



April 3, 2014

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 Sprint Spectrum L.P., as agent for Wirelessco, L.P. and SprintCom, Inc. and Sprint Telephony PCS, L.P. and APC PCS, L.L.C. and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS, for approval of ICC Bill and Keep Amendment of the CMRS Interconnection 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 ICC Bill and Keep Amendment of the CMRS Interconnection Agreement for the State of Nevada under Section 252 of the Telecommunications Act of 1996 between Central Telephone Company dba CenturyLink ("CenturyLink") and Sprint Spectrum L.P., as agent for Wirelessco, L.P. and SprintCom, Inc. and Sprint Telephony PCS, L.P. and APC PCS, L.L.C. and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS ("Sprint"). CenturyLink and Sprint submit the Amendment to 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)	
Sprint Spectrum L.P., as agent for)	Docket No. 14 -
Wirelessco, L.P. and SprintCom, Inc. and)	
Sprint Telephony PCS, L.P. and)	
APC PCS, L.L.C. and Phillieco, L.P.,)	
all foregoing entities jointly d/b/a Sprint PCS,)	
for approval of ICC Bill and Keep Amendment)	
of the CMRS Interconnection Agreement)	
for the State of Nevada Pursuant to Section 252)	
of the Telecommunications Act of 1996.)	

**JOINT PETITION FOR APPROVAL OF ICC BILL AND KEEP AMENDMENT TO
THE CMRS INTERCONNECTION AGREEMENT FOR THE STATE OF NEVADA
UNDER SECTIONS 251 AND 252 OF THE TELECOMMUNICATIONS ACT OF 1996**

Central Telephone Company d/b/a CenturyLink (“CenturyLink”) and Sprint Spectrum L.P., as agent for Wirelessco, L.P., and SprintCom, Inc., and Sprint Telephony PCS, L.P. and APC PCS, L.L.C., and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS (“Sprint”) (collectively referred to as the “Parties”), hereby petition the Public Utilities Commission (“Commission”) for approval of the ICC Bill and Keep Amendment to the CMRS Interconnection Agreement for the State of Nevada, attached hereto as Attachment A (“ICC Bill and Keep Amendment”).

The Parties submit the ICC Bill and Keep Amendment 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 ICC Bill and Keep Amendment in accordance with the requirements of Section 252(e) of the Act by determining that the grounds for rejection of such

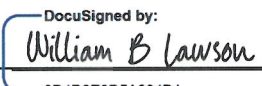
an amendment set forth in Section 252 (e)(2)(A)(i) and Section 252 (e)(2)(A)(ii) of the Act are not applicable to the ICC Bill and Keep Amendment. With respect to Section 252 (e)(2) of the Act, the Parties assert that the ICC Bill and Keep Amendment does not discriminate against any telecommunications carrier not a party to the ICC Bill and Keep Amendment. The implementation of the ICC Bill and Keep Amendment is consistent with the public interest, convenience, and necessity. The ICC Bill and Keep Amendment does not violate any requirement of the Commission.

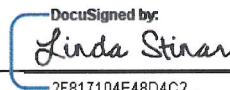
The Parties respectfully request that the Commission expeditiously approve the ICC Bill and Keep Amendment consistent with the intent of the Act.

Dated this 3rd day of April, 2014.

**Sprint Spectrum L.P., as agent for
Wirelessco, L.P., and SprintCom, Inc., and
Sprint Telephony PCS, L.P., and
APC PCS, L.L.C., and Phillieco, L.P.,
all foregoing entities jointly d/b/a Sprint PCS**

Central Telephone Company d/b/a CenturyLink

By: 
0D4D9E8D5A804B4...
William Lawson
Sprint Counsel
6450 Sprint Parkway
KSOPHN0304-3B511
Overland Park, KS 66251

By: 
2F817104E48D4C2...
Linda C. Stinar
Director Regulatory Affairs
6700 Via Austi Parkway
Las Vegas, Nevada 89119

Attachment A

**ICC Bill and Keep Amendment
to the CMRS Interconnection Agreement between
Central Telephone Company d/b/a CenturyLink
and
Sprint Spectrum L.P.**

This Amendment ("Amendment") is to the CMRS Interconnection Agreement between **Central Telephone Company d/b/a CenturyLink f/k/a Central Telephone Company – Nevada d/b/a Sprint ("CenturyLink")** and **Sprint Spectrum L.P., as agent for Wirelessco, L.P., and SprintCom, Inc., and Sprint Telephony PCS, L.P. (f/k/a Cox Communications PCS, L.P.), and APC PCS, L.L.C., and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS ("CMRS")** (collectively, the "Parties").

RECITALS

WHEREAS, the Parties entered into an Interconnection Agreement for service in the State of Nevada dated July 1, 2002, that was approved by the Commission; and

WHEREAS, the Federal Communications Commission in Docket No. 01-92, *In the Matter of Developing an Unified Intercarrier Compensation Regime*, has issued orders that changed the current state of applicable law with respect to, among other things, requirements surrounding the exchange of traffic between CMRS providers and LECs ("FCC Orders" or "Orders"); and

WHEREAS, CMRS has requested to amend the Agreement based on the FCC Orders; and

WHEREAS, the Parties agree to amend the Agreement based on the FCC Orders with the terms and conditions contained herein.

AGREEMENT

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

Amendment Terms

The Agreement is hereby amended by adding terms, conditions, and rates as set forth in this Amendment and Attachment 1, attached hereto and incorporated herein by this reference.

By signature on this Amendment, CMRS has elected to modify existing contract terms in order to implement the applicable provisions of the above mentioned FCC Orders.

By earlier agreement, Nextel of California, Inc. ("Nextel") was made a party to the Agreement. The Parties hereby agree to terminate the Agreement with respect to Nextel, but not as to any of the other entities that are Party to the Agreement. The signature of CMRS on this Amendment represents the agreement by and on behalf of Nextel that was heretofore a party to the Agreement to such termination. The Parties further agree that CenturyLink will issue credits to Nextel, within two billing

cycles after the full execution of amendment, for any amounts which have previously been charged by the CenturyLink to Nextel for terminating Local Traffic from and after July 1, 2012.

Effective Date

This Amendment shall become effective on the date of Commission approval; however, the Parties agree to implement the provisions of this Amendment effective July 1, 2012, pursuant to the FCC Order.

Further Amendments

Except as modified herein, the provisions of the Agreement shall remain in full force and effect. Except as provided in the Agreement, this Amendment may not be further amended or altered, and no waiver of any provision thereof shall be effective, except by written instrument executed by an authorized representative of both Parties.

Entire Agreement

Other than the publicly filed Agreement and its Amendments, CenturyLink and CMRS have no agreement or understanding, written or oral, relating to the terms and conditions for interconnection.

The Parties intending to be legally bound have executed this Amendment as of the dates set forth below, which may be in multiple counterparts, each of which is deemed an original, but all of which shall constitute one and the same instrument.

**Sprint Spectrum L.P., as agent for
Wirelessco, L.P., and SprintCom, Inc., and
Sprint Telephony PCS, L.P., and
APC PCS, L.L.C., and Phillieco, L.P.,
all foregoing entities jointly d/b/a Sprint PCS**

Central Telephone Company d/b/a CenturyLink

DocuSigned by:
Mike Bray
Signature

Mike Bray
Name Printed/Typed

VP – Roaming and Access Planning
Title

3/12/2014
Date

05E9FC68BD57454...
L T Christensen
Signature

L. T. Christensen
Name Printed/Typed

Director – Wholesale Contracts
Title

3/12/2014
Date

Attachment 1

Notwithstanding anything set forth in the Agreement to the contrary, the following terms and provisions shall govern the exchange of Non-Access Telecommunications Traffic, as defined in the Order, between the Parties.

1. General

- 1.1. Bill and Keep shall mean the originating Party has no obligation to pay terminating charges to the terminating Party.
- 1.2. Non-Access Telecommunications Traffic shall have the meaning set forth in 47 CFR §51.701(b) that is originated or terminated as wireless traffic by CMRS' end user.
- 1.3. Pursuant to ¶1006 of the Order, the Parties agree that this Amendment only applies to calls that are initiated by or terminated to Sprint in its capacity as a CMRS provider. The re-origination of a call originated by a non-CMRS provider over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for purposes of reciprocal compensation.
- 1.4. All other terms not otherwise defined in this Amendment are as defined in the Agreement.

2. Inter-carrier Compensation.

- 2.1. Bill and Keep shall apply to the exchange of Non-Access Telecommunications Traffic, solely when such traffic is originated by the end users of one party and terminates to the end users of the other Party (i.e., excludes Transit Traffic, which shall continue to be charged at the same rates in effect prior to this Amendment, irrespective of whether such rate for Transit Traffic have been expressed in terms of billing elements which are otherwise adjusted for purposes of terminating compensation, as referred to below, except the Transit Traffic rate shall no longer include the rate components, if any, that expressly reference the "appropriate interstate tariff"). This compensation arrangement shall supersede any previous usage-based terminating charges of:
 - 2.1.1. End Office Switching, Tandem Switching and/or Common Transport charges or
 - 2.1.2. Any "FCC Opt-In Compensation" or equivalent charges assessed in accordance with the interim rates previously prescribed pursuant to the *Order on Remand and Report and Order*, FCC 01-131, CC Dockets No. 96-98 and 99-68, adopted April 18, 2001 and subsequent orders of the FCC.
- 2.2. Tandem Management.
 - 2.2.1. When Transit Traffic originated by a rural rate-of-return LEC is routed from such LECs meet point with the CenturyLink network through a CenturyLink tandem to the Sprint Point of Interconnection on the CenturyLink network, and the rate-of-return LEC is not legally obligated to compensate CenturyLink for the Transit Service provided in transporting the

traffic to Sprint as a result of paragraph 999 of the FCC Order, then Sprint upon notice from CenturyLink (which notice will be given within a reasonable time after CenturyLink receives notice from such Rural LEC) will either:

2.2.1.1. Establish direct interconnection with such Rural LEC; or

2.2.1.2 Pay the Transit Charges billed by CenturyLink to Sprint for such traffic, subject to the payment and billing dispute provisions of the Agreement.

2.2.2 When CenturyLink bills Sprint Transit Charges regarding a rate-of-return ILEC's originated Transit Traffic under Section 2.2.1 above, CenturyLink shall provide sufficient detail to identify the particular rate-of return ILEC that originated the traffic, and the total volume of such traffic for the period of time being billed. CenturyLink shall cooperate in providing any information requested by Sprint, including but not limited to call detail records, necessary to verify Transit Traffic bills rendered by CenturyLink for Rural LEC originating traffic.

3. Reservation of Rights. This amendment shall remain effective as long as the Agreement remains effective between the Parties. Notwithstanding the foregoing, if as a result of any decision, order or determination of any judicial or regulatory authority with jurisdiction over the subject matter hereof, the FCC Orders regarding the bill-and-keep arrangements for Non-Access Telecommunications Traffic within the scope of 47 C.F.R. § 51.701(b)(2) are reversed, modified or remanded, then the Parties agree to comply with all requirements of the applicable decision, order or determination. If the order vacates or declares void the portion of the FCC's November 18, 2011 order requiring bill-and-keep, then the parties agree that this amendment shall be void and of no effect prospectively. In addition, the parties will work cooperatively to implement any rulings of the court and the FCC with regard to retroactive effect of any such decision, order or determination.

**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 of Central Telephone Company dba CenturyLink and Sprint Spectrum L.P., as agent for Wirelessco, L.P. and SprintCom, Inc. and Sprint Telephony PCS, L.P. and APC PCS, L.L.C. and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS, for approval of ICC Bill and Keep Amendment of the CMRS Interconnection Agreement for the State of Nevada Pursuant to Section 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 and Sprint Spectrum L.P., as agent for Wirelessco, L.P. and SprintCom, Inc. and Sprint Telephony PCS, L.P. and APC PCS, L.L.C. and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS .

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 Sprint Spectrum L.P., as agent for Wirelessco, L.P. and SprintCom, Inc. and Sprint Telephony PCS, L.P. and APC PCS, L.L.C. and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS submit the ICC Bill and Keep Amendment to the CMRS Interconnection Agreement for approval in accordance with the terms of Section 252(e) of the Telecommunications Act of 1996 (the “Act”). The implementation of the Amendment is consistent with the public interest, convenience, and necessity. The Amendment 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 3rd day of April 2014, served a copy of the Certificate of Service for the *Joint Petition for Approval of the ICC Bill and Keep Amendment to the CMRS Interconnection Agreement* for the State of Nevada under Section 252 of the Telecommunications Act of 1996, between Central Telephone Company d/b/a CenturyLink and Sprint Spectrum L.P., as agent for Wirelessco, L.P. and SprintCom, Inc. and Sprint Telephony PCS, L.P. and APC PCS, L.L.C. and Phillieco, L.P., all foregoing entities jointly d/b/a Sprint PCS, 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:

Sprint Spectrum L.P. as agent for
Wirelessco, L.P. and SprintCom, Inc. and
Sprint Telephony PCS, L.P. and
APC PCS, L.L.C. and Phillieco, L.P.,
all foregoing entities jointly d/b/a Sprint PCS
William Lawson
Sprint Counsel
6450 Sprint Parkway
Overland Park, KS 66251
Bret.Lawson@sprint.com

Bureau of Consumer Protection
Eric Witkoski
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
David Collier
AT&T Services, Inc.
645 East Plumb, Room C144
Reno, NV 89520
janice.ono@att.com
randy.brown@att.com
david.collier@att.com

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

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MPower Communications
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sshaw@service1stnow.com

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Frontier Communications
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Everett, WA 98201
george.thomson@ftr.com

Steve Tackes
Kaempfer Crowell Law
510 W. 4th St.
Carson City, NV 89703
stackes@kcnvlaw.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 Sprint Spectrum L.P., as agent for)
Wirelessco, L.P., SprintCom, Inc., Sprint Telephony)
PCS, L.P., APC PCS, L.L.C., and Phillieco, L.P., all)
foregoing entities jointly d/b/a Sprint PCS, for)
approval of the ICC Bill and Keep Amendment of)
the CMRS Interconnection Agreement pursuant to)
Section 252 of the Telecommunications Act of 1996.)
_____)

Docket No. 14-04007

NOTICE OF JOINT PETITION FOR APPROVAL OF AN AMENDMENT TO 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 Sprint Spectrum L.P. ("Sprint Spectrum") (collectively, "Joint Petitioners") filed with the Public Utilities Commission of Nevada ("Commission") a Joint Petition, designated as Docket No. 14-04007, for approval of the ICC Bill and Keep Amendment to their CMRS Interconnection Agreement pursuant to Section 252 of the Telecommunications Act of 1996. Within the Joint Petition, Sprint Spectrum states that it is the agent for Wirelessco, L.P., SprintCom, Inc., Sprint Telephony PCS, L.P., APC PCS, L.L.C., and Phillieco, L.P., and that all of the foregoing entities are jointly doing business as Sprint PCS.

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>4 / 11 / 14</u> AT <u>11 : 30</u> <u>A</u> M	
REVIEWED & APPROVED BY:	DATE:
<input type="checkbox"/> ADMIN/ASST. (_____)	<u>1 / 1</u>
<input checked="" type="checkbox"/> COMM / COUNSEL <u>MSF for GCW</u>	<u>4 / 11 / 14</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 MONDAY, MAY 12, 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 MONDAY, MAY 12, 2014, the Joint Petitioners may file reply comments and legal arguments on or before TUESDAY, MAY 27, 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, MAY 30, 2014
1:00 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 MONDAY, MAY 12, 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

4-14-14

(SEAL)

