

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

In the Matter of the Amendment to Interconnection	)	
Agreement between Southwestern Bell Telephone	)	<b><u>File No. IK-2025-0269</u></b>
Company, LLC d/b/a AT&T Missouri and	)	
Spectrotel, Inc., adopting previously approved	)	
amendments	)	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"),  
by and through counsel, and submits its *Recommendation* as follows:

1. On April 2, 2025, pursuant to Commission Rule 20 CSR 4240-28.013(2)(B), Southwestern Bell Telephone Company, LLC d/b/a AT&T Missouri ("AT&T") filed a letter with the Missouri Public Service Commission ("Commission") asking the Commission to adopt an approved amendment ("Amendment") to its interconnection agreement ("Agreement")<sup>1</sup> with Spectrotel of the Midwest, LLC d/b/a Touch Base Communications ("Spectrotel") under the provisions of the Federal Telecommunications Act of 1996.<sup>2</sup> AT&T Missouri also asks the Commission to waive the 60-day notice requirement under Commission Rule 20 CSR 4240-4.017(1).

3. On April 8, 2025, the Commission issued an order ("Order"):  
1). adding Spectrotel as a party to this case; 2). directing parties wishing to intervene to do so by April 23, 2025; 3). directing the Commission's Data Center to send a copy of the Order to all interexchange and local exchange telecommunications companies; and 4). directing Staff to file a recommendation by May 9, 2025.

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<sup>1</sup> Commission File No. IK-2012-0395.

<sup>2</sup> The portion of the Federal Telecommunications Act of 1996 which is relevant to this case is codified under 47 U.S.C. 252.

4. A copy of the Amendment was filed with this letter. This Amendment was approved by the Commission in File No. IK-2017-0222 in an interconnection agreement between AT&T Missouri and Level 3 Telecom of Kansas City, LLC. AT&T is an Incumbent Local Exchange Carrier (“ILEC”) and an Interconnected Voice over Internet Protocol (“IVoIP”) service provider. Spectrotel is a Competitive Local Exchange Carrier (“CLEC”) and an Interexchange Carrier (“IXC”). No entities have intervened or requested a hearing. Neither AT&T nor Spectrotel are delinquent in any required filings and both are current in their assessments.

5. 47 U.S.C. § 252(e)(2)(A) (1996) provides that a state commission may reject a negotiated interconnection agreement (or any portion thereof) only if: 1). it discriminates against a telecommunications carrier that is not a party to the agreement; or 2). the implementation of the agreement (or a portion thereof) is inconsistent with the public interest, convenience, and necessity. In lieu of a Memorandum, Staff hereby states that the amendment does not discriminate against telecommunications carriers not a party to it, nor is its implementation inconsistent with the public interest, convenience, or necessity. Therefore, Staff recommends that the Commission approve the amendment.

4. Commission Rule 20 CSR 4240-4.017(1) states, in relevant part: “[a]ny person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case.” However, a party may request that this requirement be waived for good cause.<sup>3</sup> Staff finds AT&T Missouri has

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<sup>3</sup> Commission Rule 20 CSR 4240-4.017(1)(D).

shown good cause, having had no communication with the Commission within the prior 60 days regarding substantive issues likely to be in this case.

**WHEREFORE**, Staff recommends the Commission adopt the Amendment and grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

/s/ Andrea B. Hansen

**Andrea B. Hansen**

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 7<sup>th</sup> day of May, 2025.

/s/ Andrea B. Hansen