BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Cancellation of Certificate of Service Authority and Cancellation of Tariff of Consumer Access	)))	**File No. XD-2011-0191**

STAFF MOTION FOR CANCELLATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Motion, states as follows:

1. On September 23, 1996, Consumer Access (the Company) was granted authority to provide interexchange telecommunications services in File No. TA-97-51. Its tariff remains in effect.

2. For the years 2008 and 2009, the Company reported zero Missouri jurisdictional revenue in its annual reports for those years, BMAR-2009-1234 and BMAR-2011-0851, respectively.

3. It is contrary to the public interest to allow interexchange telecommunications companies with no business in Missouri for over a year to retain their certificates. Companies that report zero revenue are not assessed any portion of the Commission's annual operating assessment. However, these companies consume a great deal of Staff time in recordkeeping and in monitoring compliance with reporting requirements, including annual reports, jurisdiction revenue statements, customer proprietary network information safeguards, and others. The costs of that recordkeeping and monitoring are passed on to the ratepayers of other companies that do have revenue in Missouri, which the Staff believes is unfair and contrary to the public interest. Moreover, the application process for interexchange telecommunications carriers is extremely streamlined, so that a company can reinstate its certificate with very little effort in a short period of time. The Staff believes that cancellation of certificates of interexchange telecommunications service authority will not materially harm those companies.

4. 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."

WHEREFORE, Staff moves that the Commission cancel the Certificate of Service Authority and tariff for Consumer Access.

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 29th day of December, 2010.