

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

In the Matter of the Cancellation of the)
Eligible Telecommunications Carrier)
Status of Surety Wireless)

File No. RD-2018-0350

AMENDED MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) by and through its counsel and states:

1. On May 24, 2018, Staff filed a *Motion to Cancel Certificate of Service Authority* with the Commission, requesting that the Commission cancel the certificate of service authority for Surety Wireless (Company) pursuant to a request of the Company regarding the same.

2. Commission rule 4 CSR 240-28.030(10), requires a telecommunications, IVoIP or Video Service Provider to provide written notice to the Commission to cancel a certificate or registration previously granted by the Commission containing a statement requesting cancellation and citing the specific certificate(s) of service authority and/or registration(s) as well as requesting cancellation of any applicable tariffs. The notice may be signed by a non-attorney company official and is to be filed in EFIS.

3. Staff now supplements its *Motion* with the non-case related filing (BCES-2018-1764) of the Company reflecting its request, attached to this pleading as Attachment A. Staff has determined that Surety Wireless has met each of the above criteria through this non-case filing.

4. Staff adopts its prior *Motion* filed May 24, 2018, in its entirety and renews its request for the Commission to cancel the certificate of service authority of the Company pursuant to this request.

WHEREFORE, Staff prays the Commission will accept this supplemental filing; provide notice and permit interested parties to intervene in this matter; cancel the eligible telecommunications carrier status in Missouri of Surety Wireless; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

Legal Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 30th day of May, 2018, to all counsel of record.

/s/ Whitney Payne



RECEIVED

May 16, 2018

MAY 18 2018

Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102

*Records
Public Service Commission*

**Re: Assurance Home Phone Services, Inc. d/b/a Surety Wireless Docket No. RA-2011-0298;
Relinquishment of its Eligible Telecommunications Carrier Designation**

Dear Secretary:

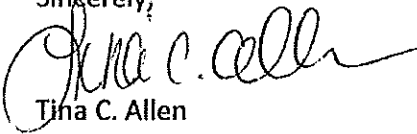
1. In the above referenced docket, the Missouri Public Service Commission designated Assurance Home Phone Services, Inc. d/b/a Surety Wireless ("Surety Wireless") as an Eligible Telecommunications Carrier ("ETC") on a wireless basis to participate in the Lifeline (low-income) program federal Universal Service Fund.
2. Assurance Home Phone Services, Inc. dba Surety Wireless is a Florida corporation with a principal place of business at 4352 SE 95th Street Ocala FL 34480.
3. Surety Wireless provides wireless Lifeline telecommunications services to its consumers in Missouri through the resale of Commercial Mobile Radio Services ("CMRS") provided by Sprint PCS ("Sprint").
4. Surety Wireless seeks to relinquish its ETC designation and to discontinue service in Missouri due to changes in the wireless industry and proposed modifications to the Lifeline program. Surety Wireless also intends to exit its wireless Lifeline business in every state and US territory in which it currently offers wireless Lifeline services.
5. Surety Wireless is not currently enrolling any new Lifeline subscribers in Missouri and currently has 0 wireless Lifeline subscribers in Missouri.
6. Surety Wireless sent a text notification on November 16, 2017, via electronic means, to each of its wireless Lifeline subscribers in Missouri notifying them that they were required to select a new provider. This notice told each subscriber that Surety Wireless planned to relinquish its ETC designation in Missouri and informed each subscriber that they would be de-enrolled from Surety Wireless as of December 17, 2017.
7. As set forth in 47 U.S.C § 214(e)4) and 47 C.F.R. § 54.205, federal law requires the Commission to permit the withdrawal of an ETC designation in any area served by at

least one other ETC. Safelink Wireless, Assist Wireless, Assurance Wireless, and Boomerang Wireless are just a few examples of other Wireless ETCs currently providing service in Missouri.

8. Because there would be no harm to the Public by the cancelling of Surety Wireless' ETC designation, the Company would like to formally withdraw from doing business in the State of Missouri, effective May 31, 2018.

Please let me know if you require any additional information regarding this cancellation request.

Sincerely,



Tina C. Allen

Compliance Manager

Telecom Service Bureau, Inc.

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Direct Line: 352-233-2717