

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

Application of BellSouth Long Distance, Inc.)
d/b/a AT&T Long Distance Service for Approval)
to Cancel its Certificate of Service Authority to) Case No. _____
Provide Basic Local Telecommunications Services.)

**APPLICATION FOR CANCELLATION OF CERTIFICATE OF
SERVICE AUTHORITY TO PROVIDE BASIC LOCAL
TELECOMMUNICATIONS SERVICES**

COMES NOW BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service, pursuant to Section 392.410.5 RSMo and the rules of the Missouri Public Service Commission (“Commission”), and hereby requests that the Commission cancel its certificate of service authority to provide basic local telecommunications services in the state of Missouri. In support thereof, Applicant states as follows:

1. BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service (hereinafter, “BSLD”), a Delaware corporation whose principal office is located at 675 West Peachtree Street NW, 17E21, Atlanta, Georgia 30375, is authorized to do business in Missouri.¹

2. BSLD may be contacted at the electronic mail address, facsimile and telephone numbers of its attorneys, as set out under the signature block of this Petition.² All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

¹ Pursuant to Commission Rule 2.060(1)(C) (4 CSR 240-2.060(1)(C)) and Rule 2.060(1)(E) (4 CSR 240-2.060(1)(E)), a copy of the certificate from the Secretary of State reflecting that BSLD is authorized to do business in Missouri and a copy of BSLD’s registration of fictitious name, respectively, were submitted on February 27, 2009, in File No. XE-2009-0308.

² See, Commission Rule 2.060(1)(A) (4 CSR 240-2.060(1)(A)).

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3. BSLD has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Petition.³

4. BSLD does not have any overdue annual reports or regulatory assessment fees.⁴

5. Pursuant to the Commission's Order Approving Interexchange Certificate of Service Authority and Order Approving Tariff issued June 6, 1997, in Case No. TA-97-476, BSLD was granted a certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri. The instant Application has no affect upon either this certificate or BSLD's associated tariff (i.e., Resale Interexchange Telecommunications Service Tariff, Missouri Tariff No. 2); both the certificate and the tariff are intended to continue intact.

6. Pursuant to the Commission's Order Approving Merger, Granting Certificate of Service Authority, and Approving Tariff issued July 1, 2004, in Case No. LM-2004-0552, BSLD was also granted a certificate of service authority to provide basic local telecommunications services in the state of Missouri. It is this particular certificate, and BSLD's associated tariff (i.e., Competitive Telecommunications Service Tariff, Missouri Tariff No. 3), that are the subject of this Application.

³ See, Commission Rule 2.060(1)(K) (4 CSR 240-2.060(1)(K)).

⁴ See, Commission Rule 2.060(1)(L) (4 CSR 240-2.060(1)(L)).

7. The Commission has the authority to cancel a certificate of service authority pursuant to Section 392.410.5 RSMo, which states in pertinent part that “[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.” However, the Commission need not hold a hearing if, following proper notice and opportunity to intervene, no party requests a hearing.⁵

8. The services offered pursuant to BSLD’s certificate of service authority to provide basic local telecommunications services and BSLD’s Tariff No. 3 are exclusively business services comprised of Frame Relay Service and Packet Service Line. BSLD has no customers subscribing to either of these services (and has not had any such customers for several years), nor does BSLD have any desire or intention to make such services any longer available. In these circumstances, canceling the certificate and withdrawing the associated tariff are appropriate, both to limit the time, resources and expense necessary to maintain them and to permit BSLD to better streamline its operations.⁶

WHEREFORE, BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service, respectfully requests that the Commission grant its Application and cancel its certificate of service authority to provide basic local telecommunications services in the state of Missouri.

⁵ 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).

⁶ By separate letter filed concurrently via EFIS, BSLD has withdrawn its Tariff No. 3, effective September 19, 2011.

Respectfully submitted,

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

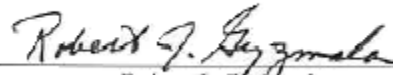
BY 

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on August 18, 2011:


Robert J. Gryzmala

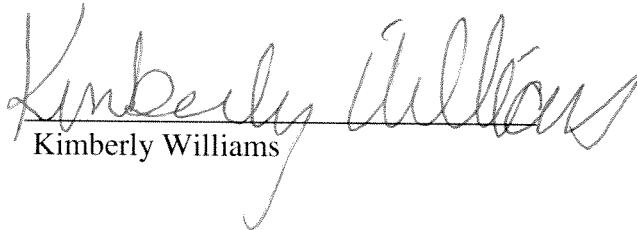
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)
STATE OF GEORGIA) SS

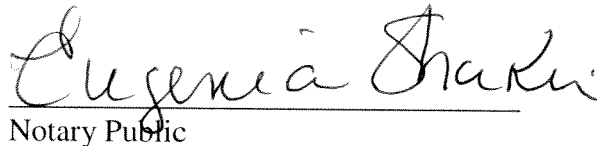
VERIFICATION

I, Kimberly Williams, being duly sworn upon my oath, state that I am over twenty-one, sound of mind, and am Area Manager-Regulatory Regulations, BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service. I am authorized to act on behalf of BellSouth Long Distance, Inc. d/b/a AT&T Long Distance Service regarding the foregoing document. I have read it and verify that the facts contained in it are true and correct according to the best of my knowledge, information and belief.



Kimberly Williams

Sworn and subscribed to before me this 16th day of August, 2011.



Notary Public

Eugenia Shakir
NOTARY PUBLIC
DeKalb County, Georgia
My Comm. Expires
05/18/2014