BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Notice for Verge Network) Solutions, Inc. to Cancel IVoIP Service)

STAFF RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves for the Missouri Public Service Commission (Commission) to cancel the registration to provide interconnected voice over internet protocol (IVoIP) services of Verge Network Solutions, Inc. ("Company") and states:

- 1. The Commission previously granted registration to the Company to provide IVoIP services in Case No. DA-2019-0256 on March 18, 2019.
- 2. The Company filed a letter with the Commission on October 19, 2022, stating that it no longer wished to retain its registration to provide IVoIP services in Missouri. It states that it does not have any Missouri customers as of September 30, 2022.
- 3. Pursuant to 20 CSR 4240-28.011(3) notice shall be provided to the Commission to cancel certification(s) or registration(s) previously granted by the Commission. Notice should comply with the following requirements: (A) The company should submit written notice to the commission, as in a letter, containing the following information: (1) a statement requesting cancellation of a company's certification or registration and citing the specific certificates of service authority and/or registrations; (2) If the company also has a currently effective tariff, then the letter should also request cancellation of the tariff; (B) The letter can be signed by a company official and does not

need to be signed or filed by an attorney; and (C) The letter should be electronically filed in EFIS.

- 4. The Company properly notified the Commission, in a letter filed in the electronic filing and information system (EFIS) and signed by a representative of the Company. The Company does not have a currently effective tariff.
- 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).

WHEREFORE, Staff respectfully recommends the Commission cancel the registration to provide interconnected voice over internet protocol services of Verge Network Solutions, Inc., and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Ron Irving

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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 November, 2022, to all counsel of record.

/s/ Ron Irving