BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the) Certificate of Service Authority to Provide) Local and Interexchange Telecommunications) Services of Momentum Telecom, Inc.)

File No. LD-2015-____

STAFF MOTION

COMES NOW the Staff of the Missouri Public Service Commission and for its motion, states as follows:

1. On July 29, 2014, Momentum Telecom, Inc. ("the Company") requested the Commission cancel its certificate of service authority to provide basic local exchange and interexchange telecommunications service. The Company was granted authority to provide such telecommunications services on May 3, 2008, in File No. LA-2008-0282. The request is filed in EFIS under BCES-2015-0043. The Company has no effective tariffs.

2. Because the Company requested cancellation of its service authority and it is not providing telecommunications services in Missouri, the Staff recommends the Commission cancel its certificate.

3. The Commission has the authority to cancel a telecommunications certificate pursuant to Section 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."

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WHEREFORE, the Staff recommends that the Commission cancel the Certificate of Service Authority for Momentum Telecom, Inc. to provide local exchange and interexchange telecommunications service in Missouri, and cancel any accompanying tariff(s).

Respectfully submitted,

Colleen M. Dale Senior Counsel Missouri Bar No. 31624 Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-4255 (Telephone) cully.dale@psc.mo.gov

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 25th day of November, 2014.

BRADLEY ARANT BOULT CUMMINGS

RECEIVED

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Henry Walker Direct: 615.252.2363 Fax: 615.252.6363 hwalker@babc.com

Records Public Service Commission

July 24, 2014

Missouri Public Service Commission ATTN: Data Center 200 Madison Street P. O. Box 360 Jefferson City, MO 65102-0360

> Re: Momentum Telecom, Inc. Docket No. LA-2008-0282

Dear Sir:

Momentum Telecom, Inc. (Docket No. LA-2008-0282) respectfully requests that its certificate to operate in Missouri be cancelled, effective immediately.

Please call me at 615-252-2363 if you have any questions.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

HW/mf

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