BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the Registration)
of North American Telecommunications	File No. DD-2018-0056
Corporation to Provide Interconnected Voice)
Over Internet Protocol Service)

MOTION TO CANCEL AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the authority to provide Interconnected Voice Over Internet Protocol (iVoIP) services in Missouri of North American Telecommunications Corporation (NATC) and states as follows:

- 1. On August 28, 2017, NATC filed an application asking the Commission to cancel its authority to provide iVoIP services in Missouri. The Commission originally granted NATC the authority to provide iVoIP services throughout Missouri on April 12, 2015, in Case No. DA-2015-0228.
- 2. Pursuant to 4 CSR 240-28-030(10) 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.

3. NATC submitted a letter to the Commission, properly filed in the Commission's Electronic Filing and Information System (EFIS), bearing a request for cancellation of its authority to provide VoIP services in Missouri. The letter is signed by a regulatory consultant, which Staff purports is an individual authorized by NATC to handle its regulatory affairs. NATC does not have any tariffs currently effective before this Commission.

WHEREFORE, Staff respectfully recommends the Commission cancel North American Telecommunication Corporation'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 12th day of September, 2017, to all counsel of record.

/s/Whitney Payne