

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

In the Matter of the Cancellation of the     )  
Certificates of Service Authority and     )     Case No. TD-2007-  
Tariff of Qwest Interprise America, Inc.     )

**MOTION TO OPEN CASE AND CANCEL  
CERTIFICATES OF SERVICE AUTHORITY AND TARIFF**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and moves that the Commission open a case and cancel Qwest Interprise America, Inc.'s certificate of service authority to provide intrastate interexchange telecommunications services in Missouri, and to provide local exchange telecommunications services in the state of Missouri limited to providing dedicated, non-switched local exchange private line services, as well as its tariff, and also its certificate to provide private pay telephone service in the state of Missouri via customer-owned pay telephone equipment. In support of its Motion, Staff respectfully states as follows:

1. In February 1997, the Missouri Public Service Commission (Commission) issued an order granting a certificate of service authority to provide intrastate interexchange telecommunications services and to provide local exchange telecommunications services in the state of Missouri limited to providing dedicated, non-switched local exchange private line services to US WEST Interprise America, Inc. in Case No. TA-97-207. The Commission approved the company's tariff, P.S.C. MO No. 1, in the same case. Subsequently, in Case No. TO-2002-168, the Commission recognized the company's change of name to Qwest Interprise America, Inc. in October 2001.

2. In September 2001, the Commission issued an order granting a certificate of service authority to provide private pay telephone service in the state of Missouri via customer-owned pay telephone equipment to Qwest Interprise America, Inc. in Case No. TA-2002-119.

3. Qwest Interprise America, Inc. has indicated in its confidential Statement of Revenue it submitted to the Commission that it is not providing telecommunications services in Missouri. On that document, the company's representative indicated that it was reporting no Missouri jurisdictional revenue and that it no longer wished to maintain its operating certificates in Missouri. The notarized statement of revenue containing this statement was submitted to the Commission by the Lead Finance Business Analyst of the company and is available on a highly confidential basis from the Commission's Electronic Filing and Information System. The company also submitted a letter with its paperwork requesting certificate cancellation. See Appendix A.

4. In its Annual Report submitted most recently to the Commission, the company reported no revenues and no customers.

5. Qwest Interprise America, Inc. has no past due annual reports or assessments to the Commission. No formal complaints have been filed against the company since the commencement of the Electronic Filing and Information System.

6. The web site of the Office of the Missouri Secretary of State reports that Qwest Interprise America, Inc. is a Colorado corporation in good standing.

7. Because Qwest Interprise America, Inc. has requested cancellation of its certificates and because it is not providing telecommunications service in Missouri, the Staff recommends that the Commission issue an order canceling the company's certificates.

8. The Commission has the authority to cancel a telecommunications corporation certificate pursuant to Section 392.410.5 RSMo (Supp. 2006), which provides:

"Any 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."

However, 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. 1989).

9. This pleading is being served on the addresses provided by the company to the Commission, as well as upon its registered agent in Missouri via certified mail.

WHEREFORE, the Staff recommends the Commission cancel Qwest Interprise America, Inc.'s certificate of service authority to provide intrastate interexchange telecommunications services in Missouri, and to provide local exchange telecommunications services in the state of Missouri limited to providing dedicated, non-switched local exchange private line services, as well as its tariff, PSC MO No. 1; and also its certificate to provide private pay telephone service in the state of Missouri via customer-owned pay telephone equipment.

Respectfully submitted,

/s/ David A. Meyer

David A. Meyer  
Senior Counsel  
Missouri Bar No. 46620

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)  
email: david.meyer@psc.mo.gov

## Certificate of Service

I hereby certify that copies of the foregoing have been mailed return receipt requested or electronically to all counsel of record as shown on the attached service list this 30<sup>th</sup> day of March 2007.

/s/ David A. Meyer

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Qwest Interprise America, Inc. - Interexchange  
1801 California Street, Room 650  
Denver, CO 80202

Qwest Interprise America, Inc. - Payphone  
1801 California Street, Suite 4700  
Denver, CO 80202

Qwest Interprise America, Inc.  
Attn: Deb Haar  
1314 Douglas St., 13<sup>th</sup> floor  
Omaha, NE 68102

The Corporation Company  
Registered Agent for Qwest Interprise America, Inc.  
120 South Central Avenue  
Clayton, MO 63105  
*(Via Certified Mail)*

# Qwest

*Spirit of Service*

**Qwest**

1314 Douglas St., 13<sup>th</sup> floor  
Omaha, NE 68102  
Telephone (402) 422-4476  
Facsimile (402) 422-5585  
Email: Deb.Haar@qwest.com

**Deb Haar**

Lead Finance Business Analyst

March 20, 2007

Missouri Public Service Commission  
Budget & Fiscal Services Department  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Qwest Statements of Revenue for FY-2008 Mo. PSC Assessment

Dear Mr. Henderson:

Enclosed please find the Statements of Revenue for [REDACTED] Qwest  
Interprise America, Inc. [REDACTED] for the calendar year 2006.

You will notice that gross intrastate operating revenue is zero for [REDACTED] Qwest Interprise America, Inc. [REDACTED]  
[REDACTED] The Company does not want to retain the operating certificate for Qwest  
Interprise America, Inc. [REDACTED]  
[REDACTED]

If you have any questions on these reports, you may contact me at 402-422-4476 or by email at  
Deb.Haar@qwest.com.

Sincerely,

  
Deb Haar

RECEIVED

MAR 29 2007

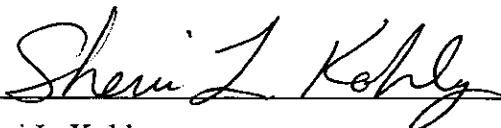
BUDGET & FISCAL SVCS  
MO. P.S.C.

Appendix A

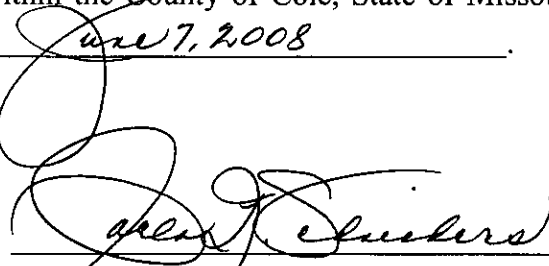
VERIFICATION

STATE OF MISSOURI   )  
                                  )  
COUNTY OF COLE     )

Comes now Sherri L. Kohly, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that the affiant has read the accompanying pleading, and that the facts therein are true and correct to the best of her knowledge.

  
\_\_\_\_\_  
Sherri L. Kohly  
Affiant

Subscribed and affirmed before me this 29<sup>th</sup> day of March 2007. I am commissioned as a notary public within the County of Cole, State of Missouri, and my commission expires on June 7, 2008.

  
\_\_\_\_\_  
NOTARY PUBLIC

