

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

In the Matter of the Amendment to Interconnection	)	
Agreement between Southwestern Bell	)	
Telephone Company, d/b/a AT&T Missouri	)	<u>File No. IK-2018-0074</u>
And ACN Communication Services, LLC	)	

STAFF RECOMMENDATION

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

1. On September 15, 2017, Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T") filed with the Missouri Public Service Commission its *Amendment to Interconnection Agreement between Southwestern Bell Telephone Company d/b/a AT&T Missouri and ACN Communication Services, LLC*. Even though this is the adoption of an amendment to an interconnection agreement, the process for approval is the same as the adoption of a new interconnection agreement.

2. 47 USC 252(e)(2) provides that a state commission may only reject an interconnection agreement adopted by negotiation 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.

3. 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. AT&T is certificated with the Commission as an incumbent local exchange carrier.

ACN is certificated with the Commission as a competitive local exchange and interexchange carrier.

WHEREFORE, Staff recommends the Commission approve the Application and direct the parties to submit to the Commission any modifications or amendments to the Interconnection Agreement.

Respectfully submitted,

/s/ Whitney Payne

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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 13th day of October, 2017, to all counsel of record.

/s/Whitney Payne