

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

In the Matter of the Application of )  
Dobson Cellular Systems, Inc. for )  
Approval of an Amendment to a Cellular- )  
PCS Interconnection Agreement with )  
Southwestern Bell Telephone, L.P. d/b/a )  
AT&T Missouri )

Case No. TK-2007-0321

**STAFF RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and  
for its recommendation respectfully states:

1. In the attached Memorandum, labeled Appendix A, the Staff recommends that the Missouri Public Service Commission grant approval of an Amendment to the Interconnection Agreement between Dobson Cellular Systems, Inc. and Southwestern Bell, L.P. d/b/a AT&T Missouri (Agreement) filed by Dobson Cellular Systems, Inc. under the provisions of the federal Telecommunications Act of 1996.

2. The terms of the Agreement do not discriminate against telecommunications carriers not a party to the Agreement and are not against the public interest, convenience or necessity. Pursuant to 47 U.S.C. §252(e), the Commission is to approve a negotiated interconnection agreement unless the terms of the agreement discriminate against a telecommunications carrier not a party to the agreement, or implementation of the agreement or any portion thereof is inconsistent with the public interest, convenience, or necessity.

**WHEREFORE**, because the terms of the Amendment to the Agreement satisfy the standard set forth in 47 U.S.C. §252(e), Staff recommends the Commission approve

the Amendment and direct the parties to submit any future modifications or amendments to the Agreement to the Commission for approval.

Respectfully submitted,

/s/ Jennifer Heintz

Jennifer Heintz

Assistant General Counsel

Missouri Bar No. 57128

Attorney for the Staff of the

Missouri Public Service Commission

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 30th day of March 2007.

**/s/ Jennifer Heintz**

**To:** Missouri Public Service Commission Official Case File

Case No.: **TK-2007-0321**

**Party:** **Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri (AT&T MO)**

**Type of Carrier:** ☒ Incumbent Local Exchange Carrier (ILEC)  
☐ Competitive Local Exchange Carrier (CLEC)  
☐ Wireless Carrier (CMRS)

**Party:** **Dobson Cellular Systems, Inc. (Dobson)**

**Type of Carrier:** ☐ Incumbent Local Exchange Carrier (ILEC)  
☐ Competitive Local Exchange Carrier (CLEC)  
☒ Wireless Carrier (CMRS)

**From:** Arthur P. Kuss

Telecommunications Department

/s/Wm L Voight 03/28/07

Utility Operations Division/Date

/s/JenniferHeintz 03/30/07

General Counsel's Office/Date

**Subject:** Staff Recommendation for Approval of an Interconnection Agreement or Amendment to an Interconnection Agreement

**Date:** March 28, 2007

**Date Filed:** March 02, 2007

**Staff Deadline:** April 06, 2007

The Telecommunications Department Staff (Staff) recommends the Parties be granted approval of the submitted:

- ☐ Interconnection Agreement
- ☒ Amendment Not Previously Approved

The Parties submitted the proposed Agreement or Amendment to the Missouri Public Service Commission (Commission) pursuant to the terms of the Telecommunications Act of 1996 (Act). Staff has reviewed the proposed Agreement and believes it meets the limited requirements of the Act. Specifically, the Agreement:

- 1) Does not discriminate against telecommunications carriers not party to the Agreement and
- 2) Is not against the public interest, convenience or necessity.

Staff recommends the Commission direct the Parties to submit any modifications or amendments to the Commission.

- ☐ The Applicants have not submitted a serially numbered copy of the Agreement or Amendment. Staff recommends the Commission direct the Parties to submit a serially numbered copy of the Agreement or Amendment.
- ☒ Staff has a serially numbered copy of the Agreement or Amendment.

**Additional Interconnection Agreement or Amendment Review Items**

- ☒ No applications to intervene have been filed. Intervention Deadline: March 27, 2007
- ☒ The Agreement or Amendment has been signed by both Parties.

**Additional Recommendations or Special Considerations (if any):**

**Annual Report & Assessment Information**

- ☒ The Parties are not delinquent in filing Annual Reports or paying PSC Assessments.
- ☐ A Party is delinquent. Staff recommends the Commission grant the requested relief/action on the condition that the applicant corrects the delinquency. The applicant should be instructed to make the appropriate filing in this Case after it has corrected the delinquency.
- ☐ No Annual Report. ☐ Unpaid PSC Assessment. Amount owed:

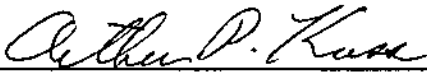
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OF THE STATE OF MISSOURI**

In the Matter of the Application of **Dobson** )  
**Cellular Systems, Inc.** for Approval of an )  
Amendment to a Cellular-PCS Interconnection ) Case No. **TK-2007-0321**  
Agreement with **Southwestern Bell Telephone,** )  
**L.P., d/b/a AT&T Missouri.** )

**AFFIDAVIT OF Arthur P. Kuss**

STATE OF MISSOURI )  
 ) ss:  
COUNTY OF COLE )

Arthur P. Kuss, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in the preparation of the accompanying Memorandum, and that the facts therein are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Arthur P. Kuss

Subscribed and affirmed before me this 29<sup>th</sup> day of March, 2007.

I am commissioned as a Notary Public within the County of Callaway, State of Missouri  
and my commission expires on September 21, 2010



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #06942086

  
\_\_\_\_\_  
NOTARY PUBLIC