

KSOPKJ0702  
5454 West 110th Street  
Overland Park, KS 66211



[linda.gardner@centurylink.com](mailto:linda.gardner@centurylink.com)  
913-345-6193

January 18, 2011

**FILED**

**JAN 24 2011**

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

**Missouri Public  
Service Commission**

Re: Interconnection and Reciprocal Compensation Agreement By and Between  
CenturyLink and Verizon Wireless 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 CenturyLink ("CenturyLink") for Approval of an Interconnection and Reciprocal Compensation 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

FILED

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

JAN 24 2011

Missouri Public  
Service Commission

In Re: Interconnection and Reciprocal )  
Compensation Agreement By and Between )  
CenturyLink and Verizon Wireless )  
Pursuant to Sections 251 and 252 of the )  
Telecommunications Act of 1996. )

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

**APPLICATION OF CENTURYLINK  
FOR APPROVAL OF AN INTERCONNECTION AND  
RECIPROCAL COMPENSATION AGREEMENT**

COMES NOW, Spectra Communications Group, LLC d/b/a CenturyLink and CenturyTel of Missouri, Inc. d/b/a CenturyLink (jointly "CenturyLink") and files its Application for Approval of an Interconnection and Reciprocal Compensation Agreement ("Agreement") between Verizon Wireless ("Verizon") 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 Delaware limited liability company authorized to do business in Missouri as evidenced by the Certificate of Authority issued by the Missouri Secretary of State which was filed in Case No. TM-2000-182 and incorporated herein by reference. CenturyLink's principle place of business at 100 CenturyLink Drive, Monroe, Louisiana 71203.

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 RECIPROCAL COMPENSATION AGREEMENT**

CenturyLink presents to the Commission its application pursuant to the terms of the Federal Act. CenturyLink and Verizon entered into an Interconnection and Reciprocal Compensation Agreement dated December 22, 2010 (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**

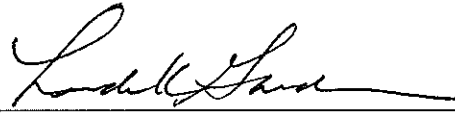
CenturyLink seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. CenturyLink and Verizon believe that the implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, 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 Verizon 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 Interconnection and Reciprocal Compensation Agreement between CenturyLink and Verizon.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda Gardner", written over a horizontal line.

Linda Gardner

Bar No. 32224

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

Mailstop: KSOPKJ0702

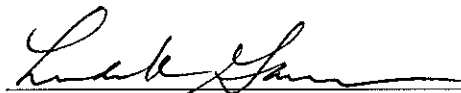
Overland Park, KS 66211

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 of CenturyLink for Approval of an Interconnection and Reciprocal Compensation Agreement 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 19<sup>th</sup> day of January 2011.

My Commission Expires:

  
Notary Public in and for said  
County and State

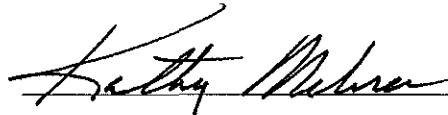


**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 21<sup>st</sup> day of January 2011, a copy of the above and foregoing Application for Approval of an Interconnection and Reciprocal Compensation 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

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

  
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