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20180327112917
Filed Date: 03/27/2018
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March 27, 2018

Ms. Lynn M. Retz
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: Docket No. 06-SWBT-373-IAT – In the Matter of the Application of Southwestern Bell Telephone, L.P. for Approval of Interconnection Agreement Under the Telecommunications Act of 1996 With IDT America, Corp.

Dear Ms. Retz:

Attached via electronic filing with the Commission is the Application for Approval of an amendment to the Interconnection Agreement previously approved between Southwestern Bell Telephone Company d/b/a AT&T Kansas and IDT America, Corp. ("CLEC") on October 24, 2005 in the above-captioned docket (hereinafter "the Agreement"). Also enclosed is the supporting Affidavit of Richard T. Howell, Area Manager-Regulatory Relations.

This Amendment implements the FCC's ICC Order in the current Agreement.

The Agreement, with this proposed amendment and the attachments incorporated therein, is an integrated package and is the result of negotiation and compromise. There are no outstanding issues between the parties that need the assistance of mediation or arbitration. CLEC is registered as active and in good standing with the Kansas Secretary of State's office.

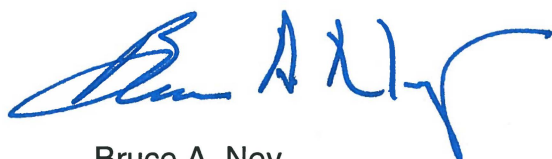
AT&T Kansas files this amendment to the Agreement seeking Commission approval of its terms and conditions consistent with the Federal Telecommunications Act of 1996. AT&T Kansas represents and believes in good faith that the implementation of this amendment to the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. AT&T Kansas specifically requests that the Commission refrain from taking any action to change, suspend or otherwise delay implementation of this amendment to the agreement, in keeping with the support for competition previously demonstrated by the Commission.

Contact information for CLEC is listed below.

| CLEC Officer Name: | Additional Contact Name for Notice: |
|---|-------------------------------------|
| Carl Billek | |
| Sr. Regulatory Counsel | |
| 520 Broad Street, 5 th Floor | |
| Newark, NJ 07102 | |
| Phone: 973-438-4854 | |
| Fax: 973-438-1455 | |
| E-mail: carl.billek@corp.idt.net | |

The Commission's prompt attention to this matter would be appreciated.

Sincerely,



Bruce A. Ney
AVP – Senior Legal Counsel

Attachments

cc: Carl Billek

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

| | | |
|---------------------------------------|---|----------------------------|
| In the Matter of the Application of |) | |
| Southwestern Bell Telephone, L.P. for |) | |
| Approval of Interconnection Agreement |) | Docket No. 06-SWBT-373-IAT |
| Under the Telecommunications Act of |) | |
| 1996 With IDT America, Corp. |) | |

**APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY
FOR APPROVAL OF AN AMENDMENT TO INTERCONNECTION AGREEMENT**

Southwestern Bell Telephone Company d/b/a AT&T Kansas hereby files this Application for Approval of an Amendment to the Interconnection Agreement under the Telecommunications Act of 1996 ("Federal Act") between AT&T Kansas and IDT America, Corp. (hereinafter "the Agreement") and respectfully shows the Kansas Corporation Commission ("Commission") the following:

I. INTRODUCTION

1. AT&T Kansas presents to this Commission an amendment to the Agreement previously negotiated, executed and filed with the Commission on October 11, 2005 pursuant to the terms of the Federal Act. The Commission issued an order approving the Agreement on October 24, 2005. This amendment implements the FCC's ICC Order in the current Agreement. A copy of the executed amendment which reflects the parties' agreement to incorporate this amendment to the Agreement is attached hereto as Attachment I.

II. REQUEST FOR APPROVAL

2. AT&T Kansas seeks the Commission's approval of this amendment to the Agreement, consistent with the provisions of the Federal Act. The implementation of this amendment to the Agreement complies fully with Section 252(e) of the Federal Act because the modifications are consistent with the Commission's previous conclusion that the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier.

3. AT&T Kansas respectfully requests that the Commission grant expeditious approval of this amendment to the Agreement, without change, suspension or other delay in its implementation. The Agreement, with this amendment, is a bilateral agreement, reached as a result of negotiations and compromise between competitors, and the parties do not believe a docket or intervention by other parties is necessary or appropriate.

III. STANDARD FOR REVIEW

4. The statutory standards of review are set forth in Section 252(e) of the Federal Act which provides as follows:

Section 252(e) of the Federal Act:

(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 shall approve or reject the agreement, with written findings as to any deficiencies.

(2) **GROUND FOR REJECTION.** -- The 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 . . .

5. The affidavit of Richard T. Howell, Area Manager-Regulatory Relations, establishes that the amendment to the Agreement submitted herein satisfies the standards for approval under the Federal Act. (Affidavit, Attachment II).

IV. KANSAS LAW

6. The negotiated and executed amendment to the Agreement is consistent with the Kansas regulatory statutes.

V. CONCLUSION

7. For the reasons set forth above, AT&T Kansas respectfully requests that the Commission approve this amendment to the Agreement previously approved.

Respectfully submitted,



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Austin, Texas 78701
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(512) 870-3420 (Facsimile)
Attorney for Southwestern Bell Telephone
Company d/b/a AT&T Kansas

**AMENDMENT
to
INTERCONNECTION AGREEMENT UNDER
SECTIONS 251 AND 252 OF THE
TELECOMMUNICATIONS ACT OF 1996**

by and between

**SOUTHWESTERN BELL TELEPHONE COMPANY
d/b/a**

AT&T KANSAS

and

IDT AMERICA, CORP

AMENDMENT

BETWEEN

**BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T ALABAMA,
AT&T FLORIDA, AT&T GEORGIA, AT&T KENTUCKY, AT&T LOUISIANA,
AT&T MISSISSIPPI, AT&T NORTH CAROLINA AND AT&T SOUTH
CAROLINA, ILLINOIS BELL TELEPHONE COMPANY D/B/A AT&T
ILLINOIS, INDIANA BELL TELEPHONE COMPANY INCORPORATED
D/B/A AT&T INDIANA, MICHIGAN BELL TELEPHONE COMPANY D/B/A
AT&T MICHIGAN, NEVADA BELL TELEPHONE COMPANY D/B/A AT&T
NEVADA AND AT&T WHOLESALE, SOUTHWESTERN BELL
TELEPHONE COMPANY D/B/A AT&T KANSAS AND AT&T TEXAS,
WISCONSIN BELL, INC. D/B/A AT&T WISCONSIN**

AND

IDT AMERICA, CORP. AND IDT AMERICA, CORP. D/B/A DSA TELECOM

Signature: eSigned - Bill PereiraName: eSigned - Bill Pereira
(Print or Type)Title: President
(Print or Type)Date: 23 Feb 2018IDT America, Corp. and IDT America, Corp.
d/b/a DSA TelecomSignature: eSigned - William BockelmanName: eSigned - William Bockelman
(Print or Type)Title: DIR-INTERCONNECTION AGREEMENTS
(Print or Type)Date: 23 Feb 2018

BellSouth Telecommunications, LLC d/b/a AT&T ALABAMA, AT&T FLORIDA, AT&T GEORGIA, AT&T KENTUCKY, AT&T LOUISIANA, AT&T MISSISSIPPI, AT&T NORTH CAROLINA and AT&T SOUTH CAROLINA, Illinois Bell Telephone Company d/b/a AT&T ILLINOIS, Indiana Bell Telephone Company Incorporated d/b/a AT&T INDIANA, Michigan Bell Telephone Company d/b/a AT&T MICHIGAN, Nevada Bell Telephone Company d/b/a AT&T NEVADA and AT&T Wholesale, Southwestern Bell Telephone Company d/b/a AT&T KANSAS and AT&T TEXAS, Wisconsin Bell, Inc. d/b/a AT&T WISCONSIN by AT&T Services, Inc., its authorized agent

| State | CLEC OCN |
|----------------|----------|
| FLORIDA | 765A |
| GEORGIA | 509E |
| MISSISSIPPI | 294G |
| SOUTH CAROLINA | 467E |

| Description | ACNA Code(s) |
|-------------|--------------|
| ACNA(s) | IDR |

**AMENDMENT TO THE AGREEMENT
BETWEEN
IDT AMERICA, CORP. AND IDT AMERICA, CORP. D/B/A DSA TELECOM
AND**

**BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T ALABAMA, AT&T FLORIDA, AT&T
GEORGIA, AT&T KENTUCKY, AT&T LOUISIANA, AT&T MISSISSIPPI, AT&T NORTH CAROLINA AND
AT&T SOUTH CAROLINA; ILLINOIS BELL TELEPHONE COMPANY D/B/A AT&T ILLINOIS; INDIANA
BELL TELEPHONE COMPANY INCORPORATED D/B/A AT&T INDIANA MICHIGAN BELL
TELEPHONE COMPANY D/B/A AT&T MICHIGAN; NEVADA BELL TELEPHONE COMPANY D/B/A
AT&T NEVADA AND AT&T WHOLESALE; SOUTHWESTERN BELL TELEPHONE COMPANY D/B/A
AT&T KANSAS AND TEXAS; AND WISCONSIN BELL, INC. D/B/A AT&T WISCONSIN**

This Amendment (the "Amendment") amends the Agreements by and between AT&T and CLEC as shown in the attached Exhibit A.

WHEREAS, AT&T and CLEC are Parties to the Agreements as shown in the attached Exhibit A; and

WHEREAS, CLEC has changed its registered name in the state of Michigan and desires to modify the Agreement to incorporate such change; and

WHEREAS, the Parties desire to amend the Agreement to implement to the *Connect America Fund et al.*, WC Docket No. 10-90 et al, Report and Order issued by the Federal Communications Commission ("FCC") on November 18, 2011 (FCC 11-161), and as amended by the FCC on December 23, 2011 (FCC 11-189) ("FCC ICC Reform Order"), and

NOW, THEREFORE, in consideration of the promises and mutual agreements set forth herein, the Parties agree to amend the Agreement as follows:

1. The Amendment is composed of the foregoing recitals, the terms and conditions, contained within, Exhibit A – Interconnection Agreements and Exhibit B - Pricing Sheet, all of which are hereby incorporated within this Amendment by this reference and constitute a part of this Amendment.
2. For the state of Michigan, the Agreement is hereby amended to reflect the name change from IDT America Corp. to IDT America, Corp. d/b/a DSA Telecom.
3. **Intercarrier Compensation**
 - 3.1. The Parties hereby implement the intercarrier compensation rates reflected in the Pricing Sheet attached hereto as Exhibit B, for the termination of all Section 251(b)(5) Traffic exchanged between the Parties in the applicable state(s). The intercarrier compensation rates included in Exhibit B hereby supersede the existing rate elements included in the Agreement for purposes of reciprocal compensation.
4. There shall be no retroactive application of any provision of this Amendment prior to the Effective Date of an adopting CLEC's agreement.
5. This Amendment shall be deemed to revise the terms and provisions of the Agreement only to the extent necessary to give effect to the terms and provisions of this Amendment. In the event of a conflict between the terms and provisions of this Amendment and the terms and provisions of the Agreement (including all incorporated or accompanying Appendices, Addenda, and Exhibits to the Agreement), this Amendment shall govern, provided, however, that the fact that a term or provision appears in this Amendment but not in the Agreement, or in the Agreement but not in this Amendment, shall not be interpreted as, or deemed grounds for finding, a conflict for purposes of this Amendment.
6. In entering into this Amendment, neither Party waives, and each Party expressly reserves, any rights, remedies or arguments it may have at law or under the intervening law or regulatory change provisions in the underlying Agreement (including intervening law rights asserted by either Party via written notice predating this Amendment) with respect to any orders, decisions, legislation or proceedings and any remands thereof, which the Parties have not yet fully incorporated into this Agreement or which may be the subject of further review.

7. This Amendment shall not modify or extend the Effective Date or Term of the underlying Agreement, but rather, shall be coterminous with such Agreement.
8. EXCEPT AS MODIFIED HEREIN, ALL OTHER TERMS AND CONDITIONS OF THE UNDERLYING AGREEMENT SHALL REMAIN UNCHANGED AND IN FULL FORCE AND EFFECT.
9. Signatures by all Parties to this Amendment are required to effectuate this Amendment. This Amendment may be executed in counterparts. Each counterpart shall be considered an original and such counterparts shall together constitute one and the same instrument.
10. For all States except Ohio, California, and Wisconsin: This Amendment shall be filed with and is subject to approval by the applicable state Commission and shall become effective ten (10) days following approval by such Commission. For Ohio: Based on the Public Utilities Commission of Ohio Rules, the Amendment is effective upon filing and is deemed approved by operation of law on the 91st day after filing. For California: Pursuant to Resolution ALJ 257, this filing will become effective, absent rejection of the Advice Letter by the Commission, upon thirty days after the filing date of the Advice Letter to which this Amendment is appended. For Wisconsin: Pursuant to Wisconsin Statute § 196.40, this Amendment shall become effective ten (10) calendar days after the mailing date of the final order approving this Amendment.

Exhibit A

| AT&T ILEC (“AT&T”) | CARRIER Legal Name | Contract Type | Approval Date / Last Party Signed Date |
|--|--------------------------------------|--|---|
| BellSouth Telecommunications, LLC d/b/a AT&T ALABAMA, AT&T FLORIDA, AT&T GEORGIA, AT&T KENTUCKY, AT&T LOUISIANA, AT&T MISSISSIPPI, AT&T NORTH CAROLINA and AT&T SOUTH CAROLINA | IDT America, Corp. | 9 State - Interconnection | Dated – 03/13/2006 |
| Illinois Bell Telephone Company d/b/a AT&T ILLINOIS | IDT America, Corp. | 13 State - Interconnection - Renegotiated 1 | Approved - 6/23/2010 |
| Indiana Bell Telephone Company Incorporated d/b/a AT&T INDIANA | IDT America, Corp. | 13 State - Interconnection - Renegotiated 1 | Approved - 10/29/2009 |
| Michigan Bell Telephone Company d/b/a AT&T MICHIGAN | IDT America, Corp. d/b/a DSA Telecom | Interconnection Agreement | Approved - 10/23/2003 |
| Nevada Bell Telephone Company d/b/a AT&T NEVADA and AT&T Wholesale | IDT America, Corp. | 13 State - Interconnection | Approved - 3/19/2004 |
| Southwestern Bell Telephone Company d/b/a AT&T KANSAS | IDT America, Corp. | Interconnection - X2A Successor - Renegotiated 1 | Approved - 10/24/2005 |
| Southwestern Bell Telephone Company d/b/a AT&T TEXAS | IDT America, Corp. | Interconnection - X2A Successor - Renegotiated 1 | Approved - 9/27/2005 |
| Wisconsin Bell, Inc. d/b/a AT&T WISCONSIN | IDT America, Corp. | 13 State - Interconnection - Renegotiated 1 | Approved - 12/21/2009 |

Pricing Sheet
Exhibit B

| Attachment | State | Product | Rate Element Description | COS (Class of Service) | USOC | Zone | Monthly Recurring Charge (MRC) | Non- Recurring Charge (NRC) First | Non- Recurring Charge (NRC) Additional | Per Unit |
|------------|-------|--|--|------------------------|-------|------|--------------------------------------|--|---|----------|
| 2MR-AT | KS | LOCAL INTERCONNECTION (CALL TRANSPORT AND TERMINATION | Rate for All ISP-Bound and section 251(b)(5) Traffic as per FCC 01-131, per MOU | | ZZUR2 | | \$0.00 | NA | NA | MOU |
| 2MR-AT | KS | LOCAL INTERCONNECTION (CALL TRANSPORT AND TERMINATION | Optional EAS Transport and Termination per MOU | | ZZUR2 | | \$0.00 | NA | NA | MOU |

BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of)
Southwestern Bell Telephone, L.P. for)
Approval of Interconnection Agreement) Docket No. 06-SWBT-373-IAT
Under the Telecommunications Act of)
1996 With IDT America, Corp.)

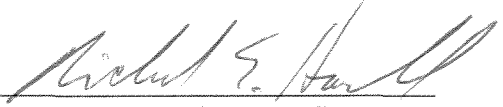
AFFIDAVIT OF RICHARD T. HOWELL

STATE OF TEXAS)
) ss
COUNTY OF DALLAS)

On the 26th day of March 2018, Richard T. Howell of Southwestern Bell Telephone Company d/b/a AT&T Kansas, personally appeared before me, the undersigned authority, and upon being duly sworn on oath, deposed and said the following:

1. My name is Richard T. Howell. I am over the age of 21; I am of sound mind and competent to testify to the matters stated herein. I am the Area Manager-Regulatory Relations for AT&T Kansas, and I have personal knowledge concerning both the Interconnection Agreement ("the Agreement") between AT&T Kansas and IDT America, Corp. that was approved by the Commission on October 24, 2005 in the above captioned proceeding and the proposed amendment to that Agreement that is the subject of this filing.
2. This amendment implements the FCC's ICC Order in the current Agreement.
3. There are no outstanding issues between the parties that need the assistance of mediation and arbitration relating to the amendment to the Agreement.
4. The implementation of this amendment to the Agreement is consistent with the public interest, convenience and necessity.

5. This amendment to the Agreement does not discriminate against any telecommunications carrier. The amendment is available to any similarly situated local service provider in negotiating a similar agreement.
6. The negotiated and executed amendment to the Agreement is consistent with Kansas law.


Richard T. Howell

Subscribed and sworn to before me this 26th day of March 2018.


Notary Public

My Commission Expires: 3-29-2020

