

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

In the Matter of the Application for FCC Modernizing)
Unbundling and Resale Requirements Amendment)
to the Interconnection Agreement Between Comcast)
Phone of Missouri, LLC d/b/a Comcast Digital Phone)
and Embarq Missouri, Inc. d/b/a CenturyLink)
Pursuant to Sections 251 and 252 of the)
Telecommunications Act of 1996)

File No. TK-2022-0106

STAFF RECOMMENDATION

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

1. On October 12, 2021, Embarq Missouri, Inc. d/b/a CenturyLink (“CenturyLink”) filed with the Missouri Public Service Commission its *Application for Approval of an Interconnection Agreement* between itself and Comcast Phone of Missouri, LLC d/b/a Comcast Digital Phone (“Comcast Digital Phone”). The initial application was deficient in that it did not comply with the 60-day notice requirements of Commission Rule 20 CSR 4240-4.017. CenturyLink filed an amended application on October 28, 2021.

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. CenturyLink is certificated with the Commission as a competitive local exchange and an

interexchange carrier. Comcast Digital Phone 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/ Ron Irving

Ron Irving
Associate Counsel
Missouri Bar No. 56147
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
ron.irving@psc.mo.gov

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 3rd day of December, 2021, to all counsel of record.

/s/ Ron Irving