

**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 of an Amendment to an	)	<b><u>File No. IK-2022-0220</u></b>
Interconnection Agreement Under the	)	
Telecommunications Act of 1996	)	

**STAFF RECOMMENDATION**

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

1. On February 18, 2022, Southwestern Bell Telephone Company d/b/a AT&T Missouri filed with the Missouri Public Service Commission its *Application for Approval of an Amendment to an Interconnection Agreement with Comcast Phone of Missouri, LLC d/b/a Comcast Digital Phone* between itself and Comcast Phone of Missouri, LLC d/b/a Comcast Digital Phone ("Comcast Digital Phone").

2. 47 USC 252(e)(2) 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.

3. In lieu of a Memorandum, Staff hereby states that the amendment to 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 Amendment was filed with the *Application*. Southwestern Bell Telephone Company d/b/a AT&T Missouri is certificated with the Commission as an incumbent local exchange carrier. Comcast Digital Phone is certificated with the Commission as a competitive local exchange and interexchange carrier.

**WHEREFORE,** Staff recommends the Commission approve the *Application* and grant such other and further relief as the Commission finds appropriate in the circumstances.

Respectfully submitted,

**/s/ Ron Irving**

Ron Irving  
Senior Counsel  
Missouri Bar No. 56147  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-8702 (Telephone)  
(573) 751-9285 (Fax)  
[ron.irving@psc.mo.gov](mailto:ron.irving@psc.mo.gov)

### **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 22<sup>nd</sup> day of March, 2022, to all counsel of record.

**/s/ Ron Irving**