

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

In the Matter of the Application for Approval of an	)	
Interconnection Agreement between Citizens	)	
Telephone Company of Higginsville, Missouri, Inc.,	)	<b><u>File No. IK-2022-0051</u></b>
and Level 3 Communications, LLC	)	

**STAFF RECOMMENDATION**

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

1. On August 25, 2021, Citizens Telephone Company of Higginsville, Missouri, Inc., filed with the Missouri Public Service Commission its *Application for Approval of Interconnection Agreement and Request for Waiver of 20 CSR 4240-4.017* between itself and Level 3 Communications, LLC.

2. 47 USC 252(e)(2) provides that a state commission may only reject an interconnection 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 Interconnection 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 Amendment was filed with the *Application*. Citizens Telephone Company of Higginsville, Missouri, Inc., is certificated with the Commission as an incumbent local exchange carrier. Level 3 Communications, LLC, is certificated with the Commission as a competitive local exchange and interexchange carrier.

**WHEREFORE**, Staff recommends the Commission approve the *Application* and grant such other and further relief as the Commission finds appropriate in the circumstances.

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 24<sup>th</sup> day of September, 2021, to all counsel of record.

**/s/ Whitney Payne**