

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

In the Matter of the Cancellation of the)
Certificate of Service Authority and Tariff)
of US Telecom, Inc. d/b/a Sprint Services)

Case No. XD-2007-

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

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves that the Commission open a case and cancel US Telecom, Inc. d/b/a Sprint Services' certificate of service authority to provide intrastate interexchange telecommunications services in Missouri, as well as its tariff. In support of its Motion, Staff respectfully states as follows:

1. On July 3, 1990, the Missouri Public Service Commission (Commission) issued an order granting a certificate of service authority to provide intrastate interexchange telecommunications services to US Telecom, Inc. in Case No. TA-90-127, under the fictitious name "Sprint Services." The Commission also approved the company's tariff, P.S.C. MO TARIFF No. 1 in that case.

2. For many years, US Telecom, Inc. did not appear on the Commission's list of certificated companies. Accordingly, the Commission did not send any information to the company, such as annual reports or statements of revenue. The company's tariff did not appear in the Commission's electronic filing and information system until they were discovered recently and entered into the system, and the company's name was re-entered and reactivated at that time as well.

3. Subsequently, Staff of the Commission received a request from Ken Schiffman, Director, State Regulatory Affairs, a representative of US Telecom, Inc., to cancel the company's certificate. See Appendix A.

4. No formal complaints have been filed against the company since the commencement of the Electronic Filing and Information System.

5. The web site of the Office of the Missouri Secretary of State reports that US Telecom, Inc. is a Kansas corporation in good standing in Missouri.

6. Because US Telecom, Inc. has requested cancellation of its certificate and because it is not providing telecommunications service in Missouri, the Staff recommends that the Commission issue an order canceling the company's certificate.

7. The Commission has the authority to cancel a telecommunications corporation certificate pursuant to Section 392.410.5 RSMo (Supp. 2006), which provides:

“Any 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.”

However, 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. 1989).

8. This pleading is being served on the address provided by the company to the Commission via certified mail, as well as to its registered agent.

WHEREFORE, the Staff recommends the Commission cancel the certificate of service authority of US Telecom, Inc. d/b/a Sprint Services to provide intrastate interexchange services in Missouri, as well as its tariff, P.S.C. TARIFF MO No. 1.

Respectfully submitted,

/s/ David A. Meyer

David A. Meyer
Senior Counsel
Missouri Bar No. 46620

Attorney for the Staff of the
Missouri Public Service Commission
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed return receipt requested or electronically to all counsel of record as shown on the attached service list this 16th day of April 2007.

/s/ David A. Meyer

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

CSC-Lawyers Incorporating Service Company
Registered Agent for US Telecom, Inc.
221 Bolivar Street
Jefferson City, MO 65101

Ken Schiffman
US Telecom, Inc.
c/o Sprint
MS:KSOPHN212-2A303
6450 Sprint Pkwy
Overland Park, KS 66251

Meyer, David

Subject: FW: XD-2007-0 Sprint

From: Schiffman, Kenneth A [GA] [mailto:Kenneth.Schifman@sprint.com]

Sent: Friday, April 13, 2007 9:01 AM

To: Meyer, David

Cc: Thompson, Ann A [GA]

Subject: RE: XD-2007-0 Sprint Services

David,

Sprint Services wishes to cancel its certificate in Missouri. I am the regulatory attorney for Sprint Nextel Corporation and its subsidiaries for Missouri and have authority to make this request. The suggested pleading looks fine. Thank you and call me with any questions.

Ken Schiffman

Director

Sprint, State Regulatory Affairs

Central Region

v: 913.315.9783

m: 913.219.6529

kenneth.schifman@sprint.com

-----Original Message-----

Appendix A

4/13/2007

VERIFICATION

STATE OF MISSOURI)
)
COUNTY OF COLE)

Comes now Lisa Mahaney, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that the affiant has read the accompanying pleading, and that the facts therein are true and correct to the best of her knowledge.

Lisa Mahaney
Lisa Mahaney
Affiant

Subscribed and affirmed before me this 16th day of April 2007. I am commissioned as a notary public within the County of Cole, State of Missouri, and my commission expires on 9-23-2008.

Rosemary R. Robinson
NOTARY PUBLIC

