BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:

Thomas E. Wright, Chairman

STATE CORPORATION COMMISSION

Michael C. Moffet

Joseph F. Harkins

APR 1 5 2009

In the Matter of the Application of Southwestern Bell)
Telephone Company for Approval of Interconnection)
Agreement Under the Telecommunications Act of)
1996 with Trans National Communications)
International, Inc.

Docket No. 09-SWBT-754-IAT

NOTICE OF FILING OF STAFF MEMORANDUM

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), and for its Notice of Filing of Staff Memorandum states as follows:

1. Staff hereby files the attached Staff Memorandum indicating that the Commission should approve the application of Southwestern Bell Telephone Company for an interconnection agreement with Trans National Communications International, Inc.

WHEREFORE, Staff requests the Commission consider its memorandum and for such other and further relief as the Commission deems just and proper.

Respectfully submitted,

Robert L. Lehr, S. Ct. #9997

Litigation Counsel

Kansas Corporation Commission

1500 SW Arrowhead Road

Topeka, Kansas 66604

(785) 271-3240 (Telephone)

(785) 271-3167 (Facsimile)

For Commission Staff

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF SHAWNEE)

Robert L. Lehr, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Notice of Filing of Staff Memorandum* and believes that the statements therein are true to the best of his knowledge, information and belief.

Robert L. Lehr, S. Ct. #9997

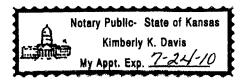
Litigation Counsel

The State Corporation Commission

y L. Dairs

of the State of Kansas

SUBSCRIBED AND SWORN to before me this 15th day of April, 2009.



My Appointment Expires: July 24, 2010

MEMORANDUM UTILITIES DIVISION

TO: Chairman Wright

Commissioner Moffet Commissioner Harkins

FROM: Christine Aarnes

DATE: April 10, 2009

DATE SUBMITTED TO LEGAL: 4/13/09

DATE SUBMITTED TO COMMISSIONERS: $\frac{4}{15/59}$

RE: Docket No. 09-SWBT-754-IAT

In the Matter of the Application Southwestern Bell Telephone Company for Approval of Interconnection Agreement Under the Telecommunications Act of

1996 with Trans National Communications International, Inc.

BACKGROUND:

On March 27, 2009, Southwestern Bell Telephone Company d/b/a AT&T Kansas ("SWBT") filed an application for approval of an Interconnection Agreement with Trans National Communications International, Inc. ("Trans National") under the Telecommunications Act of 1996.

Trans National is properly registered with the Kansas Secretary of State's office as a "foreign for profit" corporation and is currently "active and in good standing" with the Secretary's office.

Commission action on this matter is required no later than June 25, 2009.

ANALYSIS:

SWBT presents this Agreement and its attachments as an integrated package, the result of negotiations and compromise. SWBT states there are no outstanding issues between the parties that need the assistance of mediation or arbitration.

SWBT asserts that implementation of this agreement complies fully with Section 252(e) of the Telecommunications Act of 1996 because the agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier.

Section 252(e) of the Federal Act states that state commissions may reject a negotiated agreement only if it finds that the agreement (or portions thereof) discriminates against a telecommunications

carrier not a party to the agreement; or the implementation of such an agreement (or portions thereof) is not consistent with the public interest, convenience and necessity. Staff has reviewed the agreement and finds no such cause for concern from this filing.

RECOMMENDATION:

Staff has reviewed the agreement and finds no indications that other parties may be disadvantaged or negatively impacted by its approval. Staff recommends commission approval of the negotiated agreement.

cc: Don Low Susan Duffy Tom Stratton

Pat Shurtz Bob Lehr

CERTIFICATE OF SERVICE

09-SWBT-754-IAT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Notice of Filing of Staff Memorandum was placed in the United States mail, postage prepaid, or hand-delivered this 15th day of April, 2009, to the following:

JEFFREY E LEWIS, GENERAL COUNSEL, ROOM 515 SOUTHWESTERN BELL TELEPHONE CO. 220 EAST SIXTH STREET TOPEKA, KS 66603

Fax: 785-276-1948

jeffrey.e.lewis@att.com

BRIAN TWOMEY, PRESIDENT TRANS NATIONAL COMMUNICATIONS INTERNATIONAL, INC.

2 CHARLESGATE WEST BOSTON, MA 02215 Fax: 617-369-1117 btwomey@tncii.com

Pamela Griffeth

Administrative Specialist