

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

In the Matter of the Application for Approval of the	)	
Resale Agreement by and Between Otelco	)	
Telecommunications, LLC and CenturyTel of Missouri,	)	<b><u>File No. TK-2018-0081</u></b>
Missouri, LLC d/b/a CenturyLink, and Spectra	)	
Communications Group, LLC d/b/a CenturyLink	)	
Pursuant to Sections 251 and 252 of the	)	
Telecommunications Act of 1996	)	

**STAFF RECOMMENDATION**

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

1. On September 22, 2017, CenturyTel of Missouri, LLC, d/b/a CenturyLink ("CenturyLink") filed with the Missouri Public Service Commission its Application for Approval of a Negotiated Resale Agreement between it and Otelco Telecommunications, LLC ("Otelco").

2. 47 USC 252(e)(2) provides that a state commission may only reject an interconnection or resale 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 Agreement was filed with the Application. CenturyLink is certificated with the Commission as an incumbent local exchange telecommunications company. Otelco is a competitive local exchange and interexchange carrier.

**WHEREFORE,** Staff recommends the Commission approve the Application and direct the parties to submit to the Commission any modifications or amendments to the Interconnection Agreement.

Respectfully submitted,

**/s/ Casi Aslin**

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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 counsel of record this 25<sup>th</sup> day of October, 2017.

**/s/ Casi Aslin**