

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

In the Matter of the Cancellation of the Certificates)	
of Service Authority of:)	
)	
Alan Ray Felten)	
Nathan Veach)	
Jim Ecton d/b/a JSE Enterprises)	Case No. PD-2006-
Catherine A. Ragland)	
Desh V. Anand)	
John B. Degraffenreid)	
Thomas Parr)	
Todd R. Prother)	

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

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves that the Commission open a case and cancel the certificates of service authority to provide private pay telephone service of the above-captioned individuals. In support of its Motion, Staff respectfully states as follows:

1. The above captioned individuals (Providers) have been granted certificates of service authority by the Missouri Public Service Commission (Commission) to provide private pay telephone services, pursuant to the Commission's authority under Section 386.250, RSMo 2000. A list containing information for each of the Providers was prepared and verified by affiant Staff employee Sherri L. Kohly of the Utility Operations Division of the Commission. A copy of said list is marked "Appendix A," attached hereto and made a part hereof.

2. Each of the Providers shares the following facts that support Staff's motion to open a mass docket case for the cancellation of the Providers' certificates:

a) Each of Provider's 2005 statement of revenue forms report \$0 annual revenue.

- b) Each of the Provider's 2005 statement of revenue forms indicates that the Providers do not wish to retain their operating certificate.

3. None of the Providers owe assessments to the Commission. As payphone providers, these individuals do not have to provide annual reports to the Commission. No formal complaints have been filed against any of the Providers since the commencement of the Electronic Filing and Information System.

4. Because the Providers have requested cancellation of their certificates and because they are no longer providing telecommunications service in Missouri, the Staff recommends that the Commission issue an order canceling their certificates of service authority.

5. The Commission has the authority to cancel a telecommunications company certificate pursuant to Section 392.410.5 RSMo (Supp. 2005), 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).

6. Staff is serving this verified pleading via certified mail on the last known address of the Providers as reflected in Appendix A. Commission Rule 4 CSR 240-2.080(17)(C)(1) states that service by mail is complete upon mailing.

WHEREFORE, the Staff recommends the Commission cancel the certificates of service authority to provide private pay telephone service.

Respectfully submitted,

/s/ David A. Meyer

David A. Meyer

Senior Counsel

Missouri Bar No. 46620

Attorney for the Staff of the
Missouri Public Service Commission

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Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed return receipt requested or hand-delivered to all counsel of record as shown on the following service list this 23rd day of May, 2006.

/s/ David A. Meyer

Service List

Certificated Provider Name and Address

Case Number Date of Certification

Alan Felten
408 North Park
Sedalia, MO 65301

TA-96-215
02/07/96

Nathan Veach
7410 Triwoods, Unit F
St. Louis, MO 63119

PA-2005-0225
03/10/05

Jim Ecton d/b/a JSE Enterprises
1536 Santa Anna
St. Charles, MO 63303

PA-2005-0032
09/11/04

Catherine A. Ragland
9123 Mary Mark
St. Louis, MO 63134

PA-2004-0615
07/30/04

Desh V. Anand
2304 Principia Dr.
Maryland Heights, MO 63043

PA-2005-0082
11/12/04

John B. Degraffenreid
7721 Benson St.
Overland Park, KS 66204

TA-2001-105
09/14/00

Thomas Parr
P.O. Box 3536
Joplin, MO 64803

TA-98-228
01/14/98

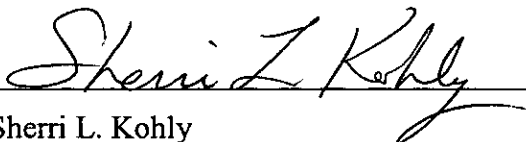
Todd R. Prather
646 Nirk Ave.
Kirkwood, MO 63177

PA-2004-0612
08/06/04

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 22nd day of May 2006. I am commissioned as a notary public within the County of Cole, State of Missouri, and my commission expires on June 7, 2008.



NOTARY PUBLIC

