

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

Application of New London Telephone Company)	
for Approval of an Interconnection and Reciprocal)	
Compensation Agreement under the)	Case No. IO-2007-0070
Telecommunications Act of 1996.)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On August 15, 2006, New London Telephone Company (New London) filed an application with the Commission for approval of an interconnection agreement with Level 3 Communications, LLC, Missouri under the provisions of the federal Telecommunications Act of 1996.

2. Section 252(e) of the federal Telecommunications Act of 1996 provides that a State commission may only reject a negotiated agreement if it finds that the agreement discriminates against a telecommunications carrier not a party to the agreement or if the implementation of the agreement is not consistent with the public interest, convenience, and necessity.
47 U.S.C. § 252(e)

3. In the attached Memorandum, which is labeled Appendix A, the Staff states that the interconnection agreement does not discriminate against telecommunications carriers not a party to the agreement and is not against the public interest, convenience or necessity. The Staff notes that two pages of the Agreement are not numbered.

WHEREFORE, the Staff recommends that the Missouri Public Service Commission approve the interconnection agreement pursuant to the Act, direct New London to submit a

serially numbered copy of the agreement, and direct the parties to submit any modifications or amendments.

Respectfully submitted,

/s/ **William K. Haas**

William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11th day of September 2006.

/s/ William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. **IO-2007-0070**
Party: Level 3 Communications, LLC
Type of Carrier:
☐ ILEC
☒ CLEC
☐ Wireless

Party: New London Telephone Company
Type of Carrier:
☒ ILEC
☐ CLEC
☐ Wireless

From: Sherri Kohly, Telecommunications Department

William L. Voight 09/06/06 /s/ William K. Haas 09/06/06
Utility Operations Division/Date General Counsel Office/Date

Subject: Staff Recommendation for Approval of Interconnection Agreement or
Amendment to Interconnection Agreement

Date: September 8, 2006

Date Filed: August 15, 2006 **Staff Deadline:** September 18, 2006

The Telecommunications Department Staff (Staff) recommends the Parties be granted approval of the submitted:

- ☒ Interconnection Agreement
☐ Amendment not previously approved

The parties submitted the proposed Agreement or Amendment to the Missouri Public Service Commission (Commission) pursuant to the terms of the Telecommunications Act of 1996 (Act). Staff has reviewed the proposed Agreement and believes it meets the limited requirements of the Act. Specifically, the Agreement: 1) does not discriminate against telecommunications carriers not party to the Agreement and 2) is not against the public interest, convenience or necessity. Staff recommends the Commission direct the Parties to submit any modifications or amendments to the Commission.

☒ The applicants have not submitted a serially numbered copy of the Agreement or Amendment. Staff recommends the Commission direct the Parties to submit a serially numbered copy of the Agreement or Amendment. **(Two of the pages within the Agreement are not numbered).**

☐ Staff has a serially numbered copy of the Agreement or Amendment.

Additional Interconnection Agreement or Amendment Review Items

☒ No applications to intervene filed.

☒ Agreement or Amendment signed by both Parties.

Additional recommendations or special considerations (if any):

The parties have submitted this negotiated Agreement pursuant to Section 252 of the Telecommunications Act of 1996, and characterized the Agreement as a “Traffic Exchange Agreement”. Staff can find no reference in Section 252 to “Traffic Exchange Agreement”. Consequently, Staff recommends the Commission issue an Order approving an “Interconnection Agreement”.

☒ The Companies are not delinquent in filing an annual report and paying the PSC assessment.

☐ The Company is delinquent. Staff recommends the Commission grant the requested relief/action on the condition the applicant corrects the delinquency. The applicant should be instructed to make the appropriate filing in this case after it has corrected the delinquency.

(☐ No annual report ☐ Unpaid PSC assessment. Amount owed:)

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


Application of New London Telephone)
Company for Approval of a Traffic)
Exchange Agreement under the)
Telecommunications Act of 1996)

Case No. **TO-2007-0070**

AFFIDAVIT OF SHERRI L. KOHLY

STATE OF MISSOURI)
) ss:
COUNTY OF COLE)

Sherri L. Kohly, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that she has participated in the preparation of the accompanying Memorandum, and that the facts therein are true and correct to the best of her knowledge and belief.



Sherri L. Kohly

Subscribed and affirmed before me this 7th day of September 2006

I am commissioned as a notary public within the County of Cole, State of Missouri

and my commission expires on September 11, 2006



NOTARY PUBLIC

