

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

In the Matter of the Unbundled Network Elements)
(UNEs) – Resale Forbearance Amendment to the)
Interconnection Agreement Between Missouri)
Telecom, Inc. and Spectra Communications Group,)
LLC d/b/a CenturyLink Pursuant to Sections 251 and)
252 of the Telecommunications Act of 1996)

File No. TK-2021-0015

STAFF RECOMMENDATION

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

1. On July 17, 2020, Spectra Communications Group, LLC d/b/a CenturyLink (CenturyLink) filed with the Missouri Public Service Commission its *Application of CenturyLink for Approval of the Unbundled Network Elements (UNEs) - Resale Forbearance Amendment to the Interconnection Agreement* between itself and Missouri Telecom, Inc.

2. 47 U.S.C. § 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. Spectra Communications Group, LLC d/b/a CenturyLink is certificated with the Commission as an incumbent local exchange carrier. Missouri Telecom, Inc. 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/ Jamie S. Myers

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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 21st day of August, 2020, to all counsel of record.

/s/ Jamie S. Myers