

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

In the Matter of the Amendment to Interconnection)	
Agreement between Southwestern Bell Telephone)	<u>File No. IK-2018-0075</u>
Company, d/b/a AT&T Missouri and GC Pivotal,)	
LLC d/b/a Global Capacity)	

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 Application for Approval of an Amendment to an Interconnection Agreement executed between it and GC Pivotal, LLC d/b/a Global Capacity (Global).

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 Agreement was filed with the Application. AT&T is certificated with the Commission as an incumbent local exchange and interexchange telecommunications company. Global is certificated with the Commission as a competitive local exchange telecommunications company.

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/ Nicole Mers

Nicole Mers
Associate Counsel
Missouri Bar No. 66766
P.O. Box 360
Jefferson City, MO 65012
(573) 751-6651 (Telephone)
(573) 751-9285 (Fax)
Nicole.mers@psc.mo.gov

**Attorney for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 19th day of October, 2017.

/s/ Nicole Mers