# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the	)	
Certificate of Service Authority of	)	File No. LD-2020-0018
Talk America Services, LLC	)	

### **MOTION TO WITHDRAW**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and withdraws its previously filed *Motion to Cancel Certificate of Service Authority* in this matter.

- 1. Talk America Services, LLC, ("Talk America" or "Company"), filed with the Commission a letter accompanied by its Section 63.71 filing to the Federal Communications Commission (FCC) seeking authorization to discontinue the provision of all exchange access and/or interstate long distance services in several states, including Missouri. This letter and accompanying filing were filed as a "ceasing operations statement" in non-case filing BCES-2020-0035.
- 2. Staff filed its *Motion to Cancel Certificate of Service Authority* interpreting Talk America's letter and FCC filing as an indication that the Company was asking the Commission to cancel its authority to provide telecommunications services in Missouri. However, Talk America filed a *Response* to Staff's Motion on July 31, 2019, asking the Commission not to cancel its certificate of service authority, but simply to accept the letter as an indication of its intent to discontinue service to its existing Missouri customer base. Talk America also indicates in the letter that it may pursue future opportunities to provide competitive telecommunications services to Missouri customers under its existing certificate.

3. In light of Talk America's *Response* Staff wishes to withdraw its previously filed *Motion* and asks the Commission to permit Talk America to retain its certificate to provide telecommunications services in Missouri and to close this docket.

WHEREFORE, Staff respectfully asks the Commission to permit it to withdraw its *Motion to Cancel Certificate of Service Authority*; to permit Talk America Services, LLC, to retain its certificate to provide basic local telecommunications services in Missouri; to close this docket; and to grant such other and further relief as the Commission finds just in the circumstances.

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 6th day of August, 2019, to all counsel of record.

### /s/Whitney Payne