

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

In the Matter of the Cancellation of )  
Certificates of Service Authority )  
of COMTECH 21, LLC to Provide Intrastate )  
Interexchange Telecommunications Services; ) **File No. TD-2026-XXXX**  
to Provide Nonswitched Local Exchange )  
Telecommunications Services; and to Provide )  
Basic Local Telecommunications Services in )  
The State of Missouri )

**MOTION TO CANCEL CERTIFICATES 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 Certificates of Authority of COMTECH 21, LLC (“COMTECH”) to Provide Intrastate Interexchange Telecommunications Services; to Provide Nonswitched Local Exchange Telecommunications Services; and to Provide Basic Local Telecommunications Services (together “Certificates of Authority”) within the state of Missouri and states:

1. On July 20, 2001, in Commission File No. TA-2001-666, the Commission granted COMTECH Certificates of Service Authority to Provide Intrastate Interexchange Telecommunications Services and to Provide Nonswitched Local Exchange Telecommunications Services within the State of Missouri with the accompanying tariff P.S.C Mo. No. 1.

2. On May 16, 2004, in Commission File No. CA-2004-0393, the Commission granted COMTECH a Certificate of Service Authority to Provide Basic Local Telecommunications Services within the state of Missouri.

3. The Commission has the authority to cancel a telecommunications Certificate of Service Authority pursuant Section 392.410.5 RSMo, 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 Company has failed to file its calendar year 2023 and 2024 Annual Reports. The requirement of a telecommunications company to file an Annual Report is identified in Sections 392.210 and 392.390, RSMo and Commission Rule 20 CSR 4240-28.012(1)(A). The Company has also failed to file its 2023 and 2024 Statement of Revenue Reports as well as pay the Missouri Commission annual assessment for fiscal years 2025 and 2026.<sup>1</sup> The requirement to file a Statement of Revenue Report is identified in Section 386.370.5, RSMo and Commission Rule 20 CSR 4240-28.012(1)(B). The requirement to pay the Missouri Commission assessment is identified in Section 386.370, RSMo and Commission Rule 20 CSR 4240-28.012(2)(A).

5. Staff was informed by a former COMTECH representative, a Ms. Cyndy Nappi, that COMTECH has ceased doing business. Additionally, COMTECH fails to be legally, financially, and technically qualified to provide service due to its failure to comply with the above-mentioned statutes. As such, Staff respectfully recommends the Commission cancel COMTECH's Certificates of Authority.

6. The Commission need not hold a hearing, if, after proper notice and opportunity to intervene, no party requests a hearing.<sup>2</sup>

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<sup>1</sup> A company's assessment amount is determined by a factor identified on the commission's website and applied to a company's Missouri jurisdictional revenue identified on its Statement of Revenue Report. If a company fails to file a Statement of Revenue Report then the company's assessment is calculated using a Commission approved formula.

<sup>2</sup> *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 COMTECH 21, LLC's Certificates of Authority in Missouri.

Respectfully submitted,

/s/ Andrea B. Hansen

**Andrea B. Hansen**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 13<sup>th</sup> day of March, 2026.

/s/ Andrea B. Hansen