

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

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| In the Matter of the Cancellation of the Certificate of |) | |
| Service Authority of Key Communication Management |) | |
| Inc., d/b/a Discount Plus to Provide Competitive |) | File No. XD-2012- _____ |
| Intrastate Interexchange Telecommunications Services in |) | |
| the State of Missouri |) | |

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of service authority and associated tariff of Key Communication Management Inc., d/b/a Discount Plus (Discount Plus or Company). For this Motion, the Staff respectfully states as follows:

1. On January 11, 1996, the Commission granted Discount Plus a certificate of service authority to provide competitive intrastate interexchange telecommunications services in the state of Missouri in Case No. TA-96-143.
2. On October 17, 2009, the Missouri Secretary of State's Office issued a *Notice Of Expiration For A Fictitious Name Registration* for the Company's failure to renew its fictitious name registration. Pursuant to Section 417.210.8, RSMo (Supp. 2010), Discount Plus stands expired. See Attachment A.
3. Additionally, Discount Plus has failed to file its calendar year 2010 annual report with the Commission and pay its fiscal year 2012 assessment.
4. Because Discount Plus can no longer lawfully provide telecommunications services in Missouri, the Staff recommends that the Commission cancel the Company's certificate and associated tariff.

5. The Commission has the authority to cancel a telecommunications certificate pursuant to Section 392.410.5, RSMo (Supp. 2010), 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.”

6. 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, the Staff moves for and recommends the Commission cancel the certificate of service authority and associated tariff of Key Communication Management Inc., d/b/a Discount Plus, to provide competitive intrastate interexchange telecommunications services in the state of Missouri.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez
Associate Staff Counsel
Missouri Bar No. 59814

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751- 8706 (Telephone)
(573) 751-9285 (Fax)
jennifer.hernandez@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that I have provided a true and correct copy of the above pleading by United States Postal Mail postage prepaid to: Discount Plus, 107 W. Michigna 4th Floor, Kalamazoo, MI 49007; Key Communication Management Inc., c/o John L. Hearne, Registered Agent, 300-B East High Street, Jefferson City, MO 65101; and by electronic mail to the Office of the Public Counsel at opcservice@ded.mo.gov this 28th day of December 2011.

/s/Jennifer Hernandez