

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

In the Matter of Sprint Communications)
Company L.P.'s Request to Cancel its)
Certificates of Service Authority to Provide)
Local Exchange and Interexchange)
Telecommunications Services) **File No. TD-2021-0319**

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 Sprint Communications Company L.P., (Company) and states:

1. The Commission previously granted certificates to provide competitive local exchange services and intrastate interexchange service authority to the Company in Case No. TA-97-269.

2. The Company notified the Commission on March 29, 2021, that it wished to voluntarily relinquish its certificates to provide competitive local exchange and intrastate interexchange services. The letter is attached here as Attachment A.

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 2016, 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 of Sprint Communications Company L.P., and grant such other and further relief as the Commission find.

Respectfully submitted,

/s/ Ron Irving

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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 28th day of April, 2021, to all counsel of record.

/s/ Ron Irving