

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

In the Matter of the Bill and Keep Amendment	)	
to the Interconnection Agreement Between	)	
Charter Fiberlink-Missouri, LLC and Embarq	)	<b><u>File No. TK-2019-0013</u></b>
Missouri, Inc. d/b/a CenturyLink Pursuant to	)	
Sections 251 and 252 of the Telecommunications	)	
Act of 1996	)	

**STAFF RECOMMENDATION**

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

1. On July 17 2018, Embarq Missouri, Inc., d/b/a CenturyLink ("CenturyLink") filed with the Missouri Public Service Commission an Application for Approval of the TELRIC Transport Amendment to the Interconnection Agreement executed between it and Charter Fiberlink-Missouri, LLC ("Charter").

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. A copy of the Amendment was filed with the Application. CenturyLink is certificated with the Commission as an incumbent local exchange telecommunications company. Charter is certificated with the Commission as a competitive local exchange and interexchange carrier.

**WHEREFORE,** Staff recommends the Commission approve the Application and direct the parties to submit to the Commission any additional modifications or amendments to the Interconnection Agreement.

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 27<sup>th</sup> day of August, 2018, to all counsel of record.

**/s/ Ron Irving**