

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

In the Matter of the Cancellation of the )	
Certificate of Service Authority and )	<b>File No. CD-2015-</b>
Tariff of Unity Telecom, LLC )	<u>Tariff No. YC-2013-0165</u>

**MOTION TO CANCEL CERTIFICATE OF  
SERVICE AUTHORITY AND TARIFF**

**COMES NOW** the Staff of the Missouri Public Service Commission and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of competitive basic local and interexchange telecommunications service authority in Missouri of Unity Telecom, LLC (“the Company”) and states as follows:

1. On October 16, 2012, the Commission last granted a certificate of competitive basic local telecommunications service authority under a new name to the Company in Case No. CN-2013-0121. It has an existing approved tariff, YC-2013-0165.
2. On January 27, 2015, the Company notified the Commission that it no longer wished to retain its certification to provide telecommunications services in Missouri (see BCES-2015-0413).
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 Unity Telecom, LLC to provide competitive basic local and interexchange telecommunications service in Missouri and its tariff.

Respectfully submitted,



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### **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 29<sup>th</sup> day of January, 2015.

