BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the Certificate) of Service Authority of The Phone Connection, Inc., d/b/a Affordable Phone Company.

File No. CD-2012-

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

)

)

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of service authority of The Phone Connection, Inc., d/b/a Affordable Phone Company (Phone Connection or Company) and states as follows:

1. On July 2, 2002, the Commission granted a certificate of service authority to Phone Connection to provide basic local telecommunications services in Missouri under Sections 392.410-.450, RSMo 2000.

2. On April 20, 2011, the Commission received a Ceasing Operation Statement from the Company that requested the cancellation of its certificate of service authority. (See Attachment A).

3. Because the Company requested cancellation of its certificate and it is not providing services in Missouri to the best of the Staff's knowledge, information and belief, the Staff recommends that the Commission cancel the certificate.

4 The Commission has the authority to cancel a telecommunications certificate pursuant to Section 392.410.5 RSMO 2000, which provides "[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."

1

5. 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. W.D. 1989).

6. The Company has submitted its calendar year 2010 annual report.

WHEREFORE, the Staff respectfully recommends that the Commission cancel the certificate of service authority and associated tariff of The Phone Connection, Inc., d/b/a Affordable Phone Company, to provide basic local telecommunications services in Missouri.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez Associate Staff 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 copies of the foregoing have been mailed by first class prepaid United States Postal Service mail or electronically mailed to: The Phone Connection, Inc., Attn: Legal Department, 808 South Baker Street, Mtn. Home, AR 72653; and the Office of the Public Counsel at <u>opcservice@ded.mo.gov</u> this 23rd day of August 2011.

<u>/s/Jennifer Hernandez</u>

THE PHONE CONNECTION, INC. 808 SOUTH BAKER STREET MTN.HOME, AR 72653 (870) 425-4676 FAX: (870) 425-3606 WWW.PAYROLLADVANCEINC.COM

Website: www.payrolladvanceinc.com

April 14, 2011

Missouri Universal Service Fund P.O. Box 752 Jefferson City, MO. 65101 Attn: Administrator

The Phone Connection Inc. dba Affordable Phone Co. is discontinuing local phone service as a CLEC in Missouri.

Please advice what procedure or form is necessary to officially cancel the USF Assessment Fund service.

Thank you for your assistance.

A CLASS OF A PARA

James Beijen The Phone Connection Inc Dba Affordable Phone Co.