

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

In the Matter of the Cancellation of the Certificates)
of Service Authority of Main Street Telephone)
Company to Provide Competitive Interexchange and)
Nonswitched Local Exchange Telecommunications)
Services Within the State of Missouri)

File No. XD-2012- _____

MOTION TO CANCEL CERTIFICATES OF SERVICE AUTHORITY

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and moves for the Missouri Public Service Commission ("Commission") to cancel the certificates of service authority of Main Street Telephone Company ("MSTC" or "Company") and states as follows:

1. On September 15, 1998, the Commission granted MSTC certificates of service authority to provide competitive intrastate interexchange telecommunications services and nonswitched local exchange private line telecommunications services in the state of Missouri.

2. On August 31, 2011, the Commission received a Ceasing Operations Statement from MSTC that stated the Company has no customers in Missouri and requested the Commission cancel the Company's authority effective immediately. See Attachment A.

3. Because MSTC requested cancellation of its certificates and has no customers in Missouri, the Staff recommends that the Commission cancel the certificates.

4. The Commission has the authority to cancel a telecommunications certificate pursuant to Section 392.410.5, RSMo (Supp. 2010), 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.”

5. 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).

6. MSTC is current on its fiscal year 2012 assessment and submission of its calendar year 2010 annual report.

WHEREFORE, the Staff respectfully recommends that the Commission cancel the certificates of service authority and associated tariff of Main Street Telephone Company to provide competitive intrastate interexchange telecommunications services and nonswitched local exchange private line telecommunications services in the state of Missouri.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez
Associate Staff Counsel
Missouri Bar No. 59814

Attorney for the Staff of the
Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I hereby certify that I have provided a true and correct copy of the above pleading by prepaid First Class United States Postal Mail or electronic mail to: Patrick D. Crocker, Crocker & Crocker, Attorneys at Law, The Kalamazoo Building, 107 West Michigan Avenue, Fourth Floor, Kalamazoo, Michigan 49007; and the Office of the Public Counsel at opcservice@ded.mo.gov this 22nd day of November 2011.

/s/Jennifer Hernandez



August 17, 2011

Dale Hardy Roberts, Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Harry S. Truman Office Building
301 West High Street
Jefferson City, MO 65102

RECEIVED²

AUG 31 2011

*Records
Public Service Commission*

RE: Main Street Telephone Company

Dear Mr. Roberts:

We are the attorneys for Main Street Telephone Company (hereinafter "Main Street"). The Missouri Public Service Commission ("Commission") previously authorized Main Street to provide intrastate telecommunications services in Case No. TA-99-28. Main Street has no customers in Missouri. Main Street no longer intends to retain authority in the State of Missouri.

In accordance with Rule 4 CSR 240-3.560 Telecommunications Procedure for Ceasing Operations, we submit the following information regarding Main Street's withdrawal from the Missouri Public Service Commission as a long distance telecommunication provider:

1. A statement of reasons for ceasing or discontinuing service.

Main Street has no customers in Missouri. Main Street no longer intends to retain authority in the State of Missouri.

2. Date of Planned service cessation or discontinuance of service.

Upon approval of request for Deactivation.

3. Geographic areas affected by cessation or discontinuance of service.

Statewide

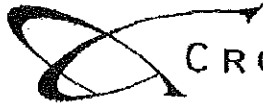
4. A brief description of the service(s) to be ceased or discontinued.

Long Distance Telecommunications

The Kalamazoo Building 107 West Michigan Avenue, Fourth Floor Kalamazoo, Michigan 49007

T 269.381.8893 F 269.381.4855

Attachment A



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ATTORNEYS AT LAW

5. A statement as to whether the company's tariff(s) and certificate shall remain in effect or be cancelled.

Main Street's tariffs shall be cancelled.

6. A statement that all affected customers have been notified at least thirty days prior to the cessation or discontinuance.

Main Street has no customers in Missouri.

7. A statement that all affected customers have been informed as to how they can select a new service provider.

Main Street has no customers in Missouri.

Accordingly, we respectfully request that the Commission cancel Main Street's authority effective immediately.

Enclosed is a duplicate of this letter. Please stamp the duplicate received and return same in the postage-paid envelope attached thereto.

Please forward any additional forms or requirements, correspondence, or questions to the undersigned.

Very truly yours,

CROCKER & CROCKER

Patrick D. Crocker

PDC/crg



CROCKER & CROCKER, P.C.
ATTORNEYS AT LAW

The Kalamazoo Building | 107 West Michigan Avenue, Fourth Floor | Kalamazoo, Michigan 49007



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He

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Law Judge
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