

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

In the Matter of the Cancellation of the)	
Certificate of Service Authority of)	<u>File No. LD-2019-0000</u>
Flowroute Inc. and Flowroute CLEC Inc.)	

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of interexchange service authority of Flowroute, Inc. and Flowroute CLEC, Inc. (Companies) and states:

1. The Commission previously granted a certificate to Flowroute, Inc. on March 25, 2014, to provide basic local telecommunications, non-switched local and intrastate interexchange service authority in Case No. TA-2014-0236. The Commission also granted a certificate of service exchange authority to provide basic local telecommunications services on December 22, 2017, to Flowroute CLEC, Inc. in Case No. CA-2018-0173. The Company was previously known as Flowroute, LLC, but informed the Commission of its name change to Flowroute, Inc., in Case No. LN-2015-0072.

2. The Company notified the Commission December 17, 2018, that it wished to voluntarily relinquish all of its authority in Missouri for both Companies in letters filed as non-case filings BCES-2019-0306 and BCES-2019-0305, and attached here as Appendix A.

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.”

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, Staff respectfully recommends the Commission cancel the certificates of service authority to provide basic local telecommunications, non-switched local and intrastate interexchange telecommunications services in Missouri of Flowroute, Inc. and Flowroute CLEC, Inc.

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 20th day of December, 2018, to all counsel of record.

/s/ Whitney Payne

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December 14, 2018

By Overnight Delivery

Morris Woodruff, Secretary
Missouri Public Service Commission
200 Madison Street, Suite 500
Jefferson City, Missouri 65102-0360

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DEC 17 2018

Records
Public Service Commission

Re: *Request for Motion to Cancel Telecommunications Authorizations of Flowroute Inc. and Flowroute CLEC Inc., File Nos. LN-2015-0072 and CA-2018-0173*

Dear Mr. Woodruff:

Flowroute Inc. ("Flowroute") and its wholly owned subsidiary Flowroute CLEC Inc. ("Flowroute CLEC"), through their undersigned counsel, hereby request for the Missouri Public Service Commission ("Commission") to file a motion to cancel Flowroute's and Flowroute CLEC's authorizations to provide basic local telecommunications services.¹ Flowroute and Flowroute CLEC were granted authority by the Commission to provide basic local telecommunications services in all exchanges in the State of Missouri in File Nos. LN-2015-0072 and CA-2018-0173, respectively.

Neither Flowroute nor Flowroute CLEC provide any services in the State of Missouri that require either company to continue to hold a telecommunications authorization. Therefore, the cancellation of Flowroute's and Flowroute CLEC's authorizations will not affect either company's operations or customers in the State of Missouri in any way. Finally, Flowroute and

¹ The Commission granted telecommunications authorization to Flowroute LLC on April 4, 2014 in File No. TA-2014-0236. The Commission recognized the name change to Flowroute Inc. on October 10, 2014 in File No. LN-2015-0072. On November 21, 2017, Flowroute and Flowroute CLEC filed an application in File No. LM-2018-0141 for approval of a pro forma reorganization in which Flowroute's operating authority would be transferred to Flowroute CLEC. On December 4, 2017, the Commission dismissed the application, stating that it does not have statutory authority to approve or disapprove the proposed corporate reorganization. On January 2, 2018, Flowroute CLEC was granted authority by the Commission to provide basic local telecommunications services in all exchanges in the State of Missouri in File No. CA-2018-0173. On June 29, 2018, West Corporation ("West") and Flowroute notified the Commission of their intent to consummate a transaction whereby West would acquire ultimate control of Flowroute and Flowroute CLEC. On September 5, 2018, West notified the Commission that the transaction was completed on August 15, 2018.

Mr. Morris Woodruff, Secretary
Missouri Public Service Commission
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Flowroute CLEC are current in the payment of their fiscal year assessments and the submission of their annual reports.

Please date-stamp the extra copy of this filing and return it in the envelope provided. If you have any questions regarding this request, please contact the undersigned.

Respectfully submitted,

/s/ Phillip Marchesiello

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