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

In the Matter of the Cancellation of the	
Certificate of Service Authority and	File No. XD-2017-
Tariff of Alliance Group Services, Inc.	Tariff No. JX-2003-0085

## 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 in Missouri of Alliance Group Services, Inc. (Company) and states:

- 1. In October 24, 1998, the Commission granted a certificate of interexchange service authority in Case No. TA-99-57, to the Company. It has an existing approved tariff, JX-2003-0085.
- 2. On July 20, 2016, the Company notified the Commission that it no longer wished to retain its certification to provide telecommunications services in Missouri (see BCES-2017-0079).
- 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, the Staff respectfully recommends the Commission cancel the certificate of service authority to provide interexchange telecommunications service in Missouri and the tariff of Alliance Group Services, Inc.

Respectfully submitted,

## /s/ Whitney Payne

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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 4<sup>th</sup> day of May, 2017, to all counsel of record.

/s/Whitney Payne

107 W. Michigan Ave., Fourth Floor Kalamazoo, MI 49007 T (269) 381-8888 F (269) 381-4855



July 20, 2016

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 RECEIVED

AUG 03 2016

Records **Public Service Commission** 

RE: Alliance Group Services, Inc.

Dear Mr. Roberts:

Our firm handles compliance filings for Alliance Group Services, Inc. ("AGSI"). The Missouri Public Service Commission ("Commission") previously authorized AGSI to provide Intrastate Telecommunications Services beginning October 24, 1998. From this date on, Alliance Group Services, Inc. is no longer providing services to customers in the state and no longer intends to retain authority in the state of Missouri.

Accordingly we respectfully request that the Commission cancel AGSI's authority effective immediately.

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

Please forward any additional forms or requirements to the undersigned at (269) 381-8888 or contact@nationwideregulatorycompliance.com.

Very truly yours,

Nationwide Regulatory Compliance

Amanda R. Gucich

ARG/ev

Nationwide Regulatory Compliance