

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

In the Matter of Staff’s Review of the Commission’s) File No. TW-2018-0098
Chapter 28 Rules)

VERIZON’S COMMENTS

Verizon¹ submits these comments pursuant to the October 18, 2017 “Order Opening a Working Case Regarding Staff’s Review of Its Chapter 28 Rules Regarding Telecommunications, IVoIP, Video Services and Its Chapter 37 Rules Regarding Number Pooling and Number Conservation Efforts” and setting an October 23, 2017 date for comments on Staff’s proposed rules.

While reserving its right to file additional comments during the formal rulemaking process, at this time, Verizon offers one suggestion pertaining to proposed rules 4 CSR 240-28.020(1)(B) (governing applications for certificates of service authority and registrations) and 4 CSR 240-28.040(2)(A) (addressing applications for approval of interconnection agreements or amendments that were not previously approved). Both of these proposed rules would require applicants to hire licensed Missouri counsel to make routine submissions that could simply be signed by an authorized company representative, as permitted for other filings covered by 4 CSR 240-28.020(2)(A) and (3), and 4 CSR 240-28.040(2)(B). There is no need to compel carriers to bear the unnecessary cost of retaining counsel to file applications for certificates, registrations, and approval of interconnection agreements and amendments when an authorized company representative could sign the documents, as is the process in most states.

¹ “Verizon” refers collectively to MCImetro Access Transmission Services Corp. d/b/a Verizon Access Transmission Services; MCI Communications Services, Inc. d/b/a Verizon Business Services; TTI National, Inc., Verizon Long Distance LLC; Verizon Select Solutions, Inc.; and XO Communications Services, LLC.

Moreover, it is inconsistent with the streamlining and cost reduction goals of Executive Order 17-03 (January 10, 2017) (“EO 17-03”) to require businesses to incur unnecessary expenditures of attorneys’ fees. EO 17-03’s stated intent is to limit Missouri regulations to those that are “efficient, effective, and necessary,” so as not to “reduce jobs, stifle entrepreneurship, limit innovation, or impose costs far in excess of their benefits” or “unduly and adversely affect Missouri citizens or customers of the State, or the competitive environment in Missouri” through “ineffective, unnecessary, or unduly burdensome” rules. There is no reason to require licensed Missouri counsel to file routine submissions such as those addressed in proposed 4 CSR 240-28.020(1)(B) and 4 CSR 240-28.040(2)(A).

Verizon suggests that the Commission modify both rules to eliminate the requirement for the signature of a licensed Missouri attorney and replace it with the signature of an authorized company representative, as shown below:

4 CSR 240-28.020 Certificate of Service Authority and/or Registration. This rule identifies information relevant to obtaining a certificate of service authority and/or registration.

PURPOSE: This rule streamlines requirements previously contained in 4 CSR 240-28.030.

(1) Authorization to obtain a certificate of service authority or registration may be obtained by submitting an application form to the commission. Authorization is limited to the service area specified by the company’s initial application; however, a company’s service area can later be altered by submitting a Notice of Change form.

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(B) An ~~attorney licensed to practice law in Missouri~~ authorized company representative must file the application form or the Notice of Change form.

4 CSR 240-28.040 Tariff Filings and Interconnection Agreements. This rule identifies guidelines for filing tariffs and interconnection agreements.

PURPOSE: This rule streamlines requirements previously contained in 4 CSR 240-28.070 and 28.080.

(1) Maintaining a tariff with the commission is discretionary for retail telecommunications services. The commission's website contains information about tariff format as well as the process for cancelling and no longer maintaining a tariff.

(2) Interconnection agreements are filed and maintained in EFIS as identified below. Additional filing instructions may be found on the commission's website.

(A) Interconnection agreement or amendment to an interconnection agreement not previously approved shall be submitted in an application signed by an **attorney-licensed to practice law in Missouri authorized company representative**.

These changes will reduce business' costs without impeding Commission functions.

Dated: October 23, 2017

**MCImetro Access Transmission Services Corp.
d/b/a Verizon Access Transmission Services;
MCI Communications Services, Inc. d/b/a
Verizon Business Services; TTI National, Inc.;
Verizon Long Distance LLC; Verizon Select
Solutions, Inc.; and XO Communications
Services, LLC**

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