

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the)	
Certificate of Service Authority to Provide)	<u>File No. LD-2016-0289</u>
Basic Local Telecommunications Services)	
of Charter Fiberlink-Missouri, LLC)	

Response of Charter Fiberlink-Missouri, LLC

COMES NOW, Charter Fiberlink-Missouri, LLC (“Charter Fiberlink”), through its undersigned counsel, and pursuant to 4 CSR 240-2.080(13) and the Missouri Public Service Commission’s (“Commission”) Order Establishing Time to Respond to Motion (“Order”),¹ hereby files this Response regarding Charter Fiberlink’s certificate of service authority (“Certificate”).² For the following reasons, Charter Fiberlink objects to the Staff Motion³ filed in connection with this matter and requests that the Commission not cancel the Certificate.

The Staff Motion states that, on June 3, 2015, Staff was notified that Charter Fiberlink was no longer providing service to its Missouri customers. In support of that statement, Staff cites to Charter Fiberlink’s Section 63.71 Application to the Federal Communications Commission, dated October 24, 2014, which sought authority to discontinue certain circuit switched local exchange and domestic long distance services to approximately 1,100 residential customers in Charter Fiberlink’s St. Charles County service area as a result of a planned network

¹ *In the Matter of the Cancellation of the Certificate of Service Authority to Provide Basic Local Telecommunications Services of Charter Fiberlink-Missouri LLC*, Order Establishing Time to Respond to Motion, File No. LD-2016-0289 (April 20, 2016).

² *In the Matter of the Application of Charter Fiberlink-Missouri, LLC, for a Certificate of Service Authority to Provide Basic Local Telecommunications Service and Intrastate Interexchange Services in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive*, Order Granting Certificate to Provide Basic Local Exchange and Interexchange Telecommunications Service, File No. TA-2001-346 (April 15, 2001).

³ *In the Matter of the Cancellation of the Certificate of Service Authority to Provide Basic Local Telecommunications Services of Charter Fiberlink-Missouri LLC*, Staff Motion, File No. LD-2016-0 (April 18, 2016).

upgrade in that area. The Staff Motion goes on to incorrectly conclude that Charter Fiberlink is no longer “providing telecommunications services in Missouri.”⁴

The purpose of this Response is to clarify that Charter Fiberlink continues to offer telecommunications services in Missouri under its Certificate and relevant tariffs. Specifically, Charter Fiberlink continues to offer (and has not withdrawn or otherwise discontinued): (i) retail basic business local exchange services to business customers; (ii) private line and data/Wide Area Network (non-switched) services to business, government and carrier customers; and (iii) wholesale interconnection services, including local interconnection services and switched access exchange services, to telecommunications carriers and/or other providers in the state. Charter Fiberlink’s filed and effective tariffs for these services are a matter of public record, and Charter Fiberlink requests that the Commission take administrative notice of the tariffs on file with it in connection with its consideration of this Response.

WHEREFORE, Charter Fiberlink requests that the Commission not grant the Staff Motion nor cancel the Certificate. Additionally, Charter Fiberlink requests that the Commission grant such other and further relief to which Charter Fiberlink might be entitled, including a hearing or the submission of a declaration, if necessary, to establish the facts asserted herein.

Respectfully submitted this 2nd day of May, 2016.



Kennard B. Woods
Missouri Bar No. 27977
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1700
Atlanta, Georgia 30346
770-399-9500 (Tel)
kwoods@fh2.com

Attorneys for Charter Fiberlink-Missouri, LLC

⁴ Staff Motion at 1.

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CERTIFICATE OF SERVICE

I hereby certify that, this 2nd day of May, 2016, copies of the foregoing have been
emailed to each of the persons listed below:

Colleen M. Dale
Senior Counsel
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
cully.dale@psc.mo.gov

Office of the Public Counsel
James Owen
200 Madison Street,
Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Dated this 2nd day of May, 2016.



Kennard B. Woods
Missouri Bar No. 27977
Friend, Hudak & Harris, LLP
Three Ravinia Drive
Suite 1700
Atlanta, Georgia 30346
770-399-9500 (Tel)
770-395-0000 (Fax)
kwoods@fh2.com

Attorneys for Charter Fiberlink-Missouri, LLC