

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

In the Matter of Request for Approval of an	)	
Interconnection Agreement between Alma	)	<u>File No. IK-2025-0332</u>
Communications Company d/b/a Alma Telephone	)	
Company and Level 3 Communications, LLC	)	

STAFF RECOMMENDATION

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

1. On June 13, 2025, Alma Communications Company d/b/a Alma Telephone Company (“Alma Telephone” or “Company”), filed an application with the Missouri Public Service Commission (“Commission”) for approval of a negotiated Interconnection Agreement (“Agreement”) with Level 3 Communications, LLC (“Level 3”) under the provisions of the Federal Telecommunications Act of 1996.

2. Alma Telephone also requested a waiver of the 60-day notice requirement for good cause shown pursuant to 20 CSR 4240-4.017(1)(D).

3. On July 2, 2025, the Commission issued an order directing its data center to provide notice to all interexchange and local exchange telecommunications companies, ordered Level 3 be made a party to the case, set an intervention deadline of July 17, 2025, and ordered Staff to file a recommendation regarding Alma Telephone’s filing no later than August 1, 2025.¹

4. 47 U.S.C. § 252(e)(2) (1996), provides that a state commission may reject an interconnection agreement adopted by negotiation only if the agreement discriminates

¹ Order Directing Notice, Setting Intervention Deadline, and Adding a Party issued on July 2, 2025.

against a telecommunications carrier not a party to it or its implementation is not consistent with the public interest, convenience, and necessity.

5. 20 CSR 4240-4.017(1) states, in part, “[a]ny person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case,” and 20 CSR 4240-4.017(1)(D) provides the Commission may grant a waiver of the 60-day notice requirement for good cause shown.

6. In lieu of a Memorandum, Staff hereby states that the Interconnection Agreement does not discriminate against telecommunications carriers not a party to it, nor is its implementation inconsistent with the public interest, convenience or necessity. A copy of the Interconnection Agreement was filed with the Application. Alma Telephone is an incumbent local exchange carrier in Missouri. Level 3 is a competitive local exchange and interexchange carrier in Missouri. No entities have intervened or requested a hearing. Neither Alma Telephone or Level 3 are delinquent in any required filings with the Commission.

7. Further, based on the Alma Telephone’s declarations that the Company had no communication with the Commission within the prior 150 days regarding substantive issues likely to be in this case, other than those pleadings filed of record, Staff recommends the Commission waive the 60-day notice requirement.

WHEREFORE, Staff respectfully recommends the Commission approve Alma Telephone’s *Application for Approval of Interconnection Agreement and Request for Waiver of 20 CSR 4240-4.017* and grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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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 31st day of July, 2025, to all counsel of record.

/s/ Mark Johnson