BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the)	File No. TD-2023-0275
Certificate of Corcom Communications, Inc.)	

MOTION TO AMEND STAFF'S MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and in support of its *Motion to Amend Staff's Motion to Cancel Certificate of Service Authority*, states as follows:

- 1. On March 1, 2023, Corcom Communications, Inc. (hereafter "Corcom" or the "Company") filed a request to cancel the certificate of service authority granted to it by the Missouri Public Service Commission ("Commission") to provide interexchange and non-switched local telecommunication service in Missouri.
- 2. In response to the Commission's March 2, 2023 Notice and Order Directing
 Staff to File a Recommendation, Staff filed a Motion to Cancel Certificate of Service
 Authority ("Motion to Cancel") on April 12, 2023.
- 3. That *Motion to Cancel* referenced Corcom's certificate of service authority previously granted to the Company in Case No. TA-2015-0342, and requested the Commission cancel the certificate.
- 4. Staff's *Motion to Cancel*, however, failed to include the tariff filed by Corcom, specifically Missouri Basic Private Lines Telecommunications Tariff, P.S.C. Mo. No. 1, in tracking number JX-2018-0119, effective March 21, 2018.
- 5. In order to correct the Staff's April 12, 2023 filing and complete the record, Staff requests permission to file an *Amended Motion to Cancel Certificate of Service*

Authority and Tariff in the above-captioned case. A copy of said motion is attached hereto and made a part hereof as Exhibit A.

6. This motion is made in the interest of justice and not with the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully moves for an order allowing it to file its Amended Motion to Cancel Certificate of Service Authority and Tariff in this case, which has been attached hereto and made a part hereof as Exhibit A; to accept the filing of said Amended Motion to Cancel Certificate of Service Authority and Tariff in this case; and for any other and further relief as is just and reasonable under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Attorney for Staff of the Missouri Public Service Commission

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 25th day of April, 2023, to all counsel of record.

/s/ Carolyn H. Kerr

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Cancellation of the)	File No. TD-2023-0275
Certificate of Corcom Communications, Inc.)	

AMENDED MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY AND TARIFF

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and moves for the Missouri Public Service Commission ("Commission") to cancel the certificate of service authority to provide interexchange and non-switched local exchange telecommunication service and accompanying tariff in the State of Missouri of Corcom Communications, Inc., ("Company") and states:

- 1. The Commission previously granted a certificate of service authority to the Company to provide interexchange and non-switched local exchange telecommunication service authority in Case No. TA-2015-0342, effective August 7, 2015.
- 2. The Company previously filed a Missouri Basic Private Lines Telecommunications Tariff, P.S.C. Mo. No. 1, in tracking number JX-2018-0119, effective March 21, 2018.
- 3. According to the Company's March 1, 2023 filing in the above-captioned cause, as of July 2022, the Company is no longer providing telecommunication services in Missouri or elsewhere, and all of the Company's clients "have been ported and offboarded to new providers so there is no lapse in service."
- 4. In addition, the Company is current with its annual reports and payment of annual fees assessed by the PSC.

- 5. The Commission has the authority to cancel a telecommunications certificate, or registration, pursuant to § 392.410.5, RSMo, 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."
- 6. 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 interexchange and non-switched local exchange telecommunication services and accompanying tariff of Corcom Communications, Inc., and grant such other and further relief as is just and reasonable under the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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/s/ Carolyn H. Kerr