

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

In the Matter of Cancellation of the Certificate of)
Service Authority and Associated Tariff of)
Association Administrators, Inc. to Provide)
Interexchange Telecommunications Services in the) File No. XD-2014-
State of Missouri)
)

**MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY
AND ASSOCIATED TARIFF**

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 certificate of service authority and associated tariff of Association Administrators, Inc. (“Association Administrators” or “Company”). For its Motion, Staff respectfully states as follows:

1. On June 13, 1997, the Commission granted a certificate of service authority to Association Administrators to provide interexchange telecommunications services in the State of Missouri in Case No. TA-97-457 and approved the tariff assigned tracking number JX-2003-0095.

2. The Commission’s Order granting Association Administrators its certificate reminded the Company of its obligation to file an annual report pursuant to Section 392.210, RSMo.

3. Section 392.210.1 RSMo (2000) requires every telecommunications company to “...file with the commission an annual report at a time and covering the yearly period fixed by the commission,” and Rule 4 CSR 240-3.540(1) requires the report to be filed on or before April 15th of each year.

4. At the time of this filing, the Company has not submitted its calendar year 2012 annual report.

5. Despite Staff's attempt to contact Association Administrators, the Company has continued to be delinquent in the filing of its calendar year 2012 annual report.

6. Due to the Company's continued neglect of the Commission's statutes, rules and orders, Staff moves for the Commission to cancel Association Administrators' certificate of service authority and associated tariff.

7. 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."

8. 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).

9. If the Commission cancels Association Administrators' certificate of service authority, the Staff also recommends the Commission order the Company to provide notice to the Commission when transfer of its customers to another provider is complete.

WHEREFORE, Staff respectfully recommends the Commission give notice to Association Administrators, LLC as required by law and, after the opportunity for hearing, cancel their certificate of service authority and associated tariff to provide interexchange telecommunications services in the State of Missouri. Staff further requests that the Commission require the Company to notify the Commission when transfer of customers to another provider is complete.

Respectfully submitted,

/s/ Whitney Hampton

Whitney Hampton
Associate Staff Counsel
Missouri Bar No. 64886
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-6651 (Telephone)
(573) 751-9265 (Fax)
Whitney.Hampton@psc.mo.gov

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was mailed, electronically mailed, or hand-delivered to all parties to this cause on this 24th day of October, 2013.

/s/ Whitney Hampton