BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Socket Telecom, LLC,)	
)	
Complainant,)	
)	
v.)	Case No. TC-2020-0333
)	
CenturyTel of Missouri, LLC,)	
d/b/a CenturyLink,)	
)	
Respondent.)	

ISSUES LIST, ORDER OF WITNESSES, AND WAIVER OF CROSS-EXAMINATION

Socket Telecom, LLC ("Socket") and CenturyTel of Missouri, LLC, d/b/a CenturyLink ("CenturyLink") submit the following Issues List, Order of Witnesses and Waiver of Crossexamination.

I. Issues List

A. Entrance Facilities

1. When is it appropriate for CenturyLink to charge Socket for entrance facilities pursuant to the Interconnection Agreement (ICA) between the parties?

B. Performance Measures

- 2. Is CenturyLink liable for performance measure misses between November 2017 and October 2018?
- 3. Is CenturyLink liable for performance measure misses claimed by Socket that were not discussed by the Implementation Team or that were not the subject of prior notice to CenturyLink to implement a Gap Closure Plan?
- 4. For those performance measure misses claimed by Socket, did CenturyLink miss the specific performance measure?
- 5. Are remedy payments due for all misses once the benchmark is exceeded, or only for misses beyond the benchmark?
- 6. How much does CenturyLink owe Socket for performance measure misses?

C. Dark Fiber Inquiries

- 7. Does the ICA require Socket, when submitting a dark fiber inquiry, to already have collocation facilities or an application submitted to establish collocation facilities in the wire center where the dark fiber will originate and terminate?
- 8. Does the ICA require Socket to submit a dark fiber ASR at the same time it submits a dark fiber inquiry?
- 9. What information must be examined by CenturyLink prior to responding to a dark fiber inquiry?
- 10. What constitutes a wire center for purposes of Socket submitting dark fiber inquiries and orders pursuant to the ICA?

II. Order of Witnesses

Socket - R. Matthew Kohly Anthony Lana

CenturyTel - Abdennaceur Jamal Boudhaouia Joshua Nielsen Alan Lubeck

III. Cross-examination

Socket and CenturyTel waive cross-examination of the witnesses, but reserve the right to question any witness based on questions from Staff, the Judge, or the Commissioners.

Respectfully submitted,

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C. BRYDON, SWEARENGEN & ENGLAND, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 27th day of July, 2020, to the following parties:

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