

**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 an Amendment to an Interconnection	)	<b><u>File No. TK-2023-0147</u></b>
Agreement Under the Telecommunications Act of	)	
1996	)	

**STAFF RECOMMENDATION**

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

1. On November 2, 2022,<sup>1</sup> Southwestern Bell Telephone Company, d/b/a AT&T Missouri ("AT&T Missouri") filed with the Missouri Public Service Commission its amendment to the current interconnect agreement between AT&T and Level 3 Communications, LLC. ("agreement").

2. On November 8, the Commission issued its Order Directing Notice, Setting Intervention Deadline, and Making Level 3 Communications, LLC a party. The Commission set an intervention date of November 23. No party has intervened, and Level 3 Communications, LLC has filed no pleading.

3. On November 8, the Commission also ordered the Commission Staff to file a recommendation no later than December 8 advising either approval or rejection of the agreement.

4. The Act provides that an interconnection or resale agreement must be approved unless the state commission finds that the agreement discriminates against a

---

<sup>1</sup> All date references will be to 2022 unless otherwise stated.

telecommunications carrier not a party to the agreement, or that implementation of the agreement is not consistent with the public interest, convenience, and necessity.<sup>2</sup> Section 252(e)(4) of the Act provides that if the Commission has not acted to approve or reject an agreement within 90 days after submission, the agreement shall be deemed approved.

5. In lieu of a Memorandum, Staff hereby states that the Amendment to 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. Southwestern Bell Telephone Company, d/b/a AT&T Missouri is certificated with the Commission as an incumbent local exchange 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/ Paul T. Graham

Senior Counsel Missouri Bar No. 30416  
P. O. Box 360 Jefferson City, MO 65102  
(573) 522-8459 (Telephone)  
(573) 751-9285 (Fax)  
[Paul.graham@psc.mo](mailto:Paul.graham@psc.mo).

Attorney for the Staff of the Missouri Public  
Service Commission

---

<sup>2</sup> 47 U.S.C. § 252(e)

**CERTIFICATE OF SERVICE**

The undersigned certifies by his signature below that on December 8, 2022, he filed the above document in the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham