

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

In the Matter of the Rate Update Amendment to the)
Interconnection Agreement Between Bandwidth.com)
CLEC, LLC and Embarq Missouri, Inc. d/b/a)
CenturyLink Pursuant to Sections 251 and 252 of the)
Telecommunications Act of 1996)

File No. TK-2021-0105

STAFF RECOMMENDATION

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

1. On October 7, 2020, Embarq Missouri, Inc. d/b/a CenturyLink filed with the Missouri Public Service Commission its *Application of CenturyLink for Approval of the Rate Update Amendment to the Interconnection Agreement* between itself and Bandwidth.com CLEC, LLC d/b/a Bandwidth.com ("Bandwidth.com").

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. Embarq Missouri, Inc. d/b/a CenturyLink is certificated with the Commission as an incumbent local exchange carrier. Bandwidth.com is certificated with the Commission as a competitive local exchange and an interexchange carrier.

WHEREFORE, Staff recommends the Commission approve the *Application* and grant such other and further relief as the Commission finds appropriate in the circumstances.

Respectfully submitted,

/s/ Ron Irving

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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 12th day of November, 2020, to all counsel of record.

/s/ Ron Irving