

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

In the Matter of the Revocation of the)
Service Authority of Telspane Networks LTD)

File No. TD-2017-0282

STAFF'S RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its *Response to Company* states:

1. On April 27, 2017, Staff filed a *Motion* opening Case No. TD-2017-0282, asking the Commission to cancel the authority of Telesphere Networks LTD, to provide interconnected voice-over internet protocol (iVoIP) services in Missouri. Vonage Holdings Corp. filed a response to Staff's *Motion* as the Company acquired Telesphere December 15, 2014, citing certain authorities regarding the Commission's authority to regulate Vonage. The Commission filed an *Order* July 5, directing Staff to respond to those authorities Vonage cited in its initial *Response*. On July 13 Vonage Holdings Corp. filed an additional *Response* in this matter stating that it does not object to Staff's *Motion* requesting the revocation of Telesphere's authority to offer services in Missouri. Vonage states in its letter that while it does not believe Missouri has authority to regulate its services, Telesphere has been merged into its Vonage Business division and no longer offers services in Missouri, therefore it is appropriate for the Commission to revoke its authority.

2. Staff, therefore, asks the Commission to revoke the authority of Telesphere pursuant to its original *Motion* and with the support of Vonage Holdings Corp. as outlined in its *Response* of July 13. Due to the fact that Vonage concurs in

revoking the service authority of Telesphere, because it no longer provides services in Missouri, the question of authority is not applicable in this matter.

WHEREFORE, Staff respectfully recommends that since Vonage represents that Telesphere no longer offers iVoIP services in Missouri, the Commission revoke Telesphere's authority to provide Interconnected Voice Over Internet Protocol services in Missouri; and grant such further relief as the Commission finds appropriate.

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 14th day of July, 2017, to all counsel of record.

/s/Whitney Payne