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

)

)

)

Cancellation of Certificate of Service Authority and Cancellation of Tariff of Alliance Group Services, Inc.

File No. XD-2011-0185

## WITHDRAWAL OF STAFF MOTION

COMES NOW the Staff of the Missouri Public Service Commission and states as follows:

1. On December 29, 2010, the Staff filed a Motion to Cancel the certificate of service authority granted on October 24, 1998, to Alliance Group Services, Inc. ("the Company"), because it reported no Missouri jurisdictional revenue for the past two years. Staff's motivation for its filing was not to be punitive, but to merely remove those telecommunications companies not actively involved in providing services in Missouri to better maintain the Commission's records.

2. On January 10, 2011, the Staff received the attached e-mail, in which the company indicates that it is actively seeking to conduct telecommunications business in Missouri. The Staff's Motion, if granted, could impede the Company's ability to offer telecommunications services in Missouri, which the Staff views as an undesirable result.

WHEREFORE, Staff withdraws its Motion to cancel the Certificate of Service Authority and tariff for Alliance Group Services, Inc. and asks that this matter be closed without further Commission action.

Respectfully submitted,

Colleen M. Dale Senior Counsel Missouri Bar No. 31624 Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-4255 (Telephone) cully.dale@psc.mo.gov

## **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 10<sup>th</sup> day of January, 2011.

From: Pat Crocker [mailto:patrick@crockerlawfirm.com] Sent: Monday, January 10, 2011 1:23 PM To: Dale, Cully Subject: STAFF MOTION FOR CANCELLATION IN RE ALLIANCE GROUP SERVICES, INC. Importance: High

Dear Ms. Dale,

We are the attorneys for Alliance Group Services, Inc. ("AGSi"). Thank you for taking the time to speak with me concerning the Staff Motion For Cancellation of AGSi's Certificate of Service Authority and tariff in Missouri.

As indicated on the telephone, AGSi primarily provides wholesale service to resellers and other carriers. Although this wholesale activity over the past few years has not produced assessable revenue for the Commission, AGSi engages in the marketing of other services which may imminently result in generating Missouri jurisdictional revenue. Further, AGSi underlying network providers require that AGSi maintain authority to provide interexchange telecommunication services in Missouri, and throughout the United States, in order to interconnect with the network.

For these reasons, we respectfully request that the Staff withdraw the Motion for Cancellation filed in File No. XD-2011-0 seeking to cancel AGSi's authority to provide intrastate interexchange telecommunications services within Missouri.

Thank you in advance for your consideration of our request.

Best Regards,

Patrick Crocker

## Crocker & Crocker, PC

www.compliancelawfirm.com The Kalamazoo Building 107 West Michigan Avenue, Fourth Floor Kalamazoo, MI 49007

269.381.8893 x226 269.381.4855 fax 231.206.5069 Cell

This email contains information from the law firm of Crocker & Crocker, P.C. which may contain privileged and confidential attorney-client communications. The information is intended *only* for the use of the intended recipient(s). If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is strictly prohibited. If you have received this email in error, please notify us by telephone immediately at (269.381.8893) and permanently delete the email from your computer system.

IRS CIRCULAR 230 NOTICE: Any U.S. federal tax advice contained in this communication (including any attachments) was neither written nor intended by the sender to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending to another person any tax related matter.