

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

In the Matter of the Cancellation of the)	
Certificate of Service Authority)	<u>File No. LD-2020-00XX</u>
of Mitel Cloud Services, Inc.)	Tariff No. YC-2015-0285 and YX-2015-0286

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the certificates of service authority to provide interexchange and competitive local exchange services of Mitel Cloud Services, Inc., (Company) and states:

1. The Commission previously granted certificates to provide competitive local exchange services and intrastate interexchange service authority to the Company under the name Inter-Tel NetSolutions, Inc., on June 17, 2004, in Case No. CA-2004-0485. The Commission recognized three name changes by the Company, one on April 8, 2015, in Case No. TN-2015-0232, one on May 6, 2009 in Case No. CN-2009-0381, and one on May 6, 2009, in Case No. XN-2009-0380.

2. The Company notified the Commission on August 2, 2019, that it wished to voluntarily relinquish its competitive local exchange and intrastate interexchange service authority in a letter filed with the Commission to open this docket. The Company also has two applicable tariffs, Tracking Nos. YC-2015-0285 and YX-2015-0186.

3. Pursuant to 4 CSR 240-28.011(3) notice shall be provided to the Commission to cancel certification(s) or registration(s) previously granted by the Commission. Notice should comply with the following requirements: (A) The company should submit written notice to the commission, as in a letter, containing the following

information: (1) a statement requesting cancellation of a company's certification or registration and citing the specific certificates of service authority and/or registrations; (2) If the company also has a currently effective tariff, then the letter should also request cancellation of the tariff; (B) The letter can be signed by a company official and does not need to be signed or filed by an attorney; and (C) The letter should be electronically filed in EFIS.

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."

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).

WHEREFORE, Staff respectfully recommends the Commission cancel the certificates of service authority to provide interexchange and competitive local exchange services and applicable tariff of Mitel Cloud Services, Inc.; and grant such other and further relief as the Commission finds just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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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 12th day of August, 2019, to all counsel of record.

/s/Whitney Payne