

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

In the Matter of the Revocation of the)	
Service Authority of Telesphere Networks)	<u>File No. TD-2017-0282</u>
LTD.)	

STAFF'S RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its *Response to Company* states:

1. On April 27, 2017, Staff filed a *Motion* opening Case No. TD-2017-0282, asking the Commission to cancel the authority of Telesphere Networks LTD, to provide interconnected voice-over internet protocol (iVoIP) services in Missouri. On May 22 Vonage Holdings Corp. sent its *Response* to Staff's *Motion* citing a Federal Communications Commission (FCC) order, which Vonage claims preempts traditional state company telephone regulations as applied to iVoIP services. Vonage, in an additional response, filed a letter June 12, 2017, stating that Telesphere was acquired by Vonage and merged into Vonage Business, Inc.

2. Staff believes that to the extent that Telesphere no longer exists, or provides iVoIP services, its authority should be cancelled. Vonage renewed its prior statement that state regulations do not apply to its operations because they are preempted by the FCC's order, which leads Staff to believe that Vonage does not believe it is responsible for paying the past-due assessments of Telesphere.

WHEREFORE, Staff respectfully recommends that since Vonage represents that Telesphere no longer offers iVoIP services in Missouri, the Commission revoke

Telesphere's authority to provide Interconnected Voice Over Internet Protocol services in Missouri; and grant such further relief as the Commission finds appropriate.

Respectfully submitted,

/s/ 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 15th day of June, 2017, to all counsel of record.

/s/ Whitney Payne