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REPLY TO SANTA FE OFFICE

July 2, 1992

Arizona State Corporation Commission
Docket Control
1200 W. Washington
Phoenix, Arizona 85007

Re: In The Matter Of The Application Of Operator Service Company for a New Certificate of Convenience and Necessity to Provide Non-Facilities Based Intrastate Interlata Alternative Operator Service Within the State of Arizona; Docket No. U-2612-91-175

Dear Sir/Madam:

Enclosed for filing please find an original plus 11 copies of the Response of Operator Service Company to RUCO's Second Data Request with regard to the above-referenced matter. We ask that you please conform the copy we have enclosed and return it to us in the envelope we have provided.

If you have any questions with regard to the enclosed, please do not hesitate in contacting our office.

Very truly yours,

COMPTON, CORYELL, HICKEY
& IVES, P.A.

By: Kathleen A Padilla
Kathleen A. Padilla
Assistant to Peter N. Ives

enclosures a/s

c: K. Smith (w/enc.)
RUCO (w/enc.)

BEFORE THE ARIZONA CORPORATION COMMISSION

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JUL 6 11 05 AM '92

MARCIA WEEKS
CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
DALE H. MORGAN
COMMISSIONER

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IN THE MATTER OF THE APPLICATION *
OF OPERATOR SERVICE COMPANY FOR A NEW *
CERTIFICATE OF CONVENIENCE AND *
NECESSITY TO PROVIDE NON-FACILITIES * DOCKET NO. U-2612-91-175
BASED INTRASTATE INTERLATA ALTERNATIVE *
OPERATOR SERVICE WITHIN THE STATE OF *
ARIZONA *

Dear Commissioners:

Enclosed for filing is the response of Operator Service Company ("OSC") to the Residential Utility Consumer Office's (RUCO) second set of data requests, dated June 9, 1992. Please file these in accordance with the rules of the Commission.

GENERAL OBJECTIONS

OSC objects to RUCO's Second Set of Data Requests insofar as the Definitions and Explanations section of the Data requests and the cover letter of Kim D. Langdon, Senior Attorney, RUCO, purport to expand or enlarge or enlarge in any way OSC's obligation to provide discovery in the contest of this proceeding.

OSC objects to any data requests which seeks or requests information regarding privileged materials, including but not limited to the attorney client privilege, attorney work product privilege, and privileges relating to nondisclosure of trade secrets and confidential and proprietary business information.

OSC objects to each and every data request which seeks trade secrets or proprietary or confidential business information of OSC.

OSC incorporates by reference all of its objections set forth in its response to RUCO's second data request.

RESPONSE OF OSC
TO RUCO DATA REQUEST NUMBER 2

1. Update answer to sentences 1, 3 and 4 of Question No. 1 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10,

1991.

2. Update answer to Question No. 2 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

3. Update answer to sentences 1 and 2 of Question No. 3 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

4. Update answer to sentences 1, 2 and 4 of Question No. 4 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

5. Update answer to sentences 1, 2 and 3 of Question No. 5 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

6. Update answer to sentences 1 and 2 of Question No. 7 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991. Without waiving its objections, OSC states that it anticipates by December 1992 it will process approximately 100,000 minutes per month of which approximately ten percent (10%) will be intrastate.

7. Update answer to sentences 1 and 2 of Question No. 8 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991. Without waiving its objections, OSC states that it has not changed its rates in Arizona since it began offering services in Arizona.

8. Update answer to sentences 1 and 3 of Question No. 9 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991. In addition to the three carriers previously identified, OSC also now uses WILTEL for 800 access.

9. Update answer to sentences 1 and 2 of Question No. 10 of

RUCO Data Request No. 1.

OSC pays access charges as imposed by the underlying carriers, such as US West and GTE/Contel. The charges that it pays for 800 access are not broken out, but are part of the rates charged by those persons providing OSC with such access.

10. Update answer to sentence 1 of Question No. 11 of RUCO Data Request No. 1.

OSC does not advertise its services in Arizona. OSC has utilized the services of aggregators or marketers for purposes of making face to face contacts for obtaining contracts for OSC's services. Additionally, in limited fashion, telemarketing has been used by some marketers for identifying and obtaining customers. OSC does not send any client correspondence to Arizona consumers.

11. Update answer to sentences 1 and 2 of Question No. 12 of RUCO Data Request No. 1. (Copies of documents are not required at this time).

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

12. Update answer to sentences 1 and 3 of Question No. 13 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

13. Update answer to Sentence 1 of Question No. 14 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

14. Update answer to sentence 1 of Question No. 16 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

15. Update answer to sentence 1 of Question No. 17 of RUCO Data Request No. 1 (Refer instead to Arizona-wide only).

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

16. Update answer to Question No. 18 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991.

17. Update answer to sentences 1 and 2 of Question No. 19 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991.

18. Update answer to Question No. 21 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991. Without waiving its objections, OSC states that it is currently authorized to and/or is providing services (some states do not require prior authorization to provide services) in the states of Arizona, Colorado, Florida, Idaho, Michigan, Montana, New Jersey, New Mexico, Oklahoma, Oregon, Pennsylvania, Texas, Utah and Virginia. OSC also has applications to provide services pending in numerous other states.

19. Update answer to Question No. 23 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991.

20. Update answer to Question No. 26 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991.

21. Update answer to Question No. 27 of RUCO Data Request No. 1.

OSC continues to provide interstate service for traffic originating in Arizona and the approximate volume for said traffic for the month June 1992 was 74,620 minutes.

22. Update answer to Question No. 28 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991.

23. Update answer to Question No. 29 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its reponse to RUCO's first data requests, filed July 10, 1991. Should

the Arizona Commission determine that such information is relevant and required as part of OSC's application process, OSC will be glad to supply said information.

24. Update answer to Question No. 30 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

25. Update answer to Question No. 31 of RUCO Data Request No. 1.

OSC's customers can designate OSC for purposes of "0" calling at the present time. OSC is in the process of developing software which will allow it to be a designated "1+" carrier as well, but does not do so presently.

26. Update answer to Question No. 32 of RUCO Data Request No. 1.

In response to this request, OSC incorporates by reference its response to RUCO's first data requests, filed July 10, 1991.

27. Update answer to Question No. 33 of RUCO Data Request No. 1.

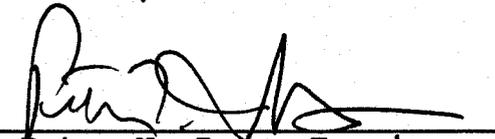
OSC intends to offer its services statewide.

28. Update actual company and headquarter addresses with a company contact person and telephone number.

Kirk Smith, President
Operator Services Company
1624 Tenth Street
Lubbock, Texas 79401

Respectfully submitted,

COMPTON, CORYELL, HICKEY
& IVES, P.A.

By: 

Peter N. Ives, Esquire
Post Office Drawer 9730
Santa Fe, NM 87504-9730
(505) 988-4300

Certificate of Service

I hereby certify that I caused a true and correct copy of the foregoing pleading to be mailed to counsel of records on this 2nd day of July, 1992.



Peter N. Ives