



CenturyLink™

Linda K. Gardner  
Associate General Counsel  
5454 West 110<sup>th</sup> Street  
Overland Park, Kansas 66211  
913-345-6193

September 30, 2011

**FILED**

OCT 03 2011

**Missouri Public  
Service Commission**

Office of the Secretary  
ATTN: Data Center  
Missouri Public Service Commission  
P O. Box 360  
200 Madison Street, Suite 650  
Jefferson City, Missouri 65102

Re: Application for Approval of a Wireline E911 Network Services Commercial Interconnection Agreement between Intrado Communications Inc. and Embarq Missouri, Inc. d/b/a CenturyLink, CenturyTel of 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

Dear Sir or Madam:

Please accept for filing with the Commission the Application of Embarq Missouri, Inc. d/b/a CenturyLink, CenturyTel of Missouri, LLC d/b/a CenturyLink and Spectra Communications Group, LLC d/b/a CenturyLink (collectively "CenturyLink") for Approval of a Wireline E911 Network Services Commercial Interconnection Agreement. CenturyLink requests the Commission approve the Agreement between the parties according to its procedures.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Linda Gardner

LKG:kmm  
Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED

OCT 03 2011

Missouri Public  
Service Commission

In Re: Wireline E911 Network Services )  
Commercial Interconnection Agreement )  
Between Intrado Communications, Inc. and )  
Embarq Missouri, Inc. d/b/a CenturyLink, )  
CenturyTel of 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. )

Case No. \_\_\_\_\_

**APPLICATION OF EMBARQ MISSOURI, INC. D/B/A CENTURYLINK,  
CENTURYTEL OF MISSOURI, LLC D/B/A CENTURYLINK AND SPECTRA  
COMMUNICATIONS GROUP, LLC D/B/A CENTURYLINK FOR APPROVAL  
OF A WIRELINE E911 NETWORK SERVICES COMMERCIAL AGREEMENT**

COME NOW, Embarq Missouri, Inc. d/b/a CenturyLink, CenturyTel of Missouri, LLC d/b/a CenturyLink and Spectra Communications Group, LLC d/b/a CenturyLink (collectively "CenturyLink") and file this Application for Approval of a Wireline E911 Network Services Commercial Interconnection Agreement ("Agreement") between Intrado Communications Inc. ("Intrado") and CenturyLink pursuant to the Telecommunications Act of 1996 (the "Federal Act"). In support of its application, CenturyLink states the following:

**I. APPLICANT**

CenturyLink is a Missouri corporation with offices at 319 Madison, Jefferson City, Missouri 65102. CenturyLink is authorized to transact business within the State of Missouri and is authorized by the Missouri Public Service Commission ("Commission") to provide basic local and interexchange telecommunications service within the state.

CenturyLink was originally incorporated in Missouri in 1929 as The United Telephone Company. A restatement of its certification was received in Case No. TA-88-87. CenturyLink has received all necessary Commission and Secretary of State approvals for subsequent name changes and is a corporation in good standing in the State of Missouri.

Evidence of proper name registrations was most recently provided to this Commission in Case No. TO-97-53 (Re: United Telephone Company of Missouri's Adoption Notice Designed to Change the Company's Name to United Telephone Company of Missouri d/b/a Sprint), Case No. TO-98-107-(Application of United Telephone Company of Missouri d/b/a Sprint for Approval of Name Change to Sprint Missouri, Inc.), Case No. TN-2006-0416 (Re Name Change Request of Sprint Missouri, Inc., to Embarq Missouri, Inc., d/b/a Embarq) and Case No. TN-2010-0086 (Fictitious Name Change Request of Embarq Missouri, Inc. d/b/a Embarq to Embarq Missouri, Inc. d/b/a CenturyLink). CenturyLink requests that the information in those cases be incorporated herein by reference. To CenturyLink's knowledge there are no overdue assessments or annual reports nor are there any pending actions or final unsatisfied judgments or decisions against it involving customer service or rates occurring within the last three years.

## **II. INTERCONNECTION AND RESALE AGREEMENT**

CenturyLink presents to the Commission its application pursuant to the terms of the Federal Act. CenturyLink and Intrado entered into a Wireline E911 Network Services Commercial Interconnection Agreement dated July 22, 2011 (Attachment 1). There are no outstanding issues related to the Agreement between the parties that require the assistance of mediation or arbitration.

## **III. STANDARD FOR REVIEW**

The statutory standard of review under Section 252(e) of the Act states:



(e) Approval by State Commission

- (1) Approval Required. Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the state commission. A State commission to which an agreement is submitted to shall approve or reject the agreement, with written findings as to any deficiencies.
- (2) under subsection (a) if it finds Grounds for Rejection. The State commission may only reject.
  - (A) an agreement (or any portion thereof) adopted by negotiation that:
    - (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement, or
    - (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity; or...

CenturyLink further states that the Agreement is consistent with the public interest, convenience and necessity in that it allows for full and fair competition and greater choice for the consumer. The Agreement does not discriminate against other carriers who are not a party to the Agreement because the terms of the Agreement are equally available to any other carrier.

**IV. REQUEST FOR APPROVAL**

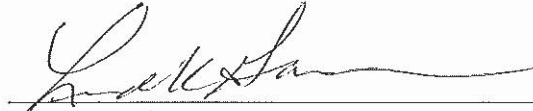
CenturyLink seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. CenturyLink and Intrado believe that the implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, provides interconnectivity, and increases customer choices for telecommunications services.

CenturyLink and Intrado respectfully request that the Commission grant approval of the Agreement, without change, suspension or other delay in its implementation.

V. CONCLUSION

WHEREFORE, for the foregoing reasons, CenturyLink requests that the Commission approve the Wireline E911 Network Services Commercial Interconnection Agreement between CenturyLink and Intrado.

Respectfully submitted,



Linda Gardner

Bar No. 32224

5454 West 110<sup>th</sup> Street

Mailstop: KSOPKJ0702


Overland Park, KS 66211

Phone: 913-345-6193

Email: [linda.gardner@centurylink.com](mailto:linda.gardner@centurylink.com)

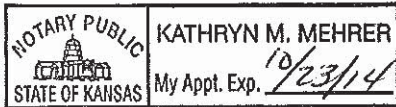
**VERIFICATION**

I, Linda Gardner, an attorney and duly authorized representative of CenturyLink hereby verify and affirm that I have read the foregoing Application for Approval of a Wireline E911 Network Services Commercial Interconnection Agreement between Intrado and CenturyLink, and that the statements contained therein are true and correct to the best of my information and belief.

  
Linda Gardner

Subscribed and sworn to before me on this 30<sup>th</sup> day of September 2011.

My Commission Expires:



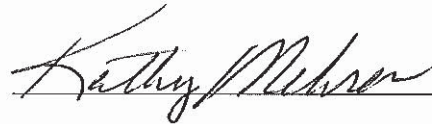
  
Notary Public in and for said  
County and State

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 30<sup>th</sup> day of September 2011, a copy of the above and foregoing Application for Approval of a Wireline E911 Network Services Commercial Interconnection Agreement was served by email to each of the following:

Office of the Public Counsel  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, Missouri 65101

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Missouri Public Service Commission  
200 Madison Street  
Jefferson City, Missouri 65101

  
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