

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

In the Matter of the Request for Cancellation	)	
of the Certificate of Service Authority	)	<b><u>File No. PD-2020-XXXX</u></b>
Granted to Coyote Call, 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 service authority to provide private payphone services of Coyote Call, Inc., (Company) and states:

1. On January 27, 1995, the Commission granted a certificate of service authority to the Company, then doing business as David Co., to provide private payphone services in Case No. TA-95-169.

2. On June 24, 2020, the Company notified the Commission that it no longer wished to retain its certificate to provide payphone services in Missouri in an email sent to Staff.

3. Pursuant to 20 CSR 4240-28.011(3) notice shall be provided to the Commission to cancel certification(s) or registration(s) previously granted by the Commission. Notice should comply with the following requirements: (A) The company should submit written notice to the commission, as in a letter, containing the following information: (1) a statement requesting cancellation of a company's certification or registration and citing the specific certificates of service authority and/or registrations; (2) If the company also has a currently effective tariff, then the letter should also request cancellation of the tariff; (B) The letter can be signed by a company official and does not

need to be signed or filed by an attorney; and (C) The letter should be electronically filed in EFIS.

4. The company properly submitted its indication to the Commission, bearing a request for cancellation of its authority to provide payphone services in Missouri and signed by an officer of the company in accordance with the Commission Rule. The Company does not have a currently effective tariff.

5. 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 certificate of service authority to provide private payphone services in Missouri of Coyote Call, Inc; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

**/s/ Whitney Payne**

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 25<sup>th</sup> day of June, 2020, to all counsel of record.

**/s/ Whitney Payne**