

**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 Agreement	)	<b><u>File No. IK-2020-0164</u></b>
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 December 13, 2019, 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* between itself and GC Pivotal, LLC, d/b/a Global Capacity.

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 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*. AT&T Missouri is certificated with the Commission as an incumbent local exchange carrier. Global Capacity is certificated with the Commission as a competitive local exchange carrier 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  
Legal 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 15<sup>th</sup> day of January, 2020, to all counsel of record.

**/s/Ron Irving**