

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

In the Matter of the Application for )  
Approval of an Amendment to the )  
Interconnection Agreement Between )  
Embarq Missouri, Inc. d/b/a CenturyLink )  
and Neutral Tandem-Missouri, LLC )  
Pursuant to Sections 251 and 252 of the )  
Telecommunications Act of 1996 )

**File No. TK-2018-0136**

**STAFF RECOMMENDATION**

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

1. On November 15, 2017, Embarq Missouri, Inc. d/b/a CenturyLink (“CenturyLink”) filed an application with the Commission for approval of an amendment (“Amendment”) to an interconnection agreement (“Agreement”) with Neutral Tandem-Missouri, LLC (“Neutral Tandem”) under the provisions of the federal Telecommunications Act of 1996. CenturyLink states that the Agreement complies with Section 252(e) of the Act in that it is consistent with public interest, convenience and necessity, and not discriminatory to nonparty carriers. CenturyLink is a certificated Incumbent Local Exchange Telecommunications Company; Neutral Tandem is a certificated Competitive Local Exchange and Interexchange Telecommunications Company.

2. As CenturyLink states in its application for approval of the Amendment, the application for approval of the Agreement was filed and is pending before the Commission in TK-2018-0083; a copy of the Agreement was provided in that case. Staff filed its recommendation in that case on October 26, 2017, and recommended “the

Commission approve the Application and direct the parties to submit to the Commission any subsequent modifications or amendments to the Interconnection Agreement.”

3. 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 the agreement or the agreement’s implementation is not consistent with the public interest, convenience, and necessity.

4. In lieu of a Memorandum, Staff herein states that the Amendment does not discriminate against telecommunications carriers not parties to it, nor is its implementation inconsistent with the public interest, convenience or necessity.

**WHEREFORE**, Staff recommends the Commission, contingent upon approval of the Agreement in TK-2018-0083, approve the Amendment, and direct the parties to submit to the Commission any subsequent modifications or amendments to the Amendment.

Respectfully submitted,

**/s/ Alexandra L. Klaus**

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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 parties and/or counsel of record on this 29<sup>th</sup> day of November, 2017.

**/s/ Alexandra L. Klaus**