

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

Application of New London Telephone )  
Company, Orchard Farm Telephone )  
Company, and Stoutland Telephone Company )  
for Approval of a Wireless Traffic Exchange )  
Agreement under the Telecommunications )  
Act of 1996 )

Case No. TO-2006-0324

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its recommendation respectfully states:

1. In the attached Memorandum, labeled Appendix A, the Staff recommends that the Missouri Public Service Commission grant approval of the Agreement characterized as a “Wireless Traffic Exchange Agreement” between New London Telephone Company, Orchard Farm Telephone Company, and Stoutland Telephone Company (“the TDS Companies”); and T-Mobile USA, Inc. (the “Agreement”). The Agreement was filed by the TDS Companies under the provisions of the federal Telecommunications Act of 1996.

2. The terms of the Agreement do not discriminate against telecommunications carriers not a party to the Agreement and are not against the public interest, convenience or necessity. Pursuant to 47 U.S.C. §252(e), the Commission is to approve a negotiated interconnection agreement unless the terms of the agreement discriminate against a telecommunications carrier not a party to the agreement, or implementation of the agreement or any portion thereof is inconsistent with the public interest, convenience, or necessity.

3. Staff further states that the TDS Companies submitted this negotiated Agreement pursuant to Section 252 of the Telecommunications Act of 1996, and characterized the

Agreement as a “Wireless Traffic Exchange Agreement.” Staff can find no reference in Section 252 to “Wireless Traffic Exchange Agreement.” Consequently, Staff recommends the Commission issue an Order approving a wireless “interconnection agreement” and not an Order approving “Wireless Traffic Exchange Agreement.”

**WHEREFORE**, because the terms of the Agreement satisfy the standard set forth in 47 U.S.C. §252(e), Staff recommends the Commission approve the Agreement as a Wireless Interconnection Agreement and direct the parties to submit any future modifications or amendments to the Agreement to the Commission for approval.

Respectfully submitted,

**/s/ David A. Meyer**

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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 6<sup>th</sup> day of March 2006.

**/s/ David A. Meyer**