

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

In the Matter of the Applications for Private Payphone Service Authority filed by:)	
)	
CruiseCom Enterprises, LLC)	File No. PA-2013-0469
)	
Vector Phones, LLC)	File No. PA-2013-0470
)	
Atlantis Link, LLC)	File No. PA-2013-0471
)	
OutDial Networks, LLC)	File No. PA-2013-0472
)	
EnduraVox, LLC)	File No. PA-2013-0473
)	
Robidoux Ringtone, LLC)	File No. PA-2013-0474
)	
PayCom Voice Enterprises, L.L.C.)	File No. PA-2013-0475
)	
InterVox Link, L.L.C.)	File No. PA-2013-0476
)	
Olympic Ventures, L.L.C.)	File No. PA-2013-0477
)	
Countdown Communication, LLC)	File No. PA-2013-0478
)	
Roaming Contact, LLC)	File No. PA-2013-0479
)	
Economy Communications, LLC)	File No. PA-2013-0480
)	
All Day Saver Phones, LLC)	File No. PA-2013-0481

**AT&T MISSOURI'S
APPLICATION TO INTERVENE**

AT&T Missouri,¹ respectfully seeks to intervene² in opposition to the above requests for authority to provide payphone service (collectively “Applicants”). Here, Applicants appear to be misusing the Commission’s certification process to artificially manufacture numerous sham entities to serve as additional “complainants” in Case No. TC-2005-0067 (to which the principals of the Applicants

¹ Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to as “AT&T Missouri.”

² AT&T Missouri makes this filing pursuant to 4 CSR 240-2.075 and the Missouri Public Service Commission’s (“Commission’s”) May 1, 2013, Notice of Applications for Authority to Provide Payphone Service.

are already parties through other entities they control) in attempt to evade the statutory and Commission requirement that complaints pertaining to rates must be signed by at least 25 purchasers or prospective purchasers of the service.³

In support of its Application, AT&T Missouri states:

1. AT&T Missouri is a Delaware Corporation duly authorized to conduct business in Missouri with its principal Missouri office at 909 Chestnut Street, St. Louis, Missouri 63101. AT&T Missouri is a “local exchange telecommunications company” and a “public utility,” and is duly authorized to provide “telecommunications service” within the State of Missouri as each of those phrases are defined in Section 386.020 RSMo (2000).

2. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Leo J. Bub
Robert J. Gryzmala
Attorneys for Southwestern Bell Telephone Company,
d/b/a AT&T Missouri
909 Chestnut Street, Room 3558
St. Louis, Missouri 63101

3. In this proceeding, Applicants ask the Commission to grant certificates of service authority to “install, operate, control, manage and maintain private pay telephone service in the State of Missouri.”⁴

4. AT&T Missouri seeks to intervene here because it has a direct interest in the Commission’s decision on Applicants’ certification request. In August 2004, a group of private pay telephone service providers -- including three companies that appear to be under common control with

³ Section 386.390.1 RSMo; MoPSC Rule 4 CSR 240-2.070(5).

⁴ See Applicants’ Applications for Certificate of Service Authority to Provide Private Pay Telephone Service in the State of Missouri, filed April 26, 2013.

- Atlantis Link, LLC File No. PA-2013-0471⁶

(b) Jim Nesselhauf, whom the Missouri Secretary of State lists as the registered agent for Case No. TC-2005-0067 Complainants ANJ Communications and Commercial Communication Services, L.L.C, (Mr. Nesselhauf is also the organizer of Commercial Communications Services, L.L.C.) now seeks certification for:

- OutDial Networks, LLC File No. PA-2013-0472
- EnduraVox, LLC File No. PA-2013-0473
- Robidoux Ringtone, LLC File No. PA-2013-0474
- PayCom Voice Enterprises, L.L.C. File No. PA-2013-0475⁷

The Secretary of State also lists Mr. Nesselhauf as the registered agent and organizer of QuickVox, LLC, which received Commission payphone certification in 2006⁸ and is another of the 17 entities seeking to join Case No. TC-2005-0067. The Commission should note that according to filings QuickVox made in response to a Staff certificate revocation motion, it appears that QuickVox has yet to offer payphone service in Missouri.⁹

(c) Terry Platt, whom the Missouri Secretary of State lists as the registered agent for Case No. TC-2005-0067 Complainant Tel Pro, Inc. and organizer of Case No. TC-2005-0067 Complainant Commercial Communication Services, L.L.C, now seeks certification for:

- InterVox Link, L.L.C. File No. PA-2013-0476
- Olympic Ventures, L.L.C. File No. PA-2013-0477

⁶ Copies of pages from the Missouri Secretary of State's website showing Mr. Schmidt's relationship to these entities are attached to this Application as Exhibit 1.

⁷ Copies of pages from the Missouri Secretary of State's website showing Mr. Nesselhauf's relationship to these entities are attached to this Application as Exhibit 2.

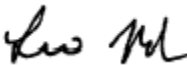
⁸ QuickVox L.L.C. received its certificate of service authority on September 29, 2006 in Case No. PA-2005-0095.

⁹ See QuickVox L.L.C.'s Objection to and Suggestions in Opposing Staff's Motion for Cancellation and Request for Hearing, filed April 26, 2011, in Case No. PD-2011-0314.

WHEREFORE, AT&T Missouri respectfully requests the Commission to grant this Application to Intervene.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY, D/B/A
AT&T MISSOURI

BY 
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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail or first class, postage prepaid U.S. Mail on May 15, 2013.


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