



December 17, 2013

Ms. Breanne Potter
Asst Commission Secretary
Public Utilities Commission of Nevada
1150 East William Street
Carson City, Nevada 89701-3109

Re: In re Joint Petition of Central Telephone Company dba CenturyLink
and RCLEC, Inc. for approval of the adoption of the AT&T Communications of Nevada,
Inc. Interconnection, Collocation and Resale Agreement for the State of Nevada Pursuant
to Section 252 of the Telecommunications Act of 1996.

Dear Ms. Potter:

Enclosed for filing is a Joint Petition for Approval of the adoption of the AT&T Communications of Nevada, Inc. Interconnection, Collocation and Resale Agreement for the State of Nevada under Sections 251 and 252 of the Telecommunications Act of 1996 between Central Telephone Company dba CenturyLink ("CenturyLink") and RCLEC, Inc. CenturyLink and RCLEC, Inc. submit the Agreement for the Commission's approval pursuant to Section 252(e) of the Telecommunications Act of 1996.

Also enclosed is a draft notice, pursuant to NAC 703.162, which is not required to be published in the newspaper per NRS 704.6877. A check in the amount of \$200 is also enclosed to cover the filing fee.

If you have any questions, please contact me at (702) 244-7318. Thank you for your assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Linda Stinar".

Linda Stinar
Director Regulatory Affairs

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

In re Joint Petition of Central Telephone Company
d/b/a CenturyLink and RCLEC, Inc. for approval of
the adoption of the AT&T Communications of Nevada, Inc.
Interconnection, Collocation and Resale Agreement for
the State of Nevada pursuant to Section 252 of the
Telecommunications Act of 1996.

Docket No. 13 -

**JOINT PETITION FOR APPROVAL OF INTERCONNECTION, COLLOCATION AND
RESALE AGREEMENT FOR THE STATE OF NEVADA UNDER SECTIONS 251 AND
252 OF THE TELECOMMUNICATIONS ACT OF 1996**

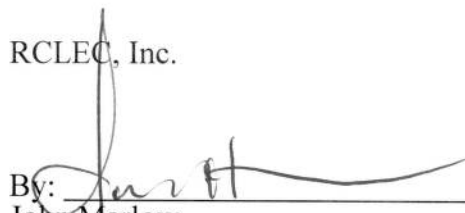
Central Telephone Company dba CenturyLink and RCLEC, Inc. (collectively referred to as the "Parties"), hereby petition the Public Utilities Commission of Nevada (the "Commission") for approval of the adoption agreement attached hereto as Attachment A (the Agreement) – adopting the AT&T Communications of Nevada, Inc. Interconnection, Collocation and Resale Agreement for the State of Nevada.

The Parties submit the Agreement for approval in accordance with the terms of Section 252(e) of the Telecommunications Act of 1996 (the "Act"). The Parties request that the Commission approve the Agreement in accordance with the requirements of Section 252(e) of the Act by determining that the grounds for rejection of such Agreement set forth in Section 252 (e)(2)(A)(i) and Section 252 (e)(2)(A)(ii) of the Act are not applicable to the Agreement. With respect to Section 252(e) (2) of the Act, the Parties assert that the Agreement does not discriminate against any telecommunications carrier not a party to the Agreement. The implementation of the Agreement is consistent with the public interest, convenience, and necessity. The Agreement does not violate any requirement of the Commission.

The Parties respectfully request that the Commission expeditiously approve the Agreement consistent with the intent of the Act.

Dated this 2day of December, 2013.

RCLEC, Inc.

By: 
John Marlow
President
1400 Fashion Island Blvd. 6th floor
San Mateo, CA 94404

Central Telephone Company
dba CenturyLink

By: 
Linda C. Stinar
Director Regulatory Affairs
6700 Via Austi Parkway
Las Vegas, Nevada 89119

Attachment A



**Adoption of the
Interconnection Agreement**

By

RCLEC, Inc.

And

**Central Telephone Company d/b/a CenturyLink
(f/k/a Central Telephone Company d/b/a Embarq)**

**Adopting the
Interconnection Agreement**

Between

**Central Telephone Company d/b/a CenturyLink
[(f/k/a Central Telephone Company d/b/a Embarq)
And**

AT&T Communications of Nevada, Inc.

For the State of Nevada

Adoption of the Interconnection Agreement

This Adoption of the Interconnection Agreement ("Agreement") is entered into by and between RCLEC, Inc. ("CLEC"), a Delaware corporation, and Central Telephone Company [f/k/a Central Telephone Company d/b/a Embarq] d/b/a CenturyLink ("CenturyLink"), a Nevada corporation, each of which may be referred to herein as "Party", or collectively as "the Parties", to establish the rates, terms and conditions for local interconnection and the exchange of Local traffic for the state of Nevada.

NOW THEREFORE, the Parties agree as follows:

1. ADOPTED AGREEMENT

- 1.1 This Agreement between the Parties shall consist of the Interconnection Agreement for the state of Nevada entered into by and between ATT Communications of Nevada, Inc., and Central Telephone Company [formerly Central Telephone Company d/b/a Embarq] dba CenturyLink, as filed with the Nevada Public Utilities Commission ("Commission") - ("Adopted Agreement").
- 1.2 This Agreement is made a part of and incorporates the terms and conditions of the Adopted Agreement, including all amendments to that Adopted Agreement (the "Terms").
- 1.3 Except as set forth herein, the Adopted Agreement remains unchanged and in full force and effect. In the event of a conflict between the Terms of the Adopted Agreement and this Agreement, this Agreement will control.
- 1.4 Unless otherwise stated differently in the Agreement, all CenturyLink obligations are CenturyLink ILEC operating company-specific obligations and are not obligations that are jointly-provided or otherwise shared between the listed operating companies as a collective entity.

2. PARTIES

For the purposes of this Agreement, CLEC is hereby substituted in the Adopted Agreement for ATT Communications of Nevada, Inc.; and CenturyLink shall remain as the other Party to the Adopted Agreement.

3. PROVISIONS

- 3.1 The Terms of the ATT Communications of Nevada, Inc., Agreement are being adopted in its entirety by CLEC pursuant to CLEC's statutory rights under Section 252(i). The filing and performance by CenturyLink of the Terms does not in any way constitute a waiver by CenturyLink of any position as to the Terms or a portion thereof, nor does it constitute a waiver by CenturyLink of any or all rights and remedies it may have to seek review of the Terms, or to seek review in any way of any provisions included in these Terms as a result of CLEC's 252(i) election.
- 3.2 Should CLEC attempt to apply the adopted Terms in a manner that conflicts with the provisions set forth herein, CenturyLink reserves its rights to seek appropriate legal and/or equitable relief.

4. EFFECTIVE DATE AND TERM

- 4.1 This Agreement, if an initial Agreement shall become effective on the date of Commission Approval ("Effective Date"); however the Parties may agree to implement the provisions of this Agreement upon execution by both Parties. However, the initiation of a new account, any new provision of service or obligation or any revision to currently existing services or obligations may take up to 60 days to accommodate any required initial processes.
- 4.2 In the event that the Parties currently have an existing Interconnection Agreement, this Agreement shall replace the existing Interconnection Agreement in its entirety beginning

on the Effective Date. However, nothing relieves the Parties from fulfilling all obligations incurred under that prior Interconnection Agreement.

- 4.3 The expiration date of this Agreement shall be the expiration date of the Adopted Agreement, which is 4/1/2014.

5. NOTICES

Except as otherwise provided, all notices and communication hereunder will be deemed to have been duly given when made in writing and delivered in person or deposited in the U.S. mail, certified, postage paid, return receipt requested, and addressed as follows:

To CenturyLink:

CenturyLink
Director Wholesale Contracts
930 15th Street, 6th Floor
Denver, CO 80202
Phone: 303-672-2879
Email: intagree@centurylink.com

With Copy to:

CenturyLink Legal Department
Wholesale Interconnection
1801 California Street, 9th Floor
Denver, CO 80202
Phone: 303-383-6553
Email: Legal.Interconnection@centurylink.com

To CLEC:

John Marlow
1400 Fashion Island Blvd, Suite 700
San Mateo, CA 94404
Phone: 650.830.5307
Email: JohnM@RingCentral.com
In House Counsel

With Copy to:

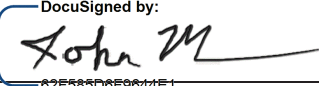
Anita Taff-Rice
1547 Palos Verdes #298
Walnut Creek, CA 94597
Phone: (415) 699-7885
E-mail: anitataffrice@earthlink.net
Counsel for RCLEC, Inc.

6. REGULATORY REQUIREMENTS

- 6.1 CLEC represents and warrants that it is authorized to provide telecommunications services in the State of Nevada.
- 6.2 The Parties will cooperate to file this Agreement with the Commission for approval and complete all attendant requirements of the Commission for such approval.

IN WITNESS WHEREOF, CLEC and CenturyLink have caused this Agreement to be executed by their respective duly authorized representatives.

RCLEC, Inc.

DocuSigned by:

62F585D6F9644E1...

Signature

John Marlow
Printed Name

General Counsel
Title

10/31/2013
Date

**Central Telephone Company
dba CenturyLink**

05E9FC68BD57454...

DocuSigned By: L. T. Christensen

Signature

L. T. Christensen
Printed Name

Director – Wholesale Contracts
Title

10/31/2013
Date

**PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE**

(Per NRS 704.6877, this notice is not required to be published in the newspaper)

Pursuant to Nevada Administrative Code (“NAC”) 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(4)(a)):

Joint Petition for approval of the Adoption of the AT&T Communications of Nevada, Inc. Interconnection, Collocation and Resale Agreement between Central Telephone Company d/b/a CenturyLink and RCLEC, Inc. for the State of Nevada under Sections 251 and 252 of the Telecommunications Act of 1996.

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

Central Telephone Company d/b/a CenturyLink and RCLEC, Inc.

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled AND the effect of the relief or proceeding upon consumers (see NAC 703.160(4)(c)):

Central Telephone Company d/b/a CenturyLink and RCLEC, Inc. submit the adoption of the AT&T Communications of Nevada, Inc. Interconnection, Collocation and Resale Agreement for approval in accordance with the terms of Section 252(e) of the Telecommunications Act of 1996 (the “Act”). The implementation of the Agreement is consistent with the public interest, convenience, and necessity. The Agreement does not violate any requirement of the Commission.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute (“NRS”) 704.069(1)1:

No consumer session is required to be held.

If the draft notice pertains to a tariff filing, please include the tariff number AND the section number(s) or schedule number(s) being revised.

Not applicable.

¹ NRS 704.069 states in pertinent part:

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:

- (a) A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and
- (b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant’s annual gross operating revenue, whichever is less.

CERTIFICATE OF SERVICE

I hereby certify that I have on this 17th day of December 2013, served a copy of the Certificate of Service for the *Joint Petition for Approval of the adoption of the AT&T Communications of Nevada, Inc. Interconnection, Collocation and Resale Agreement* for the State of Nevada under Sections 251 and 252 of the Telecommunications Act of 1996, between Central Telephone Company d/b/a CenturyLink and RCLEC, Inc. upon all parties:

Via Hand Delivery:

Ms. Breanne Potter (original)
Asst Commission Secretary
Public Utilities Commission of Nevada
9075 West Diablo Drive Suite 250
Las Vegas, Nevada 89148

I hereby certify that I have this day served the foregoing documents upon the following parties by either postage pre-paid U.S. Mail or electronic mail to:

RCLEC, Inc.
John Marlow
President
1400 Fashion Island Blvd. 6th floor
San Mateo, CA 94404
JohnM@RingCentral.com

Bureau of Consumer Protection
Eric Witkoski
555 E. Washington St., Suite 3900
Las Vegas, NV 89101
bcpserve@ag.nv.gov

I hereby certify that I have this day served Document Available Notice by electronic transmission or postage pre-paid U.S. Mail to an acceptable location to the list established pursuant to NAC 703.296:

Janice Ono,
Randy Brown
AT&T Nevada
645 East Plumb, Room C144
Reno, NV 89520
janice.ono@att.com
randy.brown@att.com

Charlie Born
Pam Pittenger
Frontier Communications
P.O. Box 340
Elk Grove, CA 95759
charlie.born@ftr.com
pam.pittenger@ftr.com

Harold Oster
Rio Virgin d/b/a Reliance Connects
61 W. Mesquite Blvd.
Mesquite, NV 89027
osterh@cuaccess.net

Marilyn Ash
Mpower Comm. Corp d/b/a
US Telepacific
620 3rd St.
San Francisco, CA 94107
ashm@telepacific.com

Mark DiNunzio
Cox Nevada Telecom, LLC
1515 W. Deer Valley Rd.
Phoenix, AZ 85027
mark.dinunzio@cox.com

Margaret Tobias
Tobias Law Office
460 Pennsylvania Ave
San Francisco, CA 94107
marg@tobiaslo.com

Commercial Telephone Exchange, Inc.
P.O. Box 11527
Reno, NV 89510

Public Utilities Commission of Nevada
pucn.sc@puc.nv.gov

Scott Shaw
Service 1st Energy Solutions
3863 Valley View Blvd. #2
Las Vegas, NV 89103
sshaw@service1stnow.com

I hereby certify the foregoing documents are being made available for inspection at website Internet address: <http://puc.nv.gov/> and http://www.centurylink.com/wholesale/clec_nv.html.

The foregoing documents are available in electronic format or paper format by sending a request to:

Paper: Linda Stinar
CenturyLink
6700 Via Austi Pkwy
Las Vegas, Nevada 89119

Electronic: linda.c.stinar@centurylink.com



Linda Stinar, an employee of Central Telephone
Company dba CenturyLink

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Joint Petition of Central Telephone Company d/b/a)	
CenturyLink and RCLEC, Inc. for approval of an)	
Interconnection Agreement pursuant to Section 252)	Docket No. 13-12015
of the Telecommunications Act of 1996.)	
_____)	

NOTICE OF JOINT PETITION FOR APPROVAL OF AN INTERCONNECTION
AGREEMENT BETWEEN TELECOMMUNICATION CARRIERS UNDER SECTION 252
OF THE TELECOMMUNICATIONS ACT
AND
NOTICE OF PENDENCY OF HEARING

Central Telephone Company d/b/a CenturyLink and RCLEC, Inc. (collectively, "Joint Petitioners") filed with the Public Utilities Commission of Nevada ("Commission") a Joint Petition, designated as Docket No. 13-12015, for approval of an Interconnection Agreement pursuant to Section 252 of the Telecommunications Act of 1996.

This Notice serves only to notify the public that the Commission has received the above-referenced filing. It is the responsibility of interested persons to review the filing and monitor the proceedings to determine their desired levels of involvement based on how this matter may affect their unique situations. The details provided within this Notice are for informational purposes only and are not meant to be an all-inclusive overview of the filing.

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DOCUMENT REVIEW AND APPROVAL ROUTING			
DRAFTED BY: <u>MSF</u>			
FINAL DRAFT ON: <u>12/24/13</u> AT <u>12:00</u> <u>P</u> M			
REVIEWED & APPROVED BY:			DATE:
<input type="checkbox"/>	ADMIN/ASST. ()	<u>1/1</u>
<input checked="" type="checkbox"/>	COMM/COUNSEL	<u>MSF for CEF</u>	<u>12/24/13</u>
<input type="checkbox"/>	SECRETARY/ASST. SEC.		<u>1/1</u>
<input type="checkbox"/>	OTHER ()	<u>1/1</u>

Interested and affected persons may obtain a copy of the Joint Petition from the Commission and may file comments pertaining to the Joint Petition at either of the Commission's offices on or before FRIDAY, JANUARY 17, 2014. Any comments must be simultaneously served on the Commission, the parties to the Agreement, the Regulatory Operations Staff of the Commission, and the Nevada Attorney General's Bureau of Consumer Protection. In response to the comments filed on or before FRIDAY, JANUARY 17, 2014, the Joint Petitioners may file reply comments and legal arguments on or before MONDAY, FEBRUARY 3, 2014.

The Commission has jurisdiction over this matter and legal authority to conduct proceedings pursuant to the Nevada Revised Statutes ("NRS") and the Nevada Administrative Code ("NAC"), Chapters 703 and 704, including but not limited to NRS 704.040 and 704.120, NAC 703.290, and 47 United States Code ("U.S.C.") §252(e). The Commission will make a determination at an open meeting regarding whether to grant the relief requested, which may have an impact on consumers.

NOTICE IS HEREBY GIVEN that a public HEARING in the above matter will be held as follows:

FRIDAY, FEBRUARY 7, 2014
1:30 P.M.
Hearing Room B
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701

Pursuant to NRS 703.320, if the Commission does not receive any adverse comments regarding the Joint Petition or a request for a hearing by FRIDAY, JANUARY 17, 2014, the hearing will be cancelled.

Pursuant to 47 U.S.C. §252(e) and NRS 704.120, the Commission will receive evidence

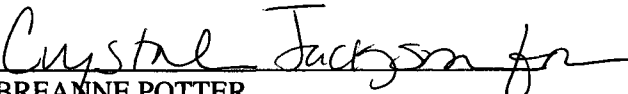
pertaining to the issues raised by filed comments and any responses by Joint Petitioners regarding any dispute over the terms and conditions of the Agreement.

Pursuant to 47 U.S.C. §252(e)(2)(A), the Commission may only reject a negotiated agreement, or any portion thereof, if it finds that (i) the agreement discriminates against a telecommunications carrier not a party to the agreement; or (ii) the implementation of such agreement is not consistent with the public interest, convenience, and necessity.

At the hearing, the Commission may also consider issues related to the provisions of 47 U.S.C. §251 and 252 and Chapters 703 and 704 of the NRS and NAC, may discuss public comments, and may make decisions on the procedural issues raised at the hearing.

In accordance with NRS 704.6877 and NAC 703.290, this Joint Petition is available at the Commission's website at: <http://puc.nv.gov>.

By the Commission,


BREANNE POTTER,
Assistant Commission Secretary

Dated: Carson City, Nevada

12-26-73

(SEAL)

