

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

In the Matter of the Discontinuance of	)	
the Certificate of Service Authority	)	<u>File No. PD-2022-</u>
for HKH Management Services, 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 pay telephone services of HKH Management Services, Inc., (Company) and states:

1. The Commission previously granted a certificate to the Company to provide private pay telephone services in Case No. PA-2005-0036 on August 23, 2004. The Company has no applicable tariff.

2. The Company noted on its Statement of Revenue for 2021, filed with the Commission, that it no longer wished to retain its operating certificate. The Company reported zero revenue.

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, Staff respectfully recommends the Commission cancel the certificate of service authority to provide private pay telephone services of HKH Management Services, Inc., and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne
Senior Counsel
Missouri Bar No. 64078
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)
whitney.payne@psc.mo.gov

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 12th day of August, 2021, to all counsel of record.

/s/Whitney Payne