

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

In the Matter of the Cancellation of the)	
Certificate of Service Authority and Tariff)	<u>File No. XD-2019-0xxx</u>
of Telecom North America, Inc.)	Tariff No. YX-2010-0738

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

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of interexchange service authority and applicable tariff of Telecom North America, Inc. (Company) and states:

1. The Commission previously granted a certificate to the Company January 8, 2003, to provide intrastate interexchange service authority in Case No. XA-2003-0191. The Company was previously known as 3U Telecom, Inc. but informed the Commission of its name change to Telecom North America, Inc. in Case No. TN-2010-0370. The Company has a currently effective tariff, Tariff No. YX-2010-0738.

2. The Company notified the Commission December 7, 2018, that it wished to voluntarily relinquish all of its authority in Missouri in a letter filed as non-case filing BCES-2019-0298, and attached here as Appendix A.

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, Staff respectfully recommends the Commission cancel the certificate of service authority to provide interexchange telecommunications services in Missouri and applicable tariff of Telecom North America, Inc.

Respectfully submitted,

/s/ Whitney Payne

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 December, 2018, to all counsel of record.

/s/ Whitney Payne



Judith A. Riley, J.D.

12316 Hidden Forest Blvd.
Oklahoma City, Ok 73142

December 7, 2018

Via EFIS

Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102-0360

RE: Request for Cancellation of IXC Authority
Telecom North America, Inc.

Commission Staff,

By this letter, Telecom North America, Inc., ("Telna") respectfully requests cancellation of their interexchange authority and any related tariff.

Telna has no customers in Missouri or elsewhere and closed their business effective December 31, 2016. Since Telna has no Missouri customers and had none at the time they closed, there will be no financial impact for granting this request. No outstanding fees should be owed to any telecom funds and there should be nothing pending. Since Telna closed two years ago, we respectfully request relief from any upcoming annual filings and any other relief that the Commission will grant.

If you have questions or if you require additional information, please contact me at 405-755-8177 ext. 2103 or by email at mdean@telecompliance.net.

Respectfully submitted,

/s/ Matt W. Dean

Matt W. Dean
Regulatory Consultant for
Telecom North America, Inc.