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,)	File No. TK-2018-0088
for approval of an amendment to an Interconnection)	
Agreement under 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 27, 2017, Southwestern Bell Telephone Company, d/b/a AT&T Missouri ("AT&T") filed with the Missouri Public Service Commission its Application for Approval of an Amendment to an Interconnection Agreement executed between it and Comcast Phone of Missouri and Comcast Digital Phone ("Comcast").
- 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 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. A copy of the Amendment was filed with the Application. AT&T is certificated with the Commission as an incumbent local exchange and interexchange telecommunications company. Comcast is certificated as a competitive local exchange telecommunications company, an interconnected voice over internet

protocol provider, a video service provider and an interexchange telecommunications company.

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/ Whitney Payne

Whitney Payne
Legal Counsel
Missouri Bar No. 64078
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
whitney.payne@psc.mo.gov

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 2nd day of November, 2017, to all counsel of record.

/s/ Whitney Payne