## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Application for Approval of a Commercial Mobile )		
Radio Services (CMRS) Interconnection		
Agreement By and Between United Telephone )		
Company of Eastern Kansas d/b/a CenturyLink and )	Docket No	15-UTET-447-IAT
New Cingular Wireless PCS, LLC Pursuant to )		
The Telecommunications Act of 1996		

# APPLICATION FOR APPROVAL OF A COMMERCIAL MOBILE RADIO SERVICES (CMRS) INTERCONNECTION AGREEMENT

COMES NOW, United Telephone Company of Eastern Kansas d/b/a CenturyLink, (hereinafter "CenturyLink") and files a Commercial Mobile Radio Services (CMRS) Interconnection Agreement ("Agreement") between CenturyLink and New Cingular Wireless PCS, LLC ("Carrier") 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 a bilateral agreement, 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 Carrier 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 FOR 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. CONCLUSION

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

### Respectfully submitted,

CENTURYLINK

Linda Gardner

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#### **VERIFICATION**

Linda Gardner, being of lawful age and duly sworn, state that I have read the above Application for Approval of a Commercial Mobile Radio Services (CMRS) Interconnection Agreement, and that the statements contained therein are true and correct to the best of my knowledge, information and belief.

Subscribed and sworn to before me this 30th day of March 2015.

Notary Public in and for said County and State

My Commission Expires. KATHRYN M. MEHRER