

Exhibit No.: _____
Issue: Alternative Operator Services
Witness: Thomas E. Schmersahl
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Contel of Missouri, Inc.,
Contel System of Missouri,
Inc. and Webster County
Telephone Company
Case No.: TA-88-218 et al.

AFFIDAVIT

STATE OF MISSOURI)
) ss.
COUNTY OF ST. CHARLES)

Comes now Thomas E. Schmersahl being of lawful age and duly sworn and affirms as follows:

1. My name is Thomas E. Schmersahl and I hold the position of Manager-Regulatory and Public Affairs for Contel of Missouri, Inc., Contel System of Missouri, Inc. and Webster County Telephone Company.

2. I have prepared the attached rebuttal testimony, pages 1 through 3, and swear and affirm that the answers therein are true and correct to the best of my information, knowledge and belief.

Thomas E. Schmersahl
Thomas E. Schmersahl

Subscribed and sworn to before me, a notary public, this 6th day of September, 1988.

Janet Lee Smith
Notary Public

My commission expires:

April 17, 1990

JANET LEE SMITH
NOTARY PUBLIC STATE OF MISSOURI
LINCOLN COUNTY
MY COMMISSION EXP. APR. 17, 1990
ISSUED THRU MISSOURI NOTARY ASSOC.

Exhibit No. 15
Date 4-20-88 Case No. TA-88-218 et al
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Thomas E. Schmersahl

Subscribed and sworn to before me, a notary public, this _____ day of _____, 1988.

Notary Public

My commission expires:

REBUTTAL TESTIMONY OF THOMAS E. SCHMERSAHL
ON BEHALF OF
CONTEL OF MISSOURI, INC., CONTEL SYSTEM OF MISSOURI, INC.
AND WEBSTER COUNTY TELEPHONE COMPANY

Q. Please state your name and business address.

A. My name is Thomas E. Schmersahl. My business address is 1700 Continental Drive, Wentzville, Missouri 63385.

Q. Are you the same Thomas E. Schmersahl who has previously filed direct testimony in this proceeding?

A. Yes, I am.

Q. What is the purpose of your rebuttal testimony?

A. I will discuss issues raised in the direct testimony of Mr. James Bryan of American Operator Services, Inc. d/b/a National Telephone Services, Inc. (NTS) and Mr. Paul Freels of International Telecharge, Inc.

Q. Do you have any comments about Mr. Bryan's statement that the volume of complaints lodged against NTS at the Federal Communications Commission (FCC) has been moderate?

A. Yes. Contel doubts whether the number of complaints filed at the FCC is a reliable indicator of public reaction to AOS. Companies like Contel have just become aware of information describing how customers may place complaints with the FCC about problems related to AOS. One would expect that few complaints have been filed with the FCC thus far because this information is just now becoming available. Furthermore, I

suspect that the experience of other LECs has been similar to Contel's, that is, that customers have been complaining to their telephone company and the LECs have been resolving many of the problems as billing complaints before they ever reach the AOS provider or the FCC. In some cases, Contel has simply deleted an entire AOS charge from its bill to avoid angering its customers.

Q. Are you familiar with Mr. Freels' proposed regulatory framework for AOS?

A. Yes. Contel is disturbed about several aspects of Mr. Freels' proposal. Mr. Freels recommends, among other things, that LECs providing billing and collection services for operator service providers be required to include informational bill inserts twice a year informing customers of the existence of alternative providers of operator services. Contel does not believe that such a requirement is either appropriate or lawful.

He has also outlined a rather involved proposal designed, apparently, to adjust intraLATA access rates to reflect the effects of competition in operator services on LEC revenues. Mr. Freels' proposal would require LECs to perform detailed cost studies to quantify the level of contribution from operator services. Contel does not believe that it is appropriate to implement a mechanism to adjust intraLATA access charges in the context of this proceeding. That

process would needlessly complicate a docket that should remain focused on the terms and conditions under which AOS may be provided in Missouri. It would also place Contel and the other LECs in the position of undertaking difficult and expensive cost studies when it is the rates of AOS providers that should be under consideration. The rates LECs charge for particular services are largely irrelevant except so far as they may relate to an AOS provider's cost of service. The relevant information is readily available in tariffs which are on file with the Commission.

Q. Does this conclude your rebuttal testimony?

A. Yes it does.