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Kansas Corporation Commission
/S/ Susan K. Duffy

November 8, 2007

STATE CORPORATION COMMISSION

Ms. Susan K. Duffy, Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

NOV 08 2007

 Docket
Room

RE: Interconnection Agreement between AT&T Kansas and Twin Valley
Communications, Inc.

Dear Ms. Duffy:

Enclosed for filing with the Commission are an original and three (3) copies of an Application for Approval of an Interconnection Agreement (the MFN Agreement) between Southwestern Bell Telephone Company d/b/a AT&T Kansas and Twin Valley Communications, Inc. ("Twin Valley") executed on November 5, 2007 and the supporting affidavit of Janet Arnold, Manager-Regulatory Relations.

Twin Valley has chosen in the attached MFN Agreement to adopt an interconnection agreement previously approved by the Commission in KS Dkt. No. 06-SWBT-1100-IAT in arbitrated proceedings designed to develop successor agreements for the Kansas 271 Interconnection Agreement. There are no outstanding issues between the parties that need the assistance of mediation or arbitration. AT&T Kansas files this MFN Agreement seeking Commission approval of its terms and conditions consistent with the Federal Act of 1996. Twin Valley is registered as active and in good standing with the Kansas Secretary of State's office.

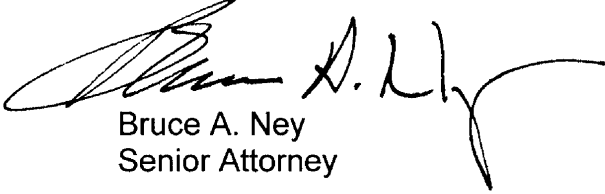
AT&T Kansas represents and believes in good faith that the implementation of this MFN Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. AT&T Kansas specifically requests that the Commission refrain from taking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

Contact information for Twin Valley is listed below.

| | |
|------------------------------------|---------------------|
| CLEC Officer Name: | CLEC Attorney Name: |
| Michael J. Foster | |
| Vice President | |
| 22 Spruce | |
| Miltonvale, KS 67466 | |
| Phone: 785-427-2211 | |
| Fax: 785-427-2216 | |
| E-mail: Mike.foster@twinvalley.net | |

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

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Ney", with a long, sweeping horizontal stroke extending to the right.

Bruce A. Ney
Senior Attorney

Enclosures

cc: Mr. Tom Stratton (transmittal letter only)
Mr. Michael Foster

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

STATE CORPORATION COMMISSION

NOV 08 2007

 Docket
Room

Application of Southwestern Bell)
Telephone Company for Approval of)
Interconnection Agreement Under the) Docket No. 08-SWBT-455-IAT
Telecommunications Act of 1996 With)
Twin Valley Communications, Inc.)

**APPLICATION OF SOUTHWESTERN BELL TELEPHONE COMPANY FOR
APPROVAL OF INTERCONNECTION AGREEMENT UNDER THE
TELECOMMUNICATIONS ACT OF 1996**

Southwestern Bell Telephone Company d/b/a AT&T Kansas hereby files this Application for Approval of an Interconnection Agreement ("the MFN Agreement") with Twin Valley Communications, Inc. ("Twin Valley"), pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, Public Law No. 104-104 ("Federal Act") and would respectfully show the Kansas Corporation Commission ("Commission") the following:

I. AGREEMENT REACHED

As noted in the attached MFN Agreement, Twin Valley has chosen to adopt an interconnection agreement previously approved by the Commission on May 2, 2006 in KS Dkt. No. 06-SWBT-1100-IAT in arbitrated proceedings designed to develop successor agreements for the Kansas 271 Interconnection Agreement. There are no outstanding issues between AT&T Kansas and Global Crossing that need the assistance of mediation or arbitration. The MFN Agreement was executed on November 5, 2007.

II. REQUEST FOR APPROVAL

AT&T Kansas seeks the Commission's approval of the MFN Agreement, consistent with the provisions of the Federal Act.

AT&T Kansas believes that the implementation of this MFN Agreement complies fully with Section 252(e) of the Federal Act because it is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. The MFN Agreement promotes diversity in providers, provides interconnectivity, and will increase customer choices for telecommunications services.

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

III. STANDARD FOR REVIEW

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

(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; or

The affidavit of Janet Arnold, Manager-Regulatory Relations, establishes that the MFN Agreement submitted herein satisfies these standards. (Affidavit, Attachment II).

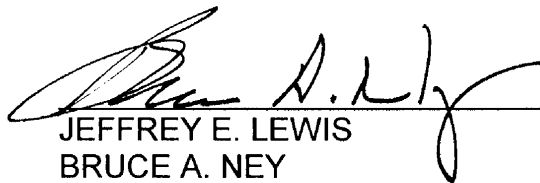
IV. KANSAS LAW

The negotiated and executed MFN Agreement is consistent with the Kansas regulatory statutes.

VI. CONCLUSION

For the reasons set forth above, AT&T Kansas respectfully requests that the Commission approve the MFN Agreement expeditiously.

Respectfully submitted,



JEFFREY E. LEWIS

BRUCE A. NEY

MELANIE N. MCINTYRE

220 E. Sixth Street, Room 515

Topeka, Kansas 66603-3596

(785-276-8413)

Attorneys for Southwestern Bell Telephone Company

(IL#6198060)

(#15554) ◀

(#19945)

**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

TWIN VALLEY COMMUNICATIONS, INC.

**ADOPTION OF INTERCONNECTION AGREEMENT
UNDER SECTION 252(i)
OF THE
TELECOMMUNICATIONS ACT OF 1996**

This Agreement (this "MFN Agreement"), is being entered into by and between Southwestern Bell Telephone Company¹ d/b/a AT&T Kansas ("AT&T Kansas"), and Twin Valley Communications, Inc. ("CLEC"), (each a "Party" and, collectively, the "Parties"), pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 ("the Act").

RECITALS

WHEREAS, pursuant to Section 252(i) of the Act, CLEC has requested to adopt the Interconnection Agreement by and between AT&T Kansas and Logix Communications, LP for the State of Kansas, which was approved by the Kansas Corporation Commission ("the Commission") under Section 252(e) of the Act on May 2, 2006 in docket number 06-SWBT-1100-IAT, including any amendments to such Agreement (the "Separate Agreement"), which is incorporated herein by reference;

NOW, THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, CLEC and AT&T Kansas hereby agree as follows:

1.0 Incorporation of Recitals and Separate Agreement by Reference

- 1.1 The foregoing Recitals are hereby incorporated into and made a part of this MFN Agreement.
- 1.2 Except as expressly stated herein, the Separate Agreement (including any and all applicable Appendices, Schedules, Exhibits, Attachments and Amendments thereto) is incorporated herein by this reference and forms an integral part of the MFN Agreement.

2.0 Modifications to Separate Agreement

- 2.1 References in the Separate Agreement to "CLEC" or to "Other" shall for purposes of the MFN Agreement be deemed to refer to CLEC.
- 2.2 References in the Separate Agreement to the "Effective Date," the date of effectiveness thereof and like provisions shall for purposes of this MFN Agreement be deemed to refer to the date upon which the MFN Agreement is approved by the Commission. In addition, this MFN Agreement shall expire on December 12, 2011.
- 2.3 The Notices Section in the Separate Agreement is hereby revised to reflect that Notices should be sent to CLEC under this MFN Agreement at the following address:

| NOTICE CONTACT | CLEC CONTACT |
|-----------------------|-------------------------------------|
| NAME/TITLE | Michael J. Foster Vice President |
| STREET ADDRESS | 22 Spruce |
| CITY, STATE, ZIP CODE | Miltonvale, KS 67466 |
| PHONE NUMBER | (785) 427-2211 |
| FACSIMILE NUMBER | (785) 427-2216 |
| E-MAIL ADDRESS | Mike.foster@twinvalley.net |

Copy to:

¹ On December 30, 2001, Southwestern Bell Telephone Company (a Missouri corporation) was merged with and into Southwestern Bell Texas, Inc. (a Texas corporation) and, pursuant to Texas law, was converted to Southwestern Bell Telephone, L.P., a Texas limited partnership. On June 29, 2007, Southwestern Bell Telephone, L.P., a Texas limited partnership, was merged with and into SWBT Inc., a Missouri corporation, with SWBT Inc. as the survivor entity. Simultaneous with the merger, SWBT Inc. changed its name to Southwestern Bell Telephone Company. Southwestern Bell Telephone Company is doing business in Kansas as "AT&T Kansas".

| NOTICE CONTACT | CLEC CONTACT |
|-----------------------|--|
| NAME/TITLE | William S. McBride Consultant |
| STREET ADDRESS | c/o Fred Williamson & Associates, Inc. 5810 E Skelly Drive, Suite 900 |
| CITY, STATE, ZIP CODE | Tulsa, OK 74135 |
| PHONE NUMBER | (918) 298-1618 |
| FACSIMILE NUMBER | (918) 299-2569 |
| E-MAIL ADDRESS | bmcbride@fwainc.com |

- 2.4 The Notices Section in the Separate Agreement is hereby revised to reflect that Notices should be sent to AT&T Kansas under this MFN Agreement at the following address:

| NOTICE CONTACT | AT&T-13STATE CONTACT |
|-----------------------|--|
| NAME/TITLE | Contract Management ATTN: Notices Manager |
| STREET ADDRESS | 311 S. Akard, 9 th Floor Four AT&T Plaza |
| CITY, STATE, ZIP CODE | Dallas, TX 75202 |
| FACSIMILE NUMBER | 214-464-2006 |

3.0 Clarifications

- 3.1 In entering into this MFN Agreement, the Parties acknowledge and agree that neither Party waives, and each Party expressly reserves, any of its rights, remedies or arguments it may have at law or under the intervening law or regulatory change provisions in this MFN Agreement (including intervening law rights asserted by either Party via written notice as to the Separate Agreement), with respect to any orders, decisions, legislation or proceedings and any remands by the FCC, state utility commission, court, legislature or other governmental body including, without limitation, any such orders, decisions, legislation, proceedings, and remands which were issued, released or became effective prior to the Effective Date of this MFN Agreement, or which the Parties have not yet fully incorporated into this Agreement or which may be the subject of further government review.
- 3.2 It is AT&T Kansas' position that this MFN Agreement (including all attachments thereto) and every interconnection, service and network element provided hereunder, is subject to all rates, terms and conditions contained in the MFN Agreement (including all attachments/appendices thereto), and that all of such provisions are integrally related and non-severable.

29th IN WITNESS WHEREOF, the Parties hereto have caused this MFN Agreement to be executed as of this
day of October, 2007.

Twin Valley Communications, Inc.

Southwestern Bell Telephone Company d/b/a AT&T
Kansas by AT&T Operations, Inc., its authorized agent

By: Michael J. Foster
Printed: Michael J. Foster

Title: Vice President

Date: October 29, 2007

By: Eddie A. Reed, Jr.
Printed: Eddie A. Reed, Jr.

Title: Director-Contract Management

Date: 11-5-07

Resale AECN # 947C

UNE AECN # _____

FACILITIES BASED AECN # 892C

ACNA WVN

BEFORE THE KANSAS CORPORATION COMMISSION
OF THE STATE OF KANSAS

Application of Southwestern Bell)
Telephone Company for Approval of)
Interconnection Agreement Under the) Docket No. _____
Telecommunications Act of 1996 With)
Twin Valley Communications, Inc.)

AFFIDAVIT OF JANET ARNOLD

STATE OF KANSAS)
) ss
COUNTY OF SHAWNEE)

Before me, the Undersigned Authority, on the 6th day of November, 2007, personally appeared Janet Arnold of Southwestern Bell Telephone Company d/b/a AT&T Kansas who, upon being by me duly sworn on oath depose and said the following:

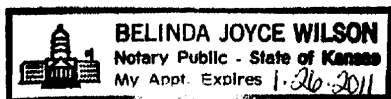
1. My name is Janet Arnold. I am over the age of 21, of sound mind and competent to testify to the matters stated herein. I am the Manager-Regulatory Relations for AT&T Kansas, and I have knowledge concerning the Interconnection Agreement ("the MFN Agreement") between AT&T Kansas and Twin Valley Communications, Inc. ("Twin Valley") on behalf of AT&T Kansas. I have personal knowledge of the provisions of the MFN Agreement which was executed on November 5, 2007.
2. Twin Valley has chosen in the MFN Agreement to adopt an interconnection agreement previously approved by the Commission on May 2, 2006 in KS Dkt. No. 06-SWBT-1100-IAT in arbitrated proceedings designed to develop successor agreements for the Kansas 271 Interconnection Agreement.
3. There are no outstanding issues between the parties that need the assistance of mediation and arbitration.

4. The implementation of this MFN Agreement is consistent with the public interest, convenience and necessity. The MFN Agreement will further the transition of telecommunications competition in the State of Kansas, a policy of this State and the United States. The MFN Agreement allows diversity in providers, provides interconnectivity, and will increase customer choices for telecommunications Solutions.
5. This MFN Agreement does not discriminate against any telecommunications carrier. It is available to any similarly situated provider in negotiating a similar agreement.
6. The MFN Agreement is consistent with Kansas law.



Janet Arnold

Subscribed and sworn to before me this 6th day of November, 2007.





Notary Public

My Commission Expires: January 26, 2011