

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

In the Matter of the Cancellation of the Certificate)
of Service Authority of AmeriCall, Inc., d/b/a Call)
Solutions, Inc., to Provide Private Pay Telephone) **File No. PD-2012-_____**
Services Within the State of Missouri)

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of service authority of AmeriCall, Inc., d/b/a Call Solutions, Inc., (Call Solutions or Company) and respectfully states as follows:

1. On August 2, 2000, the Commission granted Call Solutions a certificate of service authority to provide private pay telephone service via customer-owned pay telephone (COCT) equipment.
2. On August 7, 2002, the Missouri Secretary of State’s Office (SOS) revoked the foreign Company’s authority to do business in the state of Missouri for failure to file a correct and current 2001 annual report. Pursuant to Section 351.602.3, RSMo (2000), “[t]he authority of a foreign corporation to transact business in this state ceases on the date shown on the certificate revoking its certificate of authority.” See Attachment A. The Company never received reinstatement of its authority to transact business in Missouri.
3. Additionally, the Company’s address listed with the Commission is no longer valid and the contact phone number is out of service. The Staff was able to contact the former counsel for Call Solutions who stated Call Solutions is no longer in business.

4. Pursuant to 4 CSR 240-3.505(1)(B), COCT providers are exempt from the Section 392.390.1, RSMo (2000) requirement to file annual reports. The Company is delinquent in the payment of its fiscal year 2010 assessment.

5. Because Call Solutions can no longer lawfully provide telecommunications services in Missouri, and to the best of the Staff's knowledge, information and belief the Company is no longer in operation, the Staff recommends that the Commission cancel the Company's certificate.

6. The Commission has the authority to cancel a telecommunications certificate pursuant to Section 392.410.5, RSMo (Supp. 2010), 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."

7. 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, the Staff respectfully recommends that the Commission cancel the certificate of service authority of AmeriCall, Inc., d/b/a Call Solutions, Inc., to provide private pay telephone service via customer-owned pay telephone (COCT) equipment.

Respectfully submitted,

/s/Jennifer Hernandez
Jennifer Hernandez
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CERTIFICATE OF SERVICE

I hereby certify that I have provided a true and correct copy of the above pleading by postage prepaid First Class United States Postal Mail or electronic mail to: Call Solutions, Inc., 1785 E. 45th St., Cleveland, OH 44103; Call Solutions, Inc., c/o Registered Agent, Secretary of State, 600 West Main St., Jefferson City, MO 65102; and the Office of the Public Counsel at opcservice@ded.mo.gov this 29th day of November 2011.

/s/Jennifer Hernandez