## 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	)	File No. IK-2019-0408
to an Interconnection Agreement Under the	)	
Telecommunications Act of 1996	)	

## STAFF REQUEST FOR CORRECTION

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

- 1. On June 26, 2019, Southwestern Bell Telephone Company d/b/a AT&T Missouri filed with the Missouri Public Service Commission its *Application for Approval of a CMRS Interconnection Agreement* between itself and CSC Wireless, LLC d/b/a Altice Mobile. The *Application* inadvertently was titled as an Amendment to an Interconnection Agreement in EFIS. Staff filed its *Recommendation* on June 27, 2019, for approval of the Amendment and the Commission issued an Order approving the Amendment on July 15, 2019. Staff now recommends approval of an Original Interconnection Agreement, as requested by the language of the *Application*.
- 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 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 Missouri is certificated with

the Commission as an incumbent local exchange carrier. CSC Wireless, LLC d/b/a Altice Mobile, is not certificated with the Commission.

**WHEREFORE,** Staff prays that the Commission will accept this *Request;* approve the *Application* and grant such other and further relief as the Commission finds appropriate in the circumstances.

Respectfully submitted,

## /s/ Whitney Payne

Whitney Payne
Senior Counsel
Missouri Bar No. 64078
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
whitney.payne@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 17<sup>th</sup> day of July, 2019, to all counsel of record.

/s/ Whitney Payne