BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the)	
Certificate of Service Authority of)	File No. PD-2015-
Mumtaz Lalani)	

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of payphone service authority in Missouri of Mumtaz Lalani ("the Company) and states as follows:

- 1. On June 18, 2004, the Commission granted a certificate of payphone service authority to the Company in Case No. PA-2004-0572.
- 2. On February 14, 2014, the received information that the Company no longer offered service. (see attachment). The Company failed to file an annual report or pay any assessment to the Commission. The Staff believes that the Company no longer provides telecommunications services in Missouri.
- 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, the Staff respectfully recommends the Commission cancel the certificate of service authority of Mumtaz Lalani to provide payphone telecommunications service in Missouri.

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 14th day of November, 2014.

HIGHLY CONFIDENTIAL STATEMENT OF REVENUE

FY-2015 Mo. PSC Assessment

Mumtaz Lalani (Payphone) 15 Gone	LEB 1 4 ZUI4
#1 Midland Ave.	Budget & Fiscal Services
Maryland Heights, MO 63043	MO. P.S.C.
I,	
NAME	,TITLE
E-MAIL ADDRESS	TELEPHONE #
hereby certify that the GROSS INTRASTATE OPERATI	NG REVENUE of the above-
named Company in the State of Missouri, for the calendar	year 2013, is:
NOTE: THE GROSS INTRASTATE OPERATING REVENUE REPORTED ON THIS ST TOTAL MISSOURI JURISDICTIONAL OPERATING REVENUES REPORTED ON	TATEMENT MUST MATCH THE THE COMPANY'S ANNUAL REPORT.
**IF REPORTING ZERO REVENUE, DO YOU WISH TO RETAIN YOUR OPERAT	TING CERTIFICATE?YESNO
ELECTRIC OPERATING REVENUE	8
GAS OPERATING REVENUE	\$
HEATING OPERATING REVENUE	\$
WATER OPERATING REVENUE	S
SEWER OPERATING REVENUE	\$
TELEPHONE/IVoIP OPERATING REVENUE	\$ NO MORE PHO
TOTAL	\$
	00100
	Millah 5
· · · · · · · · · · · · · · · · · · ·	(VV SCENE)
	SIGNATURE
State of Missour')	
County of St. Charles)	
Sounds of All Controls	
Sworn to and subscribed before me a Notary Public in and	for said County and State this
6 day of February, 2014.	v
DATE ANITA L. HARRETH YEAR	
Notary Public - Notary Seal	4
(SEAL) State of Missouri St Charles County	
My Commission Expires 08-07-2015	De Sheet
Commission # 11180927	70 2. MIV (1)
My commission expires 8-7-29/5	NOTARY PUBLIC
My commission expires $O (1-\alpha V)$	\

Mail one notarized copy of this statement to the Missouri Public Service Commission, Budget & Fiscal Services Department, P.O. Box 360, Jefferson City, Missouri 65102 or overnight delivery at 200 Madison Street, Jefferson City, MO 65101.

NO LATER THAN MARCH 31, 2014