

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

Cancellation of Certificate of Service)
Authority and Cancellation of Tariff) File No. XD-2011-0202
of Matrix Telecom, Inc. d/b/a IE Com

**MATRIX TELECOM, INC. D/B/A IE COM’S OBJECTION TO AND SUGGESTIONS OPPOSING
STAFF’S MOTION FOR CANCELLATION
AND REQUEST FOR HEARING**

COMES NOW Matrix Telecom, Inc. d/b/a IE Com (“IE Com” or “Company”), by its undersigned counsel, and respectfully submits its objection and suggestions in opposition to the Staff Motion for Cancellation (Staff’s Motion) and, insofar as necessary, requests a hearing on the matter. In support, IE Com states the following to the Commission:

1. IE Com is an authorized interexchange carrier in the state of Missouri. It received its certificate of service authority effective January 18, 2004 in Case No. XA-2004-0238. As part of IE Com’s certification, the Commission approved IE Com’s adoption and ratification, in every respect, of all schedules, rules, notices, concurrences, schedule agreements, divisions, authorities or other instruments whatsoever filed with the Commission by International Exchange Communications, Inc. d/b/a IE COM in its P.S.C. MO. No. 1 tariff.¹ IE Com maintains an approved and effective tariff for interexchange telecommunications services in Missouri.

2. IE Com is the business name for Matrix Telecom, Inc. which was classified as a “competitive” telecommunications company in Missouri on February 22, 2000 in Docket No.

¹ Effective June 8, 2003, the Commission approved Matrix Telecom, Inc.’s acquisition of the assets and subscribers of International Exchange Communications, Inc. in Case No. XM-2003-0274

TA-2000-361. Matrix Telecom, Inc. does business under its own name and under its own Commission approved tariff.

3. On or about December 30, 2010, the Staff of the Commission submitted its motion for cancellation of IE Com's interexchange Certificate of Service Authority ("Motion"). The asserted basis for Staff's Motion is IE Com's lack of reported intrastate revenues in its 2008 and 2009 annual reports.

4. On January 26, 2011, the Commission issued an Order Directing Notice which set a deadline of February 7, 2011 for the filing of objections to the Staff Motion and/or requests for hearing in the matter.

5. IE Com does not challenge Staff's assertion that it did not report revenue in its annual reports for 2008 and 2009; however, IE Com states that *it did have revenue during those reporting years.*² IE Com's annual revenue for 2008 and 2009 was combined with the revenue received by Matrix Telecom, Inc. and the total was reported in Matrix Telecom's separately filed annual reports for those same years.

6. To explain, IE Com did not file an annual report for the year 2007, which in turn prompted a notice from Ms. Jennifer Hernandez of the Commission's general counsel's office, that one should be filed. IE Com's regulatory consultant responded to Ms. Hernandez by letter dated October 23, 2008, a copy of which is attached. Since that time, IE Com files its own separate annual report.

7. Although IE Com files a separate annual report with the Commission, it has not broken out its separate annual revenue for those reports. The annual revenue obtained by Matrix

² For purposes of this response, the Company examined the revenue received for 2009 and was able to break out the IE Com revenue. In that year, IE Com received \$6,799.89. Revenue records for 2008 were not readily available but are obtainable. IE Com reserves the right to supplement this objection with its separated revenue figure for 2008.

Telecom, Inc., under all its business names, is reported in Matrix Telecom Inc.'s separate annual report.

8. IE Com submits that it is still an active carrier in the state of Missouri with an existing customer base taking its services. The public interest would not be served by canceling its certificate and immediately thereafter having the Commission consider a "reapplication" for the same certificate of service authority.

9. The revenue generated by IE Com's operations is reported in the aggregate with Matrix Telecom, Inc., and if necessary, IE Com will change that practice. However, Staff's motion should be denied.

WHEREFORE, IE Com submits its objection to Staff's Motion for cancellation of the Company's Certificate of Service Authority and requests a hearing upon the matter, and after hearing, prays that the Commission deny Staff's Motion.

Respectfully submitted

/s/ Mark W. Comley

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Attorneys for Matrix Telecom, Inc. d/b/a IE
Com

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 7th day of February, 2011, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley



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RE: Response of Matrix Telecom, Inc. d/b/a IE Com

Dear Ms. Hernandez:

Matrix Telecom, Inc. d/b/a IE Com is in receipt of your October 14, 2008 letter regarding the filing of the 2007 Annual Report for Matrix Telecom, Inc. d/b/a IE Com.

The Company did not file a specific annual report for IE Com for year ending 2007 but all revenues for that company have been reported as part of the filing that was made on behalf of Matrix Telecom, Inc. The Matrix filing was received by the Commission on Tuesday, April 15, 2008.

To complete the Commissions records the company is providing a copy of the original Matrix Telecom, Inc. filing as well as a Matrix Telecom, Inc. d/b/a IE Com filing for the period ending December 31, 2007.

Any questions you may have regarding this filing may be directed to me at 407-740-3001 or via email to tforte@tminc.com.

Thank you for your assistance with this matter.

Sincerely,

Thomas M. Forte
Consultant to Matrix Telecom, Inc.

cc: P. Van Voorhees - Matrix
file: Matrix - MO CLEC
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