

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Discontinuance of	)	
the Certificate of Service of	)	<b><u>File No. LD-2023-</u></b>
MGM Interconnect, LLC	)	

**MOTION TO CANCEL REGISTRATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the certificates to provide basic local exchange, intrastate interexchange and non-switched local exchange and the registration to provide interconnected voice over internet protocol (IVoIP) services of MGM Interconnect, LLC, (Company) and states:

1. The Commission previously granted certificates to provide basic local exchange, intrastate interexchange and non-switched local exchange telecommunications services in Case No. LA-2020-0029 on August 8, 2019.

The Commission previously granted a registration to the Company to provide interconnected voice over internet protocol (IVoIP) service authority in Case No. DA-2020-0030 on August 18, 2019.

2. The Company failed to submit an annual report to the Missouri Commission for calendar years 2019, 2020 and 2021. The requirement of a telecommunications company to file an annual report is identified in Sections 392.210 and 392.390, RSMo, and an IVoIP company in 392.550.3(7), RSMo, and 20 CSR 4240-28.012(1)(A). The Company has not responded to Staff's contacts to resolve the deficiency.

3. The Commission has the authority to cancel a telecommunications certificate, or registration, pursuant to Section 392.410.5 RSMo 2000, which provides

“[a]ny certificate of service authority may be altered or modified by the commission after notice and hearing, upon its own motion or upon application of the person or company affected.”

4. The Commission need not hold a hearing, if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989).

**WHEREFORE**, Staff respectfully recommends the Commission cancel the certificates to provide basic local exchange, intrastate interexchange and non-switched local exchange telecommunications services and the registration of service authority to provide interconnected voice over internet protocol service of MGM Interconnect, LLC, and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

**/s/ Whitney Scurlock**

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, to all parties or their representatives pursuant to the Service List maintained by the Commission's Data Center for this file, on this 24th day of March, 2023.

**/s/Whitney Scurlock**