DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application for Approval)
Of the Resale Agreement By and Between)
BullsEye Telecom, Inc. and) File No. TK-2019-0042
CenturyTel of Missouri, LLC 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 August 16, 2018, CenturyTel of Missouri, LLC, d/b/a CenturyLink (CenturyLink) filed with the Missouri Public Service Commission an Application for Approval of a Resale Agreement between itself and BullsEye Telecom, Inc. (BullsEye) pursuant to the Telecommunications Act of 1996.
- 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 Resale 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 Agreement was filed with the Application. CenturyLink is certificated with the Commission as an incumbent local exchange telecommunications company. BullsEye is certificated as a competitive local exchange and interexchange telecommunications

company, which also has an interconnected voice over internet protocol (iVoIP) registration.

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/ Whitney Payne

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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 11th day of September, 2018, to all counsel of record.

/s/ Whitney Payne