

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

In the Matter of the Cancellation of the Certificate of)	
Service Authority of CallCatchers, Inc. d/b/a)	<u>File No. XD-2020-X000</u>
Freedom Voice Systems)	

MOTION TO CANCEL CERTIFICATE OF SERVICE AUTHORITY

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 interconnected voice over internet protocol (IVoIP) registration of CallCatchers, Inc. d/b/a Freedom Voice Systems, (Company) and states:

1. The Commission previously granted a certificate to the Company to provide intrastate interexchange service authority in Case No. XA-2016-0351; and registration to provide IVoIP services in Case No. DA-2016-0352, on July 5, 2016.

2. The Company notified the Commission November 13, 2019, that it wished to voluntarily relinquish all of its authority in Missouri in a letter filed as Non Case Filing BCES-2020-0219 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 rescind the registration for IVoIP services in Missouri of CallCatchers, Inc. d/b/a Freedom Voice Systems.

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 20th day of November, 2019, to all counsel of record.

/s/Whitney Payne



November 6, 2019

VIA PRIORITY MAIL

John Van Eschen
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102

RECEIVED²

NOV 13 2019

*Records
Public Service Commission*

RE: CallCatchers, Inc. d/b/a FreedomVoice Systems – Request to Cancel Certificate of Service Authority and Withdraw Tariff by Letter

Dear Mr. Van Eschen,

Please find enclosed CallCatchers, Inc.'s (the "Company") Request to Voluntarily Cancel the Company's Certificate of Service Authority and Withdraw any Tariff by Letter.

Please acknowledge receipt of the Company's filing by date-stamping the copy of the Company's letter and returning it to me in the self-addressed, stamped envelope provided.

Any questions you may have regarding this filing should be directed to my attention at (703) 714-1313 or by email to jsm@commlawgroup.com. Thank you for your assistance in this matter.

Respectfully submitted,

Jonathan S. Marashlian
Counsel for FreedomVoice and GoDaddy

October 30, 2019

VIA ELECTRONIC SUBMISSION

Executive Secretary
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102

RE: *CallCatchers, Inc. d/b/a FreedomVoice Systems – Request to Cancel Certificate of Service Authority and Withdraw Tariff by Letter.*

Dear Sir or Madam,

CallCatchers, Inc. d/b/a FreedomVoice Systems ("FreedomVoice" or "the Company") hereby submits the Company's request to voluntarily surrender its Certificate of Service Authority ("Certificate" or "IXC License") and withdraw any Company tariff on record, effective as soon as possible. At the time of this filing, and to the best of its knowledge, FreedomVoice is in good standing before the Commission and current with its regulatory compliance obligations (including annual reports and payment of regulatory fees).

FreedomVoice was granted a Certificate to provide Interexchange Telecommunications services in Missouri on July 5, 2016 in File No. XA-2016-0351.

Later in 2016, the Company was acquired by Media Temple, Inc., an affiliate of GoDaddy.com LLC ("GoDaddy").¹ GoDaddy, an affiliate of FreedomVoice, is also licensed by this Commission to provide Interexchange Telecommunications services, pursuant to File No. XA-2017-0046. At the time of this filing, and to the best of its knowledge, GoDaddy is also in good standing and current with its regulatory compliance obligations.

Since the acquisition nearly three years ago, FreedomVoice has continued to operate as a wholly owned subsidiary of GoDaddy Inc. Throughout this period, FreedomVoice has provided service to consumers alongside the "GoDaddy" brand, as "FreedomVoice-A GoDaddy Company."

As the Commission was notified at the time of the merger, FreedomVoice assets and operations, including its IXC License, have been assigned to GoDaddy.com, LLC as part of an intracompany, operational reorganization that now renders FreedomVoice's IXC License superfluous and unnecessary.

As of September 1, 2019, GoDaddy and FreedomVoice completed the final step in the previously approved transaction by implementing associated accounting and operational changes whereby all revenue previously reported on the books of FreedomVoice are now being reflected in its affiliate GoDaddy's accounting. Likewise, as of September 1, 2019, GoDaddy began reporting all intrastate telecommunications revenue on a consolidated basis under its affiliate GoDaddy.com LLC. GoDaddy

¹ All three legal entities referenced herein (Media Temple, GoDaddy.com LLC, and FreedomVoice) are subsidiaries of GoDaddy Inc.

will therefore file future regulatory reports and remit associated regulatory fees in association with the IXC License issued by the Commission to GoDaddy.

The continued retention and maintenance of FreedomVoice's IXC License would impose unnecessary and duplicative administrative costs on GoDaddy, which the Company seeks to mitigate through this request to voluntarily surrender the IXC License issued to FreedomVoice.

The operational integration described above and the Company's request to voluntarily surrender FreedomVoice's IXC License (and withdraw any associated tariff) will not impact consumers. All services will continue to be provided in exactly the same manner as they were before September 1, 2019. Services will remain co-branded under the GoDaddy name and service mark. The changes triggering FreedomVoice's request to surrender its IXC License result from the assimilation of FreedomVoice's operations, systems and assets into GoDaddy and are reflective of internal bookkeeping consolidation (changes to accounting and reporting).

The public convenience and necessity will not be adversely affected by FreedomVoice's request to voluntarily surrender its IXC License, as there will be no perceptible change in customer experience from the accounting changes and operational assignments implemented as of September 1, 2019. Customers whose revenue had previously been recorded in FreedomVoice's books are now being recorded in GoDaddy's. And all revenue previously reported to the Commission by FreedomVoice will now be reported by GoDaddy.

To the best of its knowledge, the Company is current on all reporting and fee remittance obligations and, to the extent it is determined reports or fees are due prior to the cancellation of its IXC License, the Company is committed to ensuring prompt resolution.

For all these reasons, FreedomVoice hereby requests the Commission effect the cancellation and withdrawal of its now superfluous, redundant Certificate, and tariffs, if applicable, as soon as the Commission can take appropriate administrative action.

Any questions you may have regarding this filing should be directed to the attention of my attorney, Jonathan Marashlian, at (703) 714-1313 or by email to jsm@commlawgroup.com. Thank you for your assistance in this matter.

Respectfully submitted,



Gino Capozzi
Telecommunications Compliance Officer