

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CONQUEST OPERATOR SERVICES )  
CORP. FOR A CERTIFICATE OF PUBLIC CON- )  
VENIENCE AND NECESSITY TO OPERATE AS A ) CASE NO. 89-203  
RESELLER OF TELECOMMUNICATIONS SERVICES )  
WITHIN THE STATE OF KENTUCKY )

O R D E R

IT IS ORDERED that ConQuest Operator Services Corp. ("ConQuest") shall file the original and ten copies of its response to the attached comments of South Central Bell Telephone Company within 7 days from the date of this Order. A copy of ConQuest's response shall be sent to all parties of record.

Done at Frankfort, Kentucky, this 6th day of October, 1989.

PUBLIC SERVICE COMMISSION

  
For the Commission

ATTEST:

\_\_\_\_\_  
Executive Director

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CONQUEST )  
TELECOMMUNICATION SERVICES FOR A )  
CERTIFICATE OF PUBLIC CONVENIENCE AND )  
NECESSITY TO OPERATE AS A RESELLER OF ) CASE NO. 89-203  
TELECOMMUNICATIONS SERVICES WITHIN )  
THE STATE OF KENTUCKY )

COMMENTS OF SOUTH CENTRAL BELL TELEPHONE  
COMPANY TO RESPONSE OF CONQUEST OPERATOR SERVICES  
CORPORATION TO INFORMATION REQUEST OF THE COMMISSION

South Central Bell Telephone Company ("SCB"), by counsel, provides Comments to the Responses of ConQuest Operator Services Corporation's ("ConQuest") Information Requests from the Commission as follows:

1. ConQuest's answer to request number 7 is not responsive. In question 6, ConQuest states it does not intend to offer or handle intraLATA traffic, but does not state how it will accomplish this. Question 7 asks how intraLATA traffic will be screened if ConQuest resells an IXC service authorized only for interLATA traffic but which can carry intraLATA traffic. ConQuest's response refers to the answer to question 6. The question of how such unauthorized intraLATA traffic will be screened is not answered.

2. ConQuest's response to question 11 is generally vague and not responsive. It states in 11.1 that a customer in equal access offices may elect to PIC its line to an unspecified feature group

access facility purchased from a LEC. The response does not state, for example, whether the customer may elect to utilize an autodialer, as described in response 11.3 to dial a 950XXX or 800 number to access ConQuest's operator services center. Other network access configurations which the customer may choose are not specified. Without a more precise answer to this question, the Commission will not be able to determine how ConQuest proposes to establish the appropriate jurisdictionality for the calls it will handle.

3. The response to question 14 again is vague and non-responsive. It fails to specify the services or facilities that will be utilized to actually terminate calls. For the Commission to be fully informed in this matter, it should require ConQuest to fully identify and describe how, and over what facilities, it will originate and terminate traffic.

Respectfully submitted,



---

Creighton E. Mershon, Sr.  
General Attorney  
Room 407  
601 W. Chestnut Street  
P. O. Box 32410  
Louisville, KY 40232

Charles L. Howorth, Jr.  
General Attorney  
27th Floor  
600 N. 19th Street  
P. O. Box 771  
Birmingham, AL 35201

COUNSEL FOR SOUTH CENTRAL BELL  
TELEPHONE COMPANY