

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

In the Matter of the Cancellation of the)
IVoIP Registration of Knology Provider)
Solutions Group, Inc.)

File No. DD-2015-

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY AND TARIFF

COMES NOW the Staff of the Missouri Public Service Commission and moves for the Missouri Public Service Commission (Commission) to cancel the IVoIP registration of Knology Provider Solutions Group, Inc. (“the Company”) and states as follows:

1. On February 15, 2000, the Commission granted IVoIP registration to the Company in Case No. TA-2000-420.

2. On March 11, 2015, the Company notified the Commission that it no longer wished to retain its IVoIP registration in Missouri (see the Company’s Statement of Revenue for the FY-2016 Mo PSC Assessment).

3. The Commission has the authority to cancel an IVoIP registration pursuant to Sections 392.550 and 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, the Staff respectfully recommends the Commission cancel IVolP registration Knology Provider Solutions Group, Inc. to provide payphone services in Missouri.

Respectfully submitted,



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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 3th day of June, 2015.

