

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Discontinuance of the Registration)
of Mercury Wireless Kansas, LLC d/b/a)
Mercury Broadband) File No. DD-2023-0295

MERCURY WIRELESS KANSAS, LLC
RESPONSE TO MOTION TO CANCEL REGISTRATION

Mercury Wireless Kansas, LLC dba Mercury Broadband ("Mercury"), respectfully submits this Response to Staff's Motion to Cancel Registration:

1. Immediately upon receipt of notice of Staff's Motion to Cancel Registration, Mercury commenced corrective action to address its inadvertent oversight regarding the submission of annual reports.

2. From communications with Staff, Mercury understands that it has now fully addressed Staff's concerns and submitted all required reports.

WHEREFORE, Mercury Wireless respectfully requests that the Commission dismiss this matter and grant such other and further relief as the Commission deems appropriate.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley_____

Carl J. Lumley, #32869
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
clumley@chgolaw.com

Attorneys for Mercury Wireless Kansas, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was emailed, faxed or mailed by U.S. Mail, postage paid, this 3d day of April, 2023, to the persons shown on the attached list.

/s/ Carl J. Lumley

Missouri Public Service Commission
Office General Counsel
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@ded.mo.gov