

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

In the Matter of the Cancellation of the )  
Certificate of Service Authority and ) **File No. TD-2015-**  
Tariff of TSI ) **Tariff No. YL-2013-0336**

**MOTION TO CANCEL CERTIFICATE OF  
SERVICE AUTHORITY AND TARIFF**

**COMES NOW** the Staff of the Missouri Public Service Commission and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of competitive basic local and interexchange telecommunications service authority in Missouri of TSI (“the Company”) and states as follows:

1. On December 26, 2003 and January 31, 2004, the Commission granted certificates of competitive basic local and interexchange telecommunications service authority to the Company in Case No. CA-2004-0204 and XA-2004-0214. It has existing approved tariffs, YC-2004-0908 and JC-2006-0100.

2. On January 14, 2015, the Company notified the Commission that it no longer wished to retain its certification to provide telecommunications services in Missouri (see BCES-2015-0376 and 377).

3. 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.”

4. 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**, the Staff respectfully recommends the Commission cancel the certificates of service authority of TSI to provide competitive basic local and interexchange telecommunications service in Missouri and its tariffs.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15<sup>th</sup> day of January, 2015.

