

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

In the Matter of the Cancellation of the)
Certificates of Service Authority and)
Accompanying Tariff of Group Long)
Distance, Inc.)

Case No. TD-2007-_____

**MOTION TO OPEN CASE AND CANCEL
CERTIFICATES OF SERVICE AUTHORITY AND ACCOMPANYING TARIFF**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves that the Commission cancel Group Long Distance, Inc.'s certificates of service authority to provide basic local and interexchange telecommunications services and its tariff. In support of its Motion, Staff respectfully states as follows:

1. In October 1996, the Commission granted Group Long Distance, Inc. a certificate to provide intrastate interexchange telecommunications service in Missouri in Case No. TA-97-72. The Commission approved the company's tariff, P.S.C. MO TARIFF No.1 in the same case.

2. In May 1998, the Commission granted Group Long Distance, Inc. a certificate to provide basic local telecommunications service in Missouri in Case No. TA-98-112. The company never submitted a tariff to provide these services.

3. The web site of the Office of the Missouri Secretary of State reports that the authority of Group Long Distance, Inc., a Florida corporation, to do business in Missouri was revoked on December 31, 2002 because the company failed to file its Annual Registration Report. Section 351.602.3 RSMo. (2000) states that "[t]he authority of a foreign corporation to transact business in this state ceases on the date shown on the certificate revoking its certificate of authority."

4. Messages left on a personal answering machine at one telephone number provided to the Commission by the company receive no response, and other telephone numbers provided by the company are no longer in service. Mail sent to the address provided by the company has been returned as undeliverable. See Appendix A.

5. Group Long Distance, Inc., owes no assessments or annual reports. Its 2004 and 2005 calendar year annual reports both reflect that the company had no revenues and no customers in Missouri.

6. Staff believes that Group Long Distance, Inc., has violated the terms of its certificate by its failure to keep the Commission informed of its current telephone number or provide current contact information. Section 392.210(2) RSMo. (2000) states, among other things, "The commission shall at all times have access to all accounts, records and memoranda kept by telecommunications companies... ." Because Group Long Distance, Inc., has failed to keep the Commission informed of a current address or telephone number, the Commission is unable to contact the company. Therefore, Group Long Distance, Inc., has denied the Commission access that is required of the Commission under Section 392.210(2) RSMo. (2000). Certainly, Group Long Distance, Inc., has denied the Commission its ability to supervise telecommunications operations and services as statutorily mandated under Section 386.250 RSMo. (2000).

7. No customers have contacted the Commission with complaints about Group Long Distance, Inc., since the commencement of the Commission's EFIS system.

8. The Commission has the authority to cancel a telecommunications corporation certificate pursuant to Section 392.410.5 RSMo (Supp. 2006), which provides:

Any 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.

However, 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. 1989).

9. Thus, the Commission has the authority to cancel the certificate of service authority it granted to Group Long Distance, Inc., to provide intrastate interexchange telecommunications services in Missouri in Case No. TA-97-72, as well as the company's tariff, PSC MO TARIFF No.1; and also, its certificate of service authority to provide basic local telecommunications in Case No. TA-98-112. Such an action is supported because the company is required to wind up its operations in Missouri as it has lost its authority to do business here; and because the Commission's Staff is unable to communicate with the company.

10. This pleading is being served upon the most recent address provided to the Commission by the company. It is also being served by certified mail upon its registered agent.

WHEREFORE, the Staff recommends the Commission cancel the certificate of service authority it granted to Group Long Distance, Inc., to provide a certificate to provide intrastate interexchange telecommunications service in Missouri in Case No. TA-97-72, as well as the company's tariff, P.S.C. MO TARIFF No.1; and also its certificate to provide basic local telecommunications services granted in Case No. TA-98-112.

Respectfully submitted,

/s/ David A. Meyer

David A. Meyer
Senior Counsel
Missouri Bar No. 46620

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or electronically mailed to all parties of record as shown below this April 9, 2007.

/s/ David A. Meyer

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Jefferson City, MO 65101
(Via Certified Mail)



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RETURN TO SENDER
GROUP LONG DISTANCE
UNABLE TO CLOSE
RETURN TO SENDER

FIRST CLASS



UNITED STATES POSTAGE
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0004350512 JAN 12 2007
MAILED FROM ZIP CODE 65101

RECEIVED

FEB 14 2007

BUDGET & FISCAL SVCS
MO. P.S.C.

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CLCC #1X2

ASSESSMENT

08551+0534-34 8012

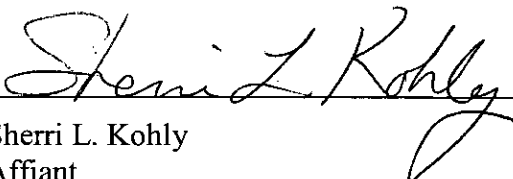


Appendix A

VERIFICATION

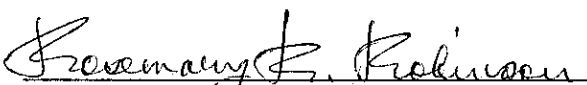
STATE OF MISSOURI)
)
COUNTY OF COLE)

Comes now Sherri L. Kohly, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that the affiant has read the accompanying pleading, and that the facts therein are true and correct to the best of her knowledge.



Sherri L. Kohly
Affiant

Subscribed and affirmed before me this 9th day of April 2007. I am commissioned as a notary public within the County of Cole, State of Missouri, and my commission expires on 9-23-2008.



NOTARY PUBLIC

