

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service  
Commission held at its office  
in Jefferson City on the 21st  
day of November, 2019.

In the Matter of the Application of       )  
Click Computers, Inc. for Registration    )  
To Provide Interconnected                )  
Voice over Internet Protocol Services     )

**File No. DA-2020-0134**

**ORDER REJECTING APPLICATION FOR  
REGISTRATION AS AN IVOIP PROVIDER**

Issue Date: November 21, 2019

Effective Date December 1, 2019

On November 14, 2019, Click Computers, Inc., filed an application for registration to provide interconnected voice over internet protocol (IVoIP) service. Click Computers' application was signed by a representative of Global Strategic Accountants (GSA), but was not signed by an attorney licensed to practice law in Missouri. Along with its application, Click Computers filed a letter from GSA acknowledging that the application was not signed by an attorney, but asking that the Commission waive the rule requirement because, given the lack of complexity associated with this type of application, the services of an attorney are not needed.

The signature of a Missouri-licensed attorney on an application for registration to provide IVoIP service is specifically required by Commission rule 20 CSR 4240-28.011(1)(B). The Commission is bound by the terms of its own regulations just as are the utilities the Commission regulates.<sup>1</sup> Click Computers asks the Commission to waive application of its rule, but it is not situated differently than any other applicant for

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<sup>1</sup> *Fowler Land Company v. Mo. Dept. of Natural Resources*, 460 S.W.3d 502, 507, (Mo. App. 2015).

registration to provide IVolP service. If the Commission were to grant Click Computers a waiver, it would have to grant the same waiver to every other applicant for registration. As a result, Click Computers is really asking the Commission to amend its regulation by granting a general waiver. The Commission cannot do so. The Commission may only amend its rule by following the lengthy process set out in Section 536.021, RSMo 2016.

For that reason, the Commission must reject Click Computers' application for registration to provide IVolP service. This rejection is without prejudice, and Click Computers may file a new application signed by a Missouri-licensed attorney as required by the Commission's rule. Section 392.550.3, RSMo requires the Commission to act on this application within 30 days, and Click Computers should be given an opportunity to promptly move forward with a compliant application. For those reasons, the Commission will make this order effective in ten days.

**THE COMMISSION ORDERS THAT:**

1. The Application of Click Computers, Inc. for Registration to Provide Interconnected Voice over Internet Protocol Service is rejected.
2. This order shall become effective on December 1, 2019.



**BY THE COMMISSION**

A handwritten signature in black ink that reads "Morris L. Woodruff".

Morris L. Woodruff  
Secretary

Silvey, Chm., Kenney, Rupp, and  
Coleman, CC., concur.

Woodruff, Chief Regulatory Law Judge

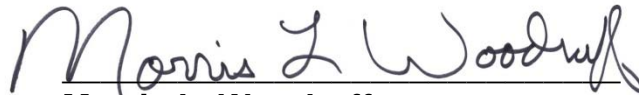
**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 21<sup>st</sup> day of November 2019.**



  
**Morris L. Woodruff**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**November 21, 2019**

**File/Case No. DA-2020-0134**

**Missouri Public Service  
Commission**

Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
staffcounsel@psc.mo.gov

**Office of the Public Counsel**

Marc Poston  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opc@opc.mo.gov

**Click Computers, Inc.**

Legal Department  
107 W Street, Suite I  
Stockton, MO 65785  
doug@clockcomp.com

**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

**Sincerely,**



**Morris L. Woodruff  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.