

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

In the Matter of the Application of Southwestern )  
Bell Telephone Company, d/b/a AT&T Missouri, )  
For Approval of a Structure Access Agreement )  
Under the Telecommunications Act of 1996 )

**File No. IK-2018-0055**

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and submits its Recommendation as follows:

1. On August 18, 2017, Southwestern Bell Telephone Company d/b/a AT&T Missouri, ("AT&T") filed with the Missouri Public Service Commission its *Application for Approval of a Structure Access Agreement* regarding a negotiated structure access agreement between itself and T-Mobile Central, LLC. Even though this is the adoption of a structure access agreement, the process for approval is the same as the adoption of an interconnection agreement.

2. 47 USC 252(e)(2) provides that a state commission may only reject an agreement adopted by negotiation if the agreement discriminates against a telecommunications carrier not a party to it or its implementation is not consistent with the public interest, convenience, and necessity.

3. In lieu of a Memorandum, Staff hereby states that the Structure Access Agreement does not discriminate against telecommunications carriers not parties to it, nor is its implementation inconsistent with the public interest, convenience or necessity. A copy of the Agreement was filed with the Application. AT&T is certificated with the

Commission as an incumbent local exchange and interexchange telecommunications company. T-Mobile Central, LLC, is not certificated with the Commission.

**WHEREFORE**, Staff recommends the Commission approve the *Application* and direct the parties to submit to the Commission any modifications or amendments to the Structure Access Agreement; and grant such other and further relief as the Commission sees fit.

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 25th day of September, 2017, to all counsel of record.

**/s/Whitney Payne**