# DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Application for Approval of an | )                       |
|---|-------------------------|
| Interconnection Agreement between Green Hills       | ) File No. IK-2024-0239 |
| Telephone Corporation d/b/a Green Hills             | )                       |
| Communications and Level 3 Communications, LLC      | )                       |

#### STAFF RECOMMENDATION

**COMES NOW** the Staff of the Missouri Public Service Commission and submits its *Recommendation* as follows:

- 1. On March 1, 2024, pursuant to 20 CSR 4240-28.013(2)(A), Green Hills Telephone Corporation d/b/a Green Hills Communications ("Green Hills") filed with the Public Service Commission its *Application for Approval of an Interconnection Agreement and Request for Waiver of 20 CSR 4240-4.017* ("Agreement") between itself and Level 3 Communications, LLC ("Level 3") under the provisions of the Federal Telecommunications Act of 1996.
- 2. On March 1, 2024, the Commission ordered Level 3 to be made a party to the case. The Commission also ordered that any party could intervene or request a hearing no later than March 18, 2024. Additionally, the Commission ordered Staff to file its recommendation, or a status report regarding when Staff anticipates filing its recommendation, no later than April 2, 2024.
- 3. 47 USC § 252(e)(2) (1996) provides that a state commission may reject an interconnection agreement adopted by negotiation only 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.

4. In lieu of a Memorandum, Staff hereby states that 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 Agreement was filed with the Application. Green Hills is an incumbent local exchange carrier. Level 3 is a competitive local exchange and interexchange carrier.

WHEREFORE, Staff recommends the Commission approve the Application and grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

## /s/ Ron Irving

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### **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 1st day of April, 2024, to all counsel of record.

#### /s Ron Irving