

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

Application for Approval of the Resale Agreement       )  
and Between Embarq Missouri, Inc. d/b/a                       )  
CenturyLink, United Telephone Company of Kansas       )  
d/b/a CenturyLink, United Telephone Company of       ) Docket No. 20-UTDT-128-IAT  
Southcentral Kansas d/b/a CenturyLink, and United       )  
Telephone Company of Eastern Kansas d/b/a               )  
CenturyLink and Triton Networks, LLC Pursuant to       )  
the Telecommunications Act of 1996                        )

**APPLICATION FOR APPROVAL OF THE RESALE AGREEMENT**

COMES NOW, Embarq Missouri, Inc. d/b/a CenturyLink, United Telephone Company of Kansas d/b/a CenturyLink, United Telephone Company of Southcentral Kansas d/b/a CenturyLink, and United Telephone Company of Eastern Kansas d/b/a CenturyLink (hereinafter connectively "CenturyLink") and files this Application for Approval of the Resale Agreement ("Agreement") between CenturyLink and Triton Networks, LLC ("CLEC") pursuant to the Telecommunications Act of 1996 ("the Act"). In support of its Application, CenturyLink states the following:

**I. AGREEMENT**

CenturyLink presents to the Commission the Agreement for approval pursuant to the terms of the Act. The implementation of the Agreement complies fully with Section 252(e) of the 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 and increases customer choice for telecommunications services. The negotiated and executed Agreement is also consistent with Kansas regulatory statutes.

**II. REQUEST FOR APPROVAL**

CenturyLink seeks the Commission's approval of the Agreement, consistent with the provisions of the Act. The Agreement is bilateral, reached as a result of negotiation and compromise between the parties. There are no outstanding issues involving the limited subject

matter of the Agreement that require the assistance of mediation or arbitration. CenturyLink and CLEC do not believe a docket or intervention by other parties is necessary or appropriate.

CenturyLink requests that the Commission grant expeditious approval of the Agreement, without change, suspension or other delay in its implementation.

### **III. STANDARD OF 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 shall approve or reject the agreement with written findings as to any deficiencies.

(2) Grounds 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.

### **IV. CONTACT INFORMATION**

All communications regarding this Application should be addressed to the following representatives:

**CenturyLink:**

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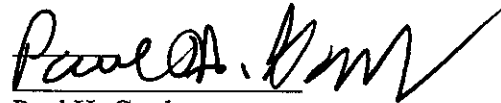
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**V. CONCLUSION**

For the reasons set forth above, CenturyLink respectfully requests that the Commission approve the Agreement.

Respectfully submitted,



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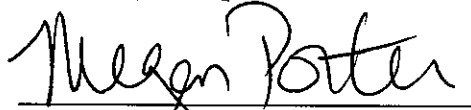
## VERIFICATION

I, Paul H. Gardner, being of lawful age and duly sworn, state that I am counsel for CenturyLink, that I have read and is familiar with the above Application for Approval of the Resale Agreement and that the statements contained therein are true and correct to the best of my knowledge, information and belief.



Paul H. Gardner  
Counsel for CenturyLink

Subscribed and sworn to before me this 11 day of September, 2019.

  
Notary Public

MEGAN PORTER  
NOTARY SEAL-NOTARY PUBLIC  
STATE OF MISSOURI  
JACKSON COUNTY  
MY COMMISSION EXPIRES 11/7/2020  
COMMISSION # 12412385