

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

BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service's Motion to Cancel its Certificate of Service Authority to Provide Intrastate Interexchange Telecommunications Services)
Case No. _____

**MOTION TO CANCEL
CERTIFICATE OF SERVICE AUTHORITY TO PROVIDE
INTRASTATE INTEREXCHANGE TELECOMMUNICATIONS SERVICES**

BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service ("BSLD") respectfully requests¹ cancellation of its certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri, and states:

1. BSLD, a Delaware corporation with its principal office located at 675 West Peachtree Street NW, Suite 32046, Atlanta, Georgia 30308, received a certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri from the Commission in an "Order Approving Interexchange Certificate of Service Authority and Order Approving Tariff," issued June 6, 1997, in Case No. TA-97-476.²

2. BSLD has no customers in Missouri and no longer actively offers or provides intrastate interexchange services in Missouri (and has not for years). Canceling the certificate would help conserve BSLD and Commission resources by eliminating the time and expense of making the annual filings necessary to maintain certification and engage in the telecommunications business in the State.

¹ BSLD files this request pursuant to Section 392.410.5 RSMo and the rules of the Missouri Public Service Commission ("Commission").

² BSLD subsequently received a certificate of service authority to provide basic local telecommunications services in the state of Missouri from the Commission in an "Order Approving Merger, Granting Certificate of Service Authority, and Approving Tariff" issued July 1, 2004, in Case No. LM-2004-0552. At BSLD's request, the Commission canceled the basic local certification in an "Order Canceling Certificate and Accompanying Tariff" issued September 6, 2011, in Case No. CD-2012-0055.

3. The Commission has the authority to cancel a certificate of service authority pursuant to Section 392.410.5 RSMo.: “[a]ny certificate of service authority may be altered or modified by the [C]ommission after notice and hearing, upon its own motion or upon application of the person or company affected.” The Commission need not hold a hearing if, following proper notice and opportunity to intervene, no party requests a hearing.³

WHEREFORE, BSLD respectfully requests the Commission to grant this Motion and cancel BSLD’s certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri.

Respectfully submitted,

BellSouth Long Distance, Inc. d/b/a
AT&T Long Distance Service

BY 
Leo J. Bub #34326
909 Chestnut, Room 3558
St. Louis, Missouri 63101
314-235-2508 (Telephone)
314-247-0014 (Facsimile)
leo.bub@att.com

³ In the Matter of the Application of Zayo Fiber Solutions, LLC for Approval to Cancel its Certificate of Authority and Withdrawal of Tariff, File No. LD-2011-0369, Order Directing Notice, at 1, *citing*, State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission, 776 S.W. 2d 494 (Mo. App. W.D. 1989).

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on September 29, 2015:

General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov

Public Counsel
Office of the Public Counsel
PO Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov