to only billing the end user the duly authorized tariffed rates.

Fifth, as a condition of certification, the AOS provider must: (A) post and display in prominent fashion the name of the AOS provider and detailed complaint procedures; (B) pre-announce to the end user the name of the provider handling the call; (C) upon request verbally quote rates charged to the end user; and (D) post and display instructions that inform the end user how to reach the local exchange operator and authorized interexchange carriers.

Sixth, as a condition of certification, the AOS provider must provide toll free access to all other authorized interexchange or local exchange carriers in a manner which provides end users with a local billing point.

Seventh, as a condition of certification, the AOS provider must guarantee the Commission that it will not charge end users for incomplete calls.

Q. Are the above suggestions all inclusive?

A. No. The above conditions are primarily based on the NARUC recommended guidelines for AOS, and these conditions should be considered the bare minimum requirements that the AOS providers must meet in order to operate in the State of Missouri.

Q. Would you please summarize Public Counsel's recommendation with respect to the AOS operators and services involved in this consolidated docket?

A. First, Public Counsel recommends that American Operator Services, Inc., ITI, Teleconnect Company, Dial U.S., and Dial U.S.A. not be certificated to provide AOS in the State of Missouri. Furthermore, Public Counsel recommends that the Commission deny future applications of certification of any AOS providers in the State of Missouri and reject all future proposed AOS tariffs filed by resellers.

Second, if the Commission authorized the provision of AOS in the State of Missouri, Public Counsel recommends that the Commission set up a certification procedure specifically for AOS and that the Commission adopt at a bare minimum the conditions expressed above by Public Counsel.

Third, Public Counsel recommends that the Commission take legal action to ensure that AOS providers cease operations immediately in the State of Missouri.

Fourth, Public Counsel recommends that the Commission direct all LECs who have B/C contracts with AOS providers to discontinue B/C for all unauthorized AOS calls.

Q. Does this conclude your testimony?

A. Yes, thank you.

Customer Name _____
 Telephone Number (NPA) (314) _____
 Name of Carrier _____
 Nature of Complaint TIMING UPDNGS, UNTIMELY BILLING,
RATES TOO HIGH, UNAWARE ACCESSING THOSE NETWORK
 Disposition 1 ANGRY, UPSET
 Name of Service Representative CANDY INTAGLIALITA
 Copy of call _____

MSG
MAY 25 88 *BILL 925 FCD
DETAIL OF CHARGES 1FR AG 7 MGR
AMOUNT U.S. TAX ST/LOC TAX TOTAL
62.81 1.58 2.58 67.2

CURRENT _____

IDENTIFIED CALLS

| ALJ NO | DATE | TIME | PLACE CALLED | AREA NUMBER | MIN | AMOUNT | TCCSY |
|--------|-------|---------|----------------------------|-------------|-----|--------|-------|
| 1 | 12 22 | 348PM | GRAVOIS MI MO | 314 | 5 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.88# | |
| 2 | 12 22 | 924PM | HOLLIN MO | 816 | 7 | | 2 85 |
| | | | 3RL NO. FROM KANSASCITY MO | 816 | | 4.75# | |
| 3 | 12 21 | 759PM | HOLLIN MO | 816 | 7 | | 2 85 |
| | | | 3RL NO. FROM KANSASCITY MO | 816 | | 4.75# | |
| A22 | 12 27 | 527PM | WARRENSBG MO | 816 | 8 | | 2 85 |
| | | | 3RL NO. FROM KANSASCITY MO | 816 | | 6.12# | |
| 5 | 12 27 | 612PM | GRAVOIS MI MO | 314 | 3 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 3.75# | |
| A22 | 6 11 | 3 626PM | GRAVOIS MI MO | 314 | 7 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.75# | |

MSG
MAY 25 88 *BILL 925 FCD
DETAIL OF CHARGES 1FR AG 3 MGR
AMOUNT U.S. TAX ST/LOC TAX TOTAL
50.2#

CURRENT _____

IDENTIFIED CALLS

| ALJ NO | DATE | TIME | PLACE CALLED | AREA NUMBER | MIN | AMOUNT | TCCSY |
|--------|-------|----------|----------------------------|-------------|-----|--------|-------|
| A22 | 7 11 | 4 829PM | GRAVOIS MI MO | 314 | 4 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.82# | |
| 8 | 11 10 | 547PM | GRAVOIS MI MO | 314 | 3 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.17# | |
| A22 | 9 11 | 10 539PM | LIE ASST KS | 816 | 2 | | 2 82 |
| | | | 3RL NO. FROM KANSASCITY MO | 816 | | 3.02 | |
| A22 | 10 11 | 12 641PM | PERRY KS | 812 | 8 | | 2 82 |
| | | | 3RL NO. FROM KANSASCITY MO | 816 | | 5.02 | |
| 11 | 11 11 | 724PM | GRAVOIS MI MO | 314 | 4 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.82# | |
| 12 | 11 17 | 526PM | GRAVOIS MI MO | 314 | 3 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.17# | |
| 13 | 11 18 | 1221PM | GRAVOIS MI MO | 314 | 3 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.25# | |
| 14 | 11 24 | 312PM | GRAVOIS MI MO | 314 | 5 | | 4 82 |
| | | | COLLECT FROM KANSASCITY MO | 816 | | 4.95# | |



Customer Name _____
 Telephone Number (NPA) _____
 Name of Carrier _____
 Nature of Complaint TIMING WRONG, UNTIMELY BILLING,
RATES TOO HIGH, UNAWARE ACCESSING DAN NETWORK.
 Disposition ANGRY, UPSET.
 Name of Service Representative SANDY INTAGLIATA
 Copy of call



MSG
 MAY 25 88 *BILL 625 OAN
 DETAIL OF CHARGES 1FR

AG 3 MGN
 AMOUNT U.S. TAX ST/ICC TAX
 139.83 4.20 5.66
 PAGE 1/1
 SCRL
 TOL
 149

| ADJ | NO | DATE | TIME | PLACE CALLED | AREA | NUMBER | MIN | AMOUNT | TOL | ST/ICC TAX |
|-----|----|------|-------|----------------------------|------|------------|-----|--------|-----|------------|
| 1 | 12 | 8 | 528PM | GRAVOIS MI MO | 314 | [REDACTED] | 5 | | | |
| | | | | COLLECT FROM KANSASCITY MO | 816 | [REDACTED] | | 4.25# | | |
| 2 | 12 | 15 | 611PM | GRAVOIS MI MO | 314 | [REDACTED] | 4 | | | |
| | | | | COLLECT FROM KANSASCITY MO | 816 | [REDACTED] | | 4.00# | | |
| 3 | 12 | 15 | 618PM | PAULINE KS | 913 | [REDACTED] | 12 | | | |
| | | | | 3RI NO. FROM KANSASCITY MO | 816 | [REDACTED] | | 6.00 | | |
| 4 | 12 | 22 | 424PM | GRAVOIS MI MO | 314 | [REDACTED] | 6 | | | |
| | | | | COLLECT FROM KANSASCITY MO | 816 | [REDACTED] | | 5.34# | | |
| 5 | 12 | 23 | 422PM | GRAVOIS MI MO | 314 | [REDACTED] | 3 | | | |
| | | | | COLLECT FROM KANSASCITY MO | 816 | [REDACTED] | | 4.17# | | |
| 6 | 12 | 29 | 729PM | CDESSA MO | 816 | [REDACTED] | 6 | | | |
| | | | | 3RI NO. FROM KANSASCITY MO | 816 | [REDACTED] | | 5.00# | | |

DRAINER DIRECT
TA-88-218, et al.

Customer Name [REDACTED]

Telephone Number (NPA) [REDACTED]

Name of Carrier [REDACTED]

Nature of Complaint CREDIT CARDS CALL (AT&T)
BILLED TO ITC W/O CUSTOMER'S KNOWLEDGE

Disposition SUSTAINED

Name of Service Representative See MARKS

Copy of call

JUN 27 98 *BILL 825 ITC
DETAIL OF CHARGES 1F1

PAGE 37
SCHW 1
TOTAL 24.96

| CURRENT | AMOUNT | U.S. TAX | ST/LOC TAX | TOTAL | | | |
|-----------------|--------|----------|----------------------------|-------------|-----|---------------|-------|
| 22.96 | .69 | 1.42 | 24.96 | | | | |
| OPTIMIZED CALLS | | | | | | | |
| ACC NO | DATE | TIME | PLACE CALLED | AREA NUMBER | MIN | AMOUNT | TCSLX |
| 1 | 6 11 | 1237PM | LACLEIF MO | 816 | 5 | | 3 85 |
| | | | CR CARD FROM WARRENSBUR MO | 816 | | 5.98# | |
| 2 | 6 12 | 846PM | LACLEDE MO | 816 | 3 | | 3 85 |
| | | | CR CARD FROM WARRENSBUR MO | 816 | | 3.78# | |
| 3 | 6 12 | 847PM | LACLEDE MO | 816 | 3 | | 3 25 |
| | | | CR CARD FROM WARRENSBUR MO | 816 | | 3.78# | |
| 4 | 6 12 | 853PM | LACLEDE MO | 816 | 6 | | 3 85 |
| | | | CR CARD FROM WARRENSBUR MO | 816 | | 5.29# | |
| 5 | 6 12 | 1041PM | LACLEDE MO | 816 | 4 | | - -- |
| | | | CR CARD FROM WARRENSBUR MO | 816 | | 4.22# | |
| | | | | | | 22.85 | |
| | | | | | | INCLUDING TAX | |

DRAINER DIRECT
TA-88-218, et al.

Customer Name _____
Telephone Number (NPA) _____
Name of Carrier _____
Nature of Complaint Customer was never
at the listed telephone #
Disposition adjusted 5.75
Name of Service Representative Kim M Lauchli
Copy of call

MAY 25 9 41 AM '88
DETAIL OF CHARGES
NO. OF CALLS 100
U.S. TAX SEIZED TAX 1.41
TOTAL 1.41
CALLS 100
1.87
1.87

00000000
00000000
00000000

1-800-722-7222 FREE

DRAINER DIRECT
TA-88-218, et al.

JUN 11 88 *BILL 825 110
DETAIL OF CHARGES 1F#

AG 1 FVS
AMOUNT U.S. TAX ST. LOC TAX
31.23 .84 1.79

PAGE 1
80
10
30

CURRENT

ITEMIZED CALLS

| ALJ NO | DATE | TIME | PLACE CALLED | AREA | NUMBER | MIN | AMOUNT | TOTAL |
|--------|------|--------------|--------------|------|--------|-----|--------|-------|
| 1 | 5 17 | 620PM | PARKVILLE | MO | 816 | 2 | 3.36# | 3 82 |
| | | CR CARD FROM | FENTON | MO | 314 | | | |
| 2 | 5 17 | 623PM | PARKVILLE | MO | 816 | 3 | 3.69# | 3 82 |
| | | CR CARD FROM | FENTON | MO | 314 | | | |
| 3 | 5 17 | 636PM | PARKVILLE | MO | 816 | 2 | 3.36# | 3 82 |
| | | CR CARD FROM | FENTON | MO | 314 | | | |
| 4 | 5 17 | 646PM | PARKVILLE | MO | 816 | 3 | 3.69# | 3 82 |
| | | CR CARD FROM | FENTON | MO | 314 | | | |
| 5 | 5 17 | 650PM | PARKVILLE | MO | 816 | 2 | 3.36# | 3 82 |
| | | CR CARD FROM | FENTON | MO | 314 | | | |
| 6 | 5 17 | 711PM | PARKVILLE | MO | 816 | 3 | 3.69# | 3 82 |
| | | CR CARD FROM | FENTON | MO | 314 | | | |

[REDACTED]

Customer Name [REDACTED]

Telephone Number (NPA) [REDACTED]

Name of Carrier [REDACTED]

Nature of Complaint excessive rate, feels twice as high and upset, wasn't advised different company.

Disposition Explained lease of long distance lines and advised operator which company they are.

Name of Service Representative P. SCHARNHORST

Copy of call

MSG
 PAY TO THE ORDER OF #BILL 628 110
 DETAIL OF CHARGES 180 AS 3 000 PAGE 1
 AMOUNT U.S. TAX SERV/100 TAX TOTAL
 6.98 .31 7.10

CURRENT [REDACTED]

IDENTIFIED CALLS

| ALL NO | DATE | TIME | PLACE CALLED | AREA | NUMBER | MIN | AMOUNT | TOLER |
|---|------|-------|--------------------------|------|------------|-----|--------|-------|
| 1 | 4 12 | 923PM | HARVESTERS NC | 314 | [REDACTED] | 3 | | 3 02 |
| | | | OR CALL FROM SARASOTA FL | 813 | [REDACTED] | | 2.50 | |
| 2 | 4 12 | 925PM | HARVESTERS NC | 314 | [REDACTED] | 5 | | 3 02 |
| | | | OR CALL FROM SARASOTA FL | 813 | [REDACTED] | | 4.45 | |
| [REDACTED] IDENTIFIED CALLS EXCLUDING TAX | | | | | | | 6.95 | |

FILED INQUIRIES 1-572-7441 FPET

Customer Name _____

Telephone Number (NPA) _____

Name of Carrier _____

Nature of Complaint SON MADE FR DCLM @ COLLEGE - WASN'T

NOTIFIED USING AVO CD - USED ATT CARD (IS ALSO ATEMP)

Disposition EXPI - MR OR

Name of Service Representative J. SOMERS

Copy of call _____

| DATE | TIME | PLANT | CHARGE | NO. | MIN | AMOUNT | TOLLY |
|---------------------------------|------|-------|-------------|-----|-----|--------|-------|
| 1 | 02 | 0888 | INTL. JAPAN | NO | 2 | | 7 82 |
| 0 | 02 | 0888 | INTL. JAPAN | NO | 18 | 3.25 | 3 32 |
| 0 | 02 | 0888 | INTL. JAPAN | NO | 2 | 0.71 | 7 82 |
| 1 | 01 | 0888 | INTL. JAPAN | NO | 11 | 3.33 | 3 82 |
| 0 | 02 | 0888 | INTL. JAPAN | NO | | 5.55 | |
| INTERMED. CHARGES EXCLUDING TAX | | | | | | 16.72 | |

TELEPHONE INQUIRIES 1-800-222-2222

DRAINER DIRECT
TA-88-218, et al.

Customer Name

Telephone Number (NPA)

Name of Carrier

Nature of Complaint AMOUNT TOO HIGH &
TOOK TOO LONG TO GET & WASNT ADVISED

BLFORE
HAND

Disposition CUST ACCEPTED CALL

Name of Service Representative P. HACKWORTH

Copy of call

MSG
MAY 28 89 WILL 528 128
DETAIL OF CHARGES 154 AG F CVC PAGE 1
AMOUNT U.S. DAY SERVICE TAX SCH 1
CURRENT INT'L TELEPHONE CHARGES 4.56 .14 TOTAL 4.70

| DATE | TIME | PLACE CALLED | AREA | NUMBER | MIN | AMOUNT | TOLLY |
|------|------|---------------------------|------|------------|-----|--------|-------|
| 1 | 3 22 | 729PM ST LOUIS MO | 314 | [REDACTED] | 5 | 4.56 | 3 J2 |
| | | CH CARD FROM ARLINGTON VA | 727 | [REDACTED] | | | |

ADMITTED CALLS EXCLUDING TAX 4.56

CALLING INQUIRIES 1-872-2820 FREE

Customer Name _____

Telephone Number (NPA) _____

Name of Carrier _____

Nature of Complaint *Ms ci upset said using calling card*

thought calls would be billed by Atx, had no idea

Disposition *explained calls, ms wil pay*

Satisfied

Name of Service Representative *G. Robinson*

Copy of call ..

*Why [redacted] was billing her calls?
Why calls so high.*

DRAINER DIRECT
TA-88-218, et al.

MAY 17 89 *BILL 925 ITG
DETAIL OF CHARGES 1FR

PAGE
SCH

AG 3 STJ
AMOUNT U.S. TAX ST ICC TAX
26.18 .70 1.66

| CHRGNT | CHARGE | AMOUNT | U.S. TAX | ST | ICC TAX | TOTAL |
|--------|--------------------------|--------|----------|----|---------|-------|
| 1 | 3 24 425PM ST JOSEPH MO | 3.74# | | | | 3 82 |
| 2 | 3 24 448PM PLATTSEURG MO | 3.74# | | | | 3 82 |
| 3 | 3 24 452PM PLATTSEURG MO | 3.74# | | | | 3 82 |
| 4 | 3 25 636PM PLATTSEURG MO | 3.74# | | | | 3 82 |
| 5 | 3 25 642PM ST JOSEPH MO | 3.74# | | | | 3 82 |
| 6 | 3 25 644PM ST JOSEPH MO | 3.74# | | | | 3 82 |

DRAINER DIRECT
TA-88-218, et al.

Customer Name _____
Telephone Number (NPA) _____
Name of Carrier _____
Nature of Complaint cust claims no knowledge of call
Disposition issued adjustment
Name of Service Representative G. Bratherton
Copy of call

MSJ
MAY 15 88 *BILL 008 V01
DETAIL OF CHARGES

| CURRENT | CHARGES | AMOUNT | AG | CPG | U.S. TAX | ST/LOC TAX | SCR. | TOTAL |
|---------|-----------------|------------|--------------|------|------------|------------|--------|-------------------------------|
| | ITL MIZED CALLS | 3.52 | | | .11 | .21 | | 3.84 |
| ADJ NO | DATE | TIME | PLACE CALLED | AREA | NUMBER | MIN | AMOUNT | TCSLA |
| AK2 1 | 3 24 | 929AM | ST LOUIS | 314 | [REDACTED] | 1 | | 2.25 |
| | 3RD NO. FROM | CAPIEIRARD | | 314 | [REDACTED] | | 3.52 | |
| | | | | | | | | ITL MIZED CALLS EXCLUDING TAX |
| | | | | | | | | 3.73 |

BIDDING INQUIRIES 1-820-288-2626

DRAINER DIRECT
TA-88-218, et al.

SCHEDULE 2 CONTAINS
PROPRIETARY INFORMATION.

DRAINER DIRECT
TA-88-218, et al.

SCHEDULE 3 CONTAINS
PROPRIETARY INFORMATION.

BILLING AND COLLECTION SERVICES
REQUIREMENTS

| | |
|-------------------|------------------------|
| Section | 2.0 |
| Section Title | LDS Functional Service |
| Sub Section | 2.10 |
| Sub Section Title | Denial of Service |

- 2.10.1. SWBT will provide denial of service, restricting end user access to the network, in cases of insufficient payment.
- 2.10.2. The Denial of Service provision provided by SWBT will provide for the disconnection of the customer's local exchange service. Denial of Service will be the result of nonpayment of total charges due.
- 2.10.3. SWBT will determine the necessity for denying customer access by a SWBT procedure consistent with regulatory requirements. For those IXC charges for which SWBT cannot lawfully deny service a direct adjustment will be made to the IXC's accounts receivable purchase as a final recourse after all appropriate collection efforts have been made.
- 2.10.4. The procedures used by SWBT to determine denial status will utilize a single balance due amount.
- 2.10.5. Reserved
- 2.10.6. The Denial of Service function is an auditable component of Billing and Collection Services as defined in Paragraph 1.1.5.