

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

In the Matter of the Cancellation of the)
Certificate of Service Authority of) Case No. PD-2007-
Michael Ross)

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves that the Commission cancel the certificate of service authority to provide private pay telephone service it has granted to Michael Ross. In support of its Motion, Staff respectfully states as follows:

1. On June 24, 2002, Michael Ross was granted a certificate of service authority by the Missouri Public Service Commission (Commission) to provide private pay telephone services, pursuant to the Commission's authority under Section 386.250, RSMo 2000. The authority was granted in Case No. PA-2002-1051.

2. Mr. Ross' FY2008 (pertaining to calendar year 2006) statement of revenue form reports \$0 annual revenue. Mr. Ross' FY2008 statement of revenue form also indicates that he does not wish to retain his operating certificate.

3. Mr. Ross does not have any past due assessments to the Commission. Payphone providers are not required to submit annual reports. No formal complaints have been filed against this payphone provider since the commencement of the Electronic Filing and Information System.

4. Because Mr. Ross has requested cancellation of his certificate and because he is no longer providing telecommunications service in Missouri, the Staff recommends that the Commission issue an order canceling his certificate of service authority.

5. The Commission has the authority to cancel a telecommunications company certificate pursuant to Section 392.410.5 RSMo (Supp. 2005), 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).

WHEREFORE, the Staff recommends the Commission cancel the certificate of service authority to provide private pay telephone service granted to Michael Ross.

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)

Certificate of Service

I hereby certify that a copy of the foregoing has been mailed return receipt requested to the following address this 6th day of June, 2007.

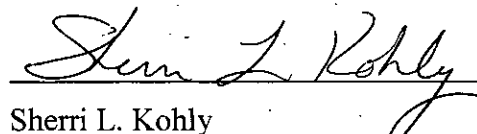
/s/ David A. Meyer

Michael Ross
9402 Newton, Apt. A
Kansas City, MO 64138

VERIFICATION

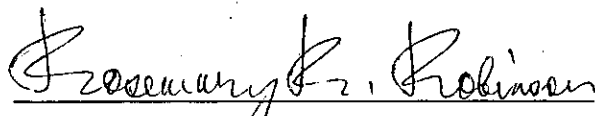
STATE OF MISSOURI)
)
COUNTY OF COLE)

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 6th day of June 2007. I am commissioned as a notary public within the County of Cole, State of Missouri, and my commission expires on 9-23-2008.



NOTARY PUBLIC

