

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Application of Grand River Mutual)
Telephone Corporation for Approval) Case No. _____
of an Interconnection Agreement)

**APPLICATION OF GRAND RIVER MUTUAL TELEPHONE CORPORATION
FOR APPROVAL OF AN INTERCONNECTION AGREEMENT**

COMES NOW Grand River Mutual Telephone Corporation (“Grand River”), pursuant to Commission rule 20 CSR 4240-28.013(2) and hereby files this Application for Approval of an Interconnection Agreement between Grand River and Teleport Communications America, LLC (“TCA”) under the Telecommunications Act of 1996 (“the Act”). In support of this Application, Grand River states to the Missouri Public Service Commission (“Commission”) as follows:

I. AGREEMENT REACHED

1. Grand River is a local exchange carrier operating in Missouri. Grand River is a Missouri corporation in good standing with the Missouri Secretary of State. Grand River’s annual reports and assessment fees are not overdue.

2. On May 7, 2020, after good faith negotiations, Grand River and TCA executed an Interconnection Agreement (“the Agreement”) for the state of Missouri pursuant to the terms of the Federal Act (*see* Agreement, Attachment I). Pursuant to Commission rule 20 CSR 4240-28.013(2) and the Act, Grand River hereby submits this Agreement for approval by the Commission.

3. The Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement consists of forty-seven

(47) pages, including attachments. There are no outstanding issues between Grand River and TCA that need the assistance of mediation or arbitration.

II. REQUEST FOR APPROVAL

4. Grand River seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act and Missouri law. Grand River represents that the implementation of this negotiated and executed Agreement complies fully with Missouri law and Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. Grand River respectfully requests that the Commission grant expeditious approval of this Agreement, without change, suspension or delay in its implementation. This is a bilateral agreement, reached as a result of negotiations and compromise between the parties. Correspondence, orders and decisions in this matter should be addressed to:

Ron Hinds, CEO
Grand River Mutual Telephone Corporation
1001 Kentucky Street
Princeton, MO 64673
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Teleport Communications America
David Handal, Director Sourcing Operations
1 AT&T Way, Room 4A123
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Dan Le, Lead Carrier Relations Mgr.
1 AT&T Way, Room 4A105
Bedminster, NJ 07921
Phone: (908) 234-4354
danle@att.com

III. COMMISSION AUTHORITY

5. Under the Act, the Commission has the authority to grant the relief requested by Grand River. Specifically, Section 252(a) of the Act provides:

(a) AGREEMENTS ARRIVED AT THROUGH NEGOTIATIONS

- (1) VOLUNTARY NEGOTIATIONS.** – Upon receiving a request for interconnection, services, or network elements pursuant to section 251, an incumbent local exchange carrier may negotiate and enter into a binding agreement with the requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of section 251. The agreement shall include a detailed schedule of itemized charges for interconnection and each service or network element included in the agreement. The agreement, including any interconnection agreement negotiated before the date of enactment of the Telecommunications Act of 1996, shall be submitted to the State commission under subsection (e) of this section.

IV. STANDARD OF REVIEW

Under Section 252 of the Act, the Commission has the authority to approve an agreement negotiated between an incumbent local exchange company (ILEC) and other telecommunications carriers. The Commission may only reject an agreement if the agreement is discriminatory to a nonparty or is inconsistent with the public interest, convenience, and necessity. Section 252(e)(2) of the Act provides as follows:

GROUND FOR REJECTION. – The State Commission may only reject –

- (A) an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that –
- (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
 - (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity;

Grand River states that the Agreement does not discriminate against a telecommunications carrier not a party to the Agreement. Grand River further states that implementation of the Agreement is consistent with the public interest, convenience, and necessity.

V. CONCLUSION

WHEREFORE, Grand River respectfully requests the Commission to issue an Order that:

- (1) approves expeditiously the Interconnection Agreement between Grand River and TCA, and
- (2) grants such other relief as is reasonable in the circumstances.

Respectfully submitted,

By /s/ Brian T. McCartney
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Attorneys for Grand River Mutual
Telephone Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served to the following parties on this 14th day of May, 2020:

General Counsel
Missouri Public Service Commission
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Teleport Communications America
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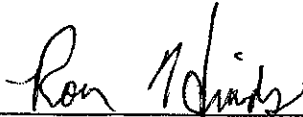
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Phone: (908) 234-4354
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/s/ Brian T. McCartney

VERIFICATION

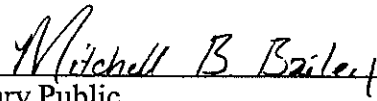
COUNTY OF MERCER)
) ss.
STATE OF MISSOURI)

I, Ron Hinds, being duly sworn upon my oath, state that I am over twenty-one, sound of mind, and am authorized to act on behalf of Grand River Mutual Telephone Corporation regarding the foregoing document. I have read it and verify that the facts contained in it are true and correct according to the best of my knowledge, information and belief.



Ron Hinds

Sworn and subscribed to before me this 12th day of May, 2020.



Notary Public

