BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In Re: Interconnection Agreement By and)
Between Charter Fiberlink - Missouri, LLC)
And Spectra Communications Group, LLC) Case No.
d/b/a CenturyLink)
Pursuant to Sections 251 and 252)
of the Telecommunications Act of 1996.)

APPLICATION OF CENTURYLINK FOR APPROVAL OF AN INTERCONNECTION AGREEMENT

COMES NOW, Spectra Communications Group, LLC d/b/a CenturyLink ("CenturyLink") and files its Application for Approval of an Interconnection Agreement ("Agreement") between Charter Fiberlink - Missouri, LLC ("Charter-Fiberlink") and CenturyLink pursuant to the Telecommunications Act of 1996 (the "Federal Act"). In support of its application, CenturyLink states the following:

I. APPLICANT

Spectra Communications Group, LLC d/b/a CenturyLink is a Delaware limited liability corporation that is duly authorized to do business in the state of Missouri and authorized by the Commission to provide basic local and interexchange telecommunications services. Copies of Spectra Communications Group, LLC's Certificate of Authority issued by the Missouri Secretary of State were filed in Case No. TM-2000-182 and incorporated herein by reference pursuant to Commission Rule 4 CSR 240-2.060(1)(G).

To CenturyLink's knowledge there are no overdue assessments or annual reports or final unsatisfied judgments or decisions against it involving customer service or rates occurring within the last three years.

II. INTERCONNECTION AGREEMENT

CenturyLink presents to the Commission its application pursuant to the terms of the Federal Act. CenturyLink and Charter-Fiberlink entered into an Interconnection Agreement dated July 21, 2015 (the "Agreement"). There are no outstanding issues related to the Agreement between the parties that require the assistance of mediation or arbitration.

III. STANDARD FOR REVIEW

The statutory standard of review under Section 252(e) of the Act states:

- (e) Approval by State Commission
 - (1) Approval Required. Any 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 to shall approve or reject the agreement, with written findings as to any deficiencies.
 - (2) under subsection (a) if it finds Grounds for Rejection. The State commission may only reject.
 - (A) an agreement (or any portion thereof) adopted by negotiation 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; or...

CenturyLink further states that the Agreement is consistent with the public interest, convenience and necessity in that it allows for full and fair competition and greater choice for the

consumer. The Agreement does not discriminate against other carriers who are not a party to the

Agreement because the terms of the Agreement are equally available to any other carrier.

IV. REQUEST FOR APPROVAL

CenturyLink seeks the Commission's approval of the Agreement, consistent with the

provisions of the Federal Act. CenturyLink and Charter-Fiberlink believe that the

implementation of this Agreement complies fully with Section 252(e) of the Federal Act because

the Agreement is consistent with the public interest, convenience and necessity and does not

discriminate against any telecommunications carrier. The Agreement promotes diversity in

providers, provides interconnectivity, and increases customer choices for telecommunications

services.

CenturyLink and Charter-Fiberlink respectfully request that the Commission grant

approval of the Agreement, without change, suspension or other delay in its implementation.

V. <u>CONCLUSION</u>

WHEREFORE, for the foregoing reasons, CenturyLink requests that the Commission

approve the Interconnection Agreement between Spectra Communications Group, LLC dba

CenturyLink, and Charter Fiberlink - Missouri, LLC.

Respectfully submitted,

Becky Owenson Kilpatrick

100 CenturyLink Drive Monroe, LA 71203

Phone: 318.340.5027

Becky.kilpatrick@centurylink.com

Bar No. 42042

3

VERIFICATION

I, Becky Owenson Kilpatrick, an attorney and duly authorized representative of CenturyLink hereby verify and affirm that I have read the foregoing Application of CenturyLink for Approval of the Interconnection Agreement and that the statements contained therein are true and correct to the best of my information and belief.

Becky Owenson Kilpatrick

Subscribed and sworn to before me on this _____ day of September, 2015.

My Commission Expires: Upan Peath.

Meage / Moss - v.

Sotary Public in and for said

County and State

MEAGAN MESSINA WOODARD
Notary Public
Notary ID No. 140965
Ouachita Parish, Louisiana

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of September 2015, a copy of the above and foregoing Application of CenturyLink for Approval of the Interconnection Agreement was served via email and/or U.S. Mail, postage prepaid, to each of the following:

Office of the Public Counsel
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65101
opcservice@ded.mo.gov

Office of the General Counsel Missouri Public Service Commission 200 Madison Street Jefferson City, Missouri 65101 staffcounselservice@psc.mo.gov

Charter Fiberlink – Missouri, LLC Attn: Legal Dept- Telephone 12405 Powerscourt Drive St. Louis, MO 63131 Michael.Moore@charter.com

Charter Communications, Inc. Attn: Corporate Telephone – Carrier Relations 12405 Powerscourt Drive St. Louis, MO 63131

Charles A. Hudak Fried, Hudal & Harris, LLP 3 Ravinia Drive, Suite 1700 Atlanta, GA 30346 chudak@fh2.com

