

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

In the Matter of the Cancellation of the	)	
Certificate of Service Authority of	)	<b><u>File No. XD-2020-0XXX</u></b>
Frontier Communications of America, Inc.	)	Tariff No. JX-2003-1864

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

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the certificate of interexchange service authority and applicable tariff of Frontier Communications of America, Inc., (Company) and states:

1. The Commission previously granted a certificate to the Company to provide intrastate interexchange service authority in Case No. TA-2002-692; approved its merger with Citizens Telecommunications, Inc., on May 27, 2003; and recognized its name change to Frontier Communications of America, Inc., at that time. The Company has an applicable tariff, No. JX-2003-1864.

2. The Company notified the Commission November 20, 2019, that it wished to voluntarily relinquish all of its authority in Missouri and cancel any applicable tariffs in a letter filed as Non Case Filing BCES-2020-0227 and attached here as Appendix A.

3. 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.”

4. 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 telecommunications services and applicable tariff in Missouri of Frontier Communications of America, Inc.

Respectfully submitted,

**/s/ Whitney Payne**

Whitney Payne

Senior Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

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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 2nd day of December, 2019, to all counsel of record.

**/s/Whitney Payne**

WILKINSON ) BARKER ) KNAUER ) LLP

RECEIVED<sup>3</sup>

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*Records  
Public Service Commission*

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November 19, 2019

**BY OVERNIGHT DELIVERY**

Morris Woodruff, Secretary  
Missouri Public Service Commission  
200 Madison Street, Suite 500  
Jefferson City, Missouri 65102-0360

*Re: Request for Cancellation of IXC Long Distance Reseller Authority and Withdrawal of  
Tariffs, Frontier Communications of America, Inc.  
Case No. XM-2003-0393*

Dear Secretary Woodruff:

By this letter, Frontier Communications of America, Inc. ("Frontier") respectfully requests that the Missouri Public Service Commission ("Commission") approve the cancellation of the above-referenced interexchange authority, granted on May 29, 2003, and the withdrawal of any related tariffs, to be effective on or before December 31, 2019.

The public convenience and necessity will not be adversely affected by the action described herein. Frontier no longer offers or provides any services to Missouri customers pursuant to the above-referenced authority, and therefore, no customer's service will be interrupted or disconnected. Frontier seeks to surrender this authorization to ensure that its records, and the Commission's, are fully up to date.

Please date-stamp and return the extra copy in the envelope provided. If you have any questions regarding this request, please contact the undersigned.

Respectfully submitted,



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Brian W. Murray

*Counsel to Frontier Communications of America, Inc.*