

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

Cancellation of Certificate of Service Authority of) **File No. PD-2011-**
JN Payphones, LLC)

STAFF MOTION FOR CANCELLATION

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

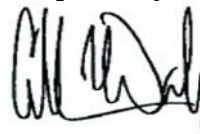
1. On July 21, 2006, JN Payphones, LLC (the Company) was granted authority to provide private payphone services in File No. PA-2006-0484.
2. For the years 2008 and 2009, the Company reported zero Missouri jurisdictional revenue in its annual statements of revenue for those years, BSOR-2009-1287 and BSOR-2010-1707, respectively.
3. It is contrary to the public interest to allow private payphone companies with no business in Missouri for over a year to retain their certificates. Companies that report zero revenue are not assessed any portion of the Commission's annual operating assessment. However, these companies consume significant Staff time in recordkeeping and in monitoring compliance with reporting requirements, such as jurisdictional revenue statements. The costs of that recordkeeping and monitoring are passed on to the ratepayers of other companies that do have revenue in Missouri, which the Staff believes is unfair and contrary to the public interest. Moreover, the application process for payphone providers is extremely streamlined, so that a company can reinstate its certificate with very little effort in a short period of time. The Staff believes that

cancellation of certificates of private payphone service authority will not materially harm those companies.

4. 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.”

WHEREFORE, Staff moves that the Commission cancel the Certificate of Service Authority of JN Payphones, LLC.

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 March, 2011.

