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

In the Matter of the Application of Southwestern	)
Bell Telephone Company d/b/a AT&T Missouri, for	)
Approval of an Amendment to an Interconnection	) File No. IK-2023-0387
Agreement Under the Telecommunications Act of	)
1996.	)

## 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 May 12, 2023, Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T Missouri"), filed with the Missouri Public Service Commission an *Application for Approval of an Amendment to a Negotiated Interconnection Agreement* ("Agreement") between itself and Lingo Telecom, LLC d/b/a Bullseye ("Bullseye"), under the provisions of the Federal Telecommunications Act of 1996. AT&T filed the *Application* using the former name Lingo, which was changed by order of the Commission on March 2, 2023 in Case No. CN-2022-0210.
- 2. On May 25, 2023, the Commission ordered Lingo be made a party to the case. The Commission further ordered that any party could intervene or request a hearing by no later than June 9, 2023, and that Staff shall file its recommendation by June 24, 2023.
- 3. On Jun 8, 2023, AT&T Missouri filed an Amendment to its Application in order to correct an exhibit numbering error and submit Exhibit B, which was omitted from its previous filing.
- 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

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

5. In lieu of a Memorandum, Staff hereby states that the amendment to 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 Amendment was filed with the Application. AT&T Missouri is an incumbent local exchange carrier and is registered to provide IVoIP service. Bullseye is a competitive local exchange and interexchange carrier and is registered to provide IVoIP service. No entities have intervened or requested a hearing. Neither AT&T Missouri nor Bullseye are delinquent in any required filings with the Commission.

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/ J. Scott Stacev

J. Scott Stacey
Senior Staff Counsel
Missouri Bar No. 59027
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-522-6279
573-751-9285 (Fax)
scott.stacey@psc.mo.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this  $13^{\text{th}}$  day of June, 2023.

/s/ J. Scott Stacey