

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

In the Matter of the Cancellation of the)	
Certificate of Service Authority and)	
Accompanying Tariff of Total)	Case No. TD-2005-
Communications Services, Inc.)	

**MOTION TO OPEN CASE AND CANCEL CERTIFICATE OF SERVICE
AUTHORITY**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion to Open Case and Cancel Certificate of Service Authority, respectfully states as follows:

1. On January 31, 1995, the Missouri Public Service Commission (Commission) granted a certificate of service authority to provide interexchange telecommunications services to Total Communications Services, Inc. (TCS) in Case No. TA-95-182. TCS's tariff, P.S.C. MO No. 1, was approved in the same Order.

2. Staff received a letter dated December 3, 2003, from Andrew S. White, Secretary of TCS, stating "By this letter I'm also requesting on behalf of [TCS] that we relinquish our certification as an interexchange telecommunications carrier to provide telecommunications services in the state of Missouri." A copy of the letter is attached as "Appendix A." The request was also referenced in a letter dated June 30, 2004, wherein among other things it was stated that "[TCS] has relinquished its certification as an interexchange telecommunications carrier. A copy of the letter is attached as "Appendix B."

3. On April 19, 2004, the Missouri Secretary of State issued a Certificate of Withdrawal to TCS. Because TCS has no Missouri customers, the cancellation of its interexchange certificate is not detrimental to the public interest.

4. TCS owes no assessments, but does owe its CY 2003 annual report. There are no other matters pending before the Commission. The Commission has the authority to cancel a telecommunications corporation certificate pursuant to Section 392.410.5 RSMo 2000, 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 of Total Communication Services, Inc. to provide interexchange telecommunications services and P.S.C. MO No. 1 tariff.

Respectfully submitted,

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/s/ Mary E. Weston

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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 parties and counsel of record on this 22nd day of March 2005.

/s/ Mary E. Weston

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