

In the Matter of the Cancellation of the)
 Certificate of Service Authority of Pacific) File No.
 Centrex Services, Inc.)

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and moves for the Missouri Public Service Commission (“Commission”) to cancel Pacific Centrex Services, Inc.’s (“Pacific” or “Company”) certificates of service authority to provide competitive interexchange, nonswitched local exchange, and basic local telecommunications services and the associated tariffs. For this Motion, Staff respectfully states the following:

1. On June 17, 2004, the Commission in Case No. XA-2004-0509 granted Pacific a certificate of service authority to provide interexchange and nonswitched local exchange telecommunications services, restricted to providing dedicated private line services.

2. Additionally, on September 28, 2004, the Commission in Case No. CA-2004-0508 granted a certificate of service authority to Pacific to provide competitive basic local telecommunications services in the state of Missouri.

3. Pacific has not filed an annual report with the Missouri Public Service Commission for the calendar years 2007 and 2008 as mandated by Section 392.210.1 RSMo (2000) and 4 CSR 240-3.540.

4. Pacific has not paid its fiscal year 2009 Commission assessment and owes a total of \$596.72.

5. The Commission has the authority to cancel a certificate of service authority of a telecommunications corporation pursuant to Section 392.410.5 RSMo (Supp. 2008) which states “[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.”

6. A hearing is not necessary if the Commission gives proper notice and opportunity to intervene and no party requests such a hearing. *State ex rel. Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989).

WHEREFORE, the Staff recommends that after proper notice the Missouri Public Service Commission cancel the certificates of service authority granted to Pacific Centrex Services, Inc., to provide intrastate interexchange, nonswitched local exchange, and basic local telecommunications services and the accompanying tariffs.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez

Legal Counsel

Missouri Bar No. 59814

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360

Jefferson City, MO 65102

(573) 751- 8706 (Telephone)

(573) 751-9285 (Fax)

jennifer.hernandez@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on Pacific Centrex Service, Inc., Legal Department, 6855 Tajunga Ave., North Hollywood, CA 91605 by First Class United States Mail, postage prepaid; John L. Hearne, 300-B East High Street, Jefferson City, MO 65102 by First Class United States Mail, postage prepaid; and The Office of Public Counsel, by electronic mail at opcservice@ded.mo.gov this 17th day of August, 2009.

/s/ Jennifer Hernandez