

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

In Re: Traffic Exchange Agreement By and	)	
Between Bandwidth.com CLEC, LLC	)	
And CenturyTel of Missouri, LLC d/b/a	)	Case No. _____
CenturyLink, And Spectra Communications	)	
Group, LLC d/b/a CenturyLink	)	
Pursuant to Sections 251 and 252	)	
of the Telecommunications Act of 1996.	)	

**APPLICATION OF CENTURYLINK FOR APPROVAL  
OF A TRAFFIC EXCHANGE AGREEMENT**

COMES NOW, CenturyTel of Missouri, LLC d/b/a CenturyLink and Spectra Communications Group, LLC d/b/a CenturyLink (collectively "CenturyLink") and hereby files its Application for Approval of a Traffic Exchange Agreement ("Agreement") between Bandwidth.com CLEC, LLC ("Bandwidth.com") and CenturyLink pursuant to the Telecommunications Act of 1996 (the "Federal Act"). In support of its application, CenturyLink states the following:

**I. APPLICANT**

CenturyTel of Missouri, LLC d/b/a CenturyLink is a Louisiana limited liability corporation that is duly authorized to do business in the state of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of CenturyTel of Missouri, LLC's Certificate of Authority to transact business in Missouri from the Missouri Secretary of State were filed in Case No. TM-2002-232, and are incorporated herein by reference pursuant to 4 CSR 240-2.060(1)(G).

Spectra Communications Group, LLC d/b/a CenturyLink is a Delaware limited liability corporation that is duly authorized to do business in the state of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of Spectra Communications Group, LLC's Certificate of Authority issued by the Missouri Secretary of State were filed in Case No. TM-2000-182 and incorporated herein by reference pursuant to Commission Rule 4 CSR 240-2.060(1)(G).

To CenturyLink's knowledge there are no overdue assessments or annual reports or final unsatisfied judgments or decisions against it involving customer service or rates occurring within the last three years.

## **II. TRAFFIC EXCHANGE AGREEMENT**

CenturyLink presents to the Commission its application pursuant to the terms of the Federal Act. CenturyLink and Bandwidth.com entered into a Traffic Exchange Agreement dated October 1, 2015 (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**

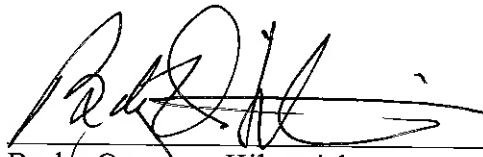
CenturyLink seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. CenturyLink and Bandwidth.com believe that the implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, 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 Bandwidth.com 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 Traffic Exchange Agreement between CenturyTel of Missouri, LLC d/b/a CenturyLink and Spectra Communications Group, LLC d/b/a CenturyLink, and Bandwidth.com CLEC, LLC.

Respectfully submitted,



Becky Owenson Kilpatrick

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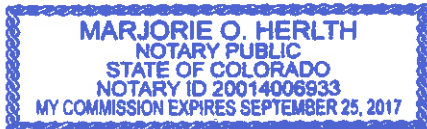
**VERIFICATION**

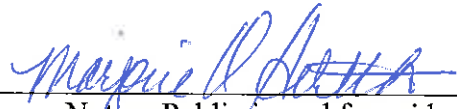
I, Becky Owenson Kilpatrick, an attorney and duly authorized representative of CenturyLink hereby verify and affirm that I have read the foregoing Application of CenturyLink for Approval of a Traffic Exchange Agreement and that the statements contained therein are true and correct to the best of my information and belief.

  
Becky Owenson Kilpatrick

Subscribed and sworn to before me on this 8<sup>th</sup> day of October 2015.

My Commission Expires: 9-25-2017



  
Notary Public in and for said  
County and State

## **CERTIFICATE OF SERVICE**

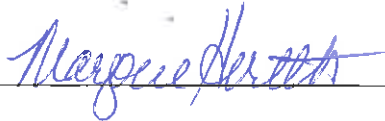
The undersigned hereby certifies that on this 8<sup>th</sup> day of October 2015, a copy of the above and foregoing Application of CenturyLink for Approval of a Traffic Exchange Agreement was served via email to each of the following:

Office of the Public Counsel  
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