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DONALD C. OTTO, JR.
HALLIE H. GIBBS II

TELECOPIER
(314) 636-5226

August 22, 1988

FILED
AUG 23 1988
PUBLIC SERVICE COMMISSION

Mr. Harvey G. Hubbs
Secretary
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Case No. TA-88-218

Dear Mr. Hubbs:

Enclosed please find original plus fourteen (14) copies of Suggestions in Opposition to Southwestern Bell Telephone Company's Data Requests for filing in the above referenced matter.

Thank you for your assistance.

Very truly yours,

HENDREN AND ANDRAE

Richard S. Brownlee III
Richard S. Brownlee, III

RSB/k

Enclosures

cc: All Counsel of Record
International Telecharge, Inc.
Teleconnect Company
Office of Public Counsel

FILED

BEFORE THE PUBLIC SERVICE COMMISSION AUG 23 1988
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) Case No. TA-88-218
Intrastate Operator-Assisted)
Resold Telecommunications)
Services.)

SUGGESTIONS IN OPPOSITION TO SOUTHWESTERN BELL
TELEPHONE COMPANY'S DATA REQUESTS

Come now applicants, International Telecharge, Inc.,
Teleconnect Company, Dial U.S. and Dial U.S.A., by Hendren and
Andrae, Richard S. Brownlee, III, and for their Suggestions in
Opposition to Southwestern Bell Telephone Company's Data
Requests, state as follows:

1. The materials requested in Southwestern Bell Telephone
Company's Data Requests, a copy of which is attached hereto,
marked Exhibit A, are the specific names and locations of each
current subscriber to the applicants' service areas in the State
of Missouri. The materials requested are highly confidential,
totally proprietary and would lead to absolutely no admissible
discovery.

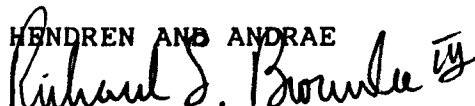
2. The scope of this Data Request goes beyond any data
requested that counsel has seen in any of the competitive cases
and it is a blatant and clear attempt to reach secret and
proprietary customer lists. Southwestern Bell Telephone Company
has continually objected and refused to provide this type of
information. Applicants, therefore, request an order totally
protecting this information from Southwestern Bell Telephone
Company employees, experts or agents.

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X H.D.

3. Applicants further state that said Data Requests are imposed for improper purposes, all in violation of Rule 55.03, Missouri Rules of Civil Procedure, and that sanctions should be entered accordingly, including the striking of pleadings and any other order deemed just and necessary.

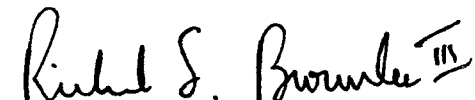
WHEREFORE, applicants pray an order in the premises.

HENDREN AND ANDRAE

Richard S. Brownlee, III
235 E. High Street
P.O. Box 1069
Jefferson City, MO 65102

Attorneys for Applicants

Certificate of Service

I hereby certify that a true copy of the foregoing was mailed on August 23, 1988, by prepaid United States mail to all counsel of record.


Richard S. Brownlee, III

BEFORE THE MISSOURI 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
authority to provide Intrastate)
Operator-Assisted Resold)
Telecommunications Services)


SOUTHWESTERN BELL TELEPHONE COMPANY'S
DATA REQUESTS TO AMERICAN OPERATOR SERVICES, INC.
INTERNATIONAL TELE-CHARGE, INC. TELE-CONNECT COMPANY
DIAL US AND DIAL USA

COMES NOW Southwestern Bell Telephone Company (Southwestern Bell) and propounds the following data requests to American Operator Services, Inc., International Tele-Charge, Inc., Tele-Connect Company, Dial US, and Dial USA to be answered on or before August 23, 1988 and in accordance with 4 CSR 240-2.090:

1. Please provide the name and location of each current subscriber to your operator and/or credit card services (i.e., hotel, motel, other public access facility and coin and coinless telephone) within Missouri.
2. Please state the name of the person(s) responsible for answering the foregoing data request.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By 
THOMAS J. HORN, DURWARD D. DUPRE,
JEANNE A. FISCHER, PAULA J. FULKS
AND RONALD D. YOUNG
Attorneys for Southwestern Bell
Telephone Company
100 North Tucker, Room 630
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(314) 247-3060

Ex. A

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DONALD C. OTTO, JR.
HALLIE H. GIBS II

August 23, 1988

C Mr. Paul Boudreau
Attorney
312 N. Capital Ave.
P.O. Box 456
Jefferson City, MO 65102

Re; Case No. TA-88-218

O Dear Paul:

Enclosed please find Teleconnect Company's Data Requests to Contel. If possible, we would like to have these materials within five (5) days of the date of this letter.

Thank you.

Very truly yours,

HENDREN AND ANDRAE

Original Signed by
Richard S. Brownlee, III
Richard S. Brownlee, III

AUG 24 1988

P
Y

RSB/k
Enclosure
cc: Teleconnect Company
Public Service Commission

FILED
AUG 24 1988

PUBLIC SERVICE COMMISSION

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