

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

In the Matter of the Application of)	
Syniverse Technologies, Inc. for Approval of an)	Case No. TK-2008-0344
Interconnection Agreement Under the)	
Telecommunications Act of 1996)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and recommends the Missouri Public Service Commission (Commission) approve the submitted Interconnection Agreement. For said recommendation, Staff respectfully states as follows:

1. On April 16, 2008, Syniverse Technologies, Inc. (Syniverse) filed its Application For Approval Of An Interconnection Agreement (Application) with Southwestern Bell Telephone Company d/b/a AT&T Missouri (AT&T Missouri) under the Telecommunications Act of 1996 (Act).
2. Section 252(e)(1) of the Act provides “[a]ny interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted shall approve or reject the agreement, with written findings as to any deficiencies.”
3. Section 252(e)(2) of the Act provides “[t]he State commission may only reject—(A) an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that—
(i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity.”
4. Syniverse represents to the Commission that the Interconnection Agreement

was submitted pursuant to 4 CSR 240-3.513(1) as an interconnection agreement arrived at through negotiation.

5. In the Commission's April 21, 2008, Order Directing Notice And Making Southwestern Bell Telephone Company D/B/A AT&T Missouri, A Party, the Commission's Data Center was ordered to send notice of the Application to all interexchange and local exchange telecommunications companies.

6. In the same Order, interested persons were allowed 20 days to file a motion for hearing.

7. As of May 21, 2008, the Commission has not received any motions requesting a hearing be set in this matter.

8. In the attached Memorandum, labeled Appendix A, Staff states the Interconnection Agreement "1) [d]oes not discriminate against telecommunications carriers not party to the Agreement and 2) [i]s not against the public interest, convenience or necessity."

9. Additionally, Staff indicates in Appendix A that a serially numbered copy of the Interconnection Agreement was not submitted, and recommends the Commission direct the parties to submit such copy to Staff.

WHEREFORE, the Staff respectfully recommends the Commission approve the Interconnection Agreement pursuant to 252(e) of the Telecommunications Act of 1996, and direct the parties to submit a serially numbered copy of the Interconnection Agreement to Staff.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez

Legal Counsel

Missouri Bar No. 59814

Attorney for the Staff of the
Missouri Public Service Commission

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 21st day of May, 2008.

/s/ Jennifer Hernandez

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. **TK-2008-0344**

Party: Syniverse Technologies, Inc.

Type of Carrier:

- ☐ ILEC
☒ CLEC
☐ Wireless

Party: Southwestern Bell Telephone Company d/b/a AT&T Missouri

Type of Carrier:

- ☒ ILEC
☐ CLEC
☐ Wireless

From: Walt Cecil, Telecommunications Department

William L. Voight / 5/13/2008
Utility Operations Division/Date

Jennifer Hernandez/5/13/2008
General Counsel Office/Date

Subject: Staff Recommendation for Approval of Interconnection Agreement or
Amendment to Interconnection Agreement

Date: May 13, 2008

Date Filed: May 16, 2008

Staff Deadline: May 21, 2008

The Telecommunications Department Staff (Staff) recommends the Parties be granted approval of the submitted:

- ☒ Interconnection Agreement
☐ Amendment not previously approved

The parties submitted the proposed Agreement or Amendment to the Missouri Public Service Commission (Commission) pursuant to the terms of the Telecommunications Act of 1996 (Act). Staff has reviewed the proposed Agreement and believes it meets the limited requirements of the Act. Specifically, the Agreement: 1) does not discriminate against telecommunications carriers not party to the Agreement and 2) is not against the public interest, convenience or necessity. Staff recommends the Commission direct the Parties to submit any modifications or amendments to the Commission.

☒ The applicants have not submitted a serially numbered copy of the Agreement or Amendment. Staff recommends the Commission direct the Parties to submit a serially numbered copy of the Agreement or Amendment.

☐ Staff has a serially numbered copy of the Agreement or Amendment.

Additional Interconnection Agreement or Amendment Review Items

☒ No applications to intervene filed.

☒ Agreement or Amendment signed by both Parties.

Additional recommendations or special considerations (if any):

The parties have submitted two signature pages both of which are identified as page 61 of 61 in the General Terms and Conditions section (GT&C). One page is signed and the other is not. The signed page is not located in the GT&C but is located at the end of the document, after *Appendix Performance Measurements*. The unsigned signature page is located at the end of the GT&C.

☒ The Company is not delinquent in filing an annual report and paying the PSC assessment.

☐ The Company is delinquent. Staff recommends the Commission grant the requested relief/action on the condition the applicant corrects the delinquency. The applicant should be instructed to make the appropriate filing in this case after it has corrected the delinquency.

(☐ No annual report ☐ Unpaid PSC assessment. Amount owed:)

In the Matter of the Application of
Syniverse Technologies, Inc. for Approval
of an Interconnection Agreement Under
the Telecommunications Act of 1996

[illegible]

Walt Cecil
Walt Cecil

A circular notary seal for the State of Missouri. The outer ring contains the text "NOTARY PUBLIC" at the top and "STATE OF MISSOURI" at the bottom, separated by two stars. The center of the seal contains the words "NOTARY" and "SEAL" stacked vertically, with three small dots between them.

Susan L. Sundermeier
NOTARY PUBLIC