

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

In the Matter of the Application of Southwestern Bell )  
Telephone Company, LLC d/b/a AT&T Missouri For )  
Approval of an Interconnection Agreement Under the )  
Telecommunications Act of 1996 )

**File No. IK-2026-0022**

**STAFF RECOMMENDATION**

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

1. On July 22, 2025, Southwestern Bell Telephone Company, LLC d/b/a AT&T Missouri (AT&T Missouri), filed an application with the Missouri Public Service Commission (Commission) for approval of a negotiated Interconnection Agreement with Unite Private Networks, LLC d/b/a Segra (Segra) under the provisions of the Federal Telecommunications Act of 1996 (the Act).

2. AT&T Missouri also requested a waiver of the 60-day notice requirement for good cause shown pursuant to 20 CSR 4240-4.017(1)(D).

3. On August 13, 2025, the Commission issued an order directing its data center to provide notice to all interexchange and local exchange telecommunications companies, ordered Segra be made a party to the case, set an intervention deadline of August 28, 2025, and ordered Staff to file a recommendation regarding AT&T Missouri’s filing no later than September 12, 2025.<sup>1</sup>

4. 47 U.S.C. § 252(e)(2) (1996), provides that a state commission may reject an interconnection agreement adopted by negotiation only if the agreement discriminates

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<sup>1</sup> *Order Directing Notice, Setting Intervention Deadline, and Adding a Party* issued on August 13, 2025.

against a telecommunications carrier not a party to it or its implementation is not consistent with the public interest, convenience, and necessity.

5. 20 CSR 4240-4.017(1) states, in 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,” and 20 CSR 4240-4.017(1)(D) provides the Commission may grant a waiver of the 60-day notice requirement for good cause shown.

6. In lieu of a Memorandum, Staff hereby states that the Interconnection Agreement does not discriminate against telecommunications carriers not a party to it, nor is its implementation inconsistent with the public interest, convenience or necessity. A copy of the Interconnection Agreement was filed with the Application. AT&T Missouri is an incumbent local exchange carrier and interconnected voice over internet protocol service provider in Missouri. Segra is a competitive local exchange carrier, interexchange carrier and interconnected voice over internet protocol service provider in Missouri. No entities have intervened or requested a hearing. Neither AT&T Missouri or Segra are delinquent in any required filings with the Commission.

7. Further, based on the AT&T Missouri’s declarations that it had no communication with the Commission within the prior 150 days regarding substantive issues likely to be in this case, other than those pleadings filed of record, Staff recommends the Commission waive the 60-day notice requirement.

**WHEREFORE,** Staff respectfully recommends the Commission approve AT&T Missouri’s *Application for Approval of Interconnection Agreement* and grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

**/s/ Mark Johnson**

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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 12<sup>th</sup> day of September, 2025, to all counsel of record.

**/s/ Mark Johnson**