



State of Missouri

John Ashcroft, Governor

Office of the Public Counsel
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Martha S. Hogerty
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June 30, 1992

FILED
JUN 30 1992
PUBLIC SERVICE COMMISSION

Mr. C. Brent Stewart
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Phoenix Network, Inc.
Case No. TA-92-301

Dear Mr. Stewart:

Enclosed for filing in the above-referenced case please find the original and fourteen copies of Office of the Public Counsel's Motion for Hearing.

I have on this date mailed or hand-delivered copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to our office.

Thank you for your attention to this matter.

Sincerely,

Randy Bakewell
Assistant Public Counsel

RB:sl

Enclosures

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUN 30 1992

PUBLIC SERVICE COMMISSION

In the matter of the application of
Phoenix Network, Inc., d/b/a Office
Depot Communications, for a
certificate of service to provide
intrastate interLATA telecommuni-
cations services.

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TA-92-301

MOTION FOR HEARING

The Office of Public Counsel (OPC) hereby moves the Commission for a hearing in this matter unless applicant agrees not to collect payphone surcharges through its billing agreements with local exchange companies. See State ex rel. International Telecharge, Inc., et al. v. Missouri Public Service Commission, 806 S.W.2d 680 (Mo. App. 1991).

Public Counsel would have no objection if the Commission addressed this issue separately from the remainder of the application.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By Randy Bakerell
Randy Bakerell
Assistant Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102
314/751-4857

I hereby certify that a copy of the foregoing has been mailed or hand-delivered to all counsel of record on this 30th day of June, 1992.

Randy Bakerell