

**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 BullsEye)
Telecom, Inc. and Embarq Missouri, Inc. d/b/a)
CenturyLink Pursuant to Sections 251 and 252)
of the Telecommunications Act of 1996)

File No. TK-2020-0348

STAFF RECOMMENDATION

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

1. On May 4, 2020, Embarq Missouri, Inc. d/b/a 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 BullsEye Telecom, Inc.

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. Embarq Missouri, Inc. d/b/a CenturyLink is certificated with the Commission as an incumbent local exchange carrier. BullsEye Telecom, Inc.. is certificated with the Commission as a competitive local exchange and an interexchange carrier and registered to provide IVoIP services

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 28th day of May, 2020, to all counsel of record.

/s/ Ron Irving