



## **II. INTERCONNECTION AGREEMENT**

CenturyLink presents to the Commission its application pursuant to the terms of the Federal Act. CenturyLink and Missouri Telecom entered into an Interconnection Agreement which was approved by the Commission in Docket No. TK-2003-0357.

CenturyLink and Missouri Telecom recently entered into the attached Unbundled Network Elements (UNEs) - Resale Forbearance Amendment to the Interconnection Agreement, which amends the Agreement by adding specific terms and conditions for Unbundled Network Elements (UNEs) and Resale as set forth in attachments and Table 1 to the Agreement. There are no outstanding issues related to the Agreement between the parties that require the assistance of mediation or arbitration.

## **III. STANDARD FOR REVIEW**

The statutory standard of review under Section 252(e) of the Act states:

- (e) Approval by State Commission
  - (1) Approval Required. Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the state commission. A State commission to which an agreement is submitted to shall approve or reject the agreement, with written findings as to any deficiencies.
  - (2) under subsection (a) if it finds Grounds for Rejection. The State commission may only reject.
    - (A) an agreement (or any portion thereof) adopted by negotiation that:
      - (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement, or
      - (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity; or...

CenturyLink further states that the Agreement is consistent with the public interest, convenience and necessity in that it allows for full and fair competition and greater choice for the consumer. The Agreement does not discriminate against other carriers who are not a party to the Agreement because the terms of the Agreement are equally available to any other carrier.

**IV. REQUEST FOR APPROVAL**

CenturyLink seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. CenturyLink and Missouri Telecom believe that the implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, provides interconnectivity, and increases customer choices for telecommunications services.

CenturyLink and Missouri Telecom respectfully request that the Commission grant approval of the Agreement, without change, suspension or other delay in its implementation.

**V. CONCLUSION**

WHEREFORE, for the foregoing reasons, CenturyLink requests that the Commission approve the Unbundled Network Elements (UNEs) - Resale Forbearance Amendment to the Interconnection Agreement between CenturyLink and Missouri Telecom, Inc.

Respectfully submitted,

/s/ Becky Owenson Kilpatrick

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 17th day of July, 2020, a copy of the above and foregoing Application of CenturyLink for Approval of the Unbundled Network Elements (UNEs) - Resale Forbearance Amendment to the Interconnection Agreement was served via email and/or U.S. Mail, postage prepaid, to each of the following:

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Missouri Public Service Commission  
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Jefferson City, Missouri 65101  
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