



March 31, 2020

Via UPS Delivery

Ms. Trisha Osborne  
Assistant Commission Secretary  
Public Utilities Commission of Nevada  
1150 East William Street  
Carson City, Nevada 89701-3109

**Re: Amendment to the Interconnection Agreement for the State of Nevada Pursuant to Section 252 of the Telecommunications Act of 1996.**

Dear Ms. Osborne:

Enclosed for filing is a Joint Petition for approval of an Amendment to the Interconnection Agreement for the State of Nevada pursuant to Section 252 of the Telecommunications Act of 1996 between Central Telephone Company d/b/a CenturyLink and Southwest Telephone Company 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; and a check in the amount of \$200 is also enclosed to cover the filing fee.

If you have any questions, please contact me at (503) 242-5420, or at [carla.butler@centurylink.com](mailto:carla.butler@centurylink.com). Thank you for your assistance.

Very truly yours,

A handwritten signature in black ink that reads "Carla".

Carla Butler  
Senior Paralegal

Enclosures

**BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA**

IN RE JOINT PETITION OF CENTRAL TELEPHONE DOCKET No.: \_\_\_\_\_  
COMPANY D/B/A CENTURYLINK AND XO  
COMMUNICATIONS SERVICES, LLC FOR  
APPROVAL OF AN AMENDMENT TO THE  
INTERCONNECTION AGREEMENT FOR THE STATE  
OF NEVADA PURSUANT TO SECTION 252 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

**JOINT PETITION FOR APPROVAL OF THE AMENDMENT FOR THE STATE OF NEVADA UNDER  
SECTIONS 251 AND 252 OF THE TELECOMMUNICATIONS ACT OF 1996**

Central Telephone Company d/b/a CenturyLink and XO Communications Services, LLC (collectively referred to as the “Parties”), hereby petition the Public Utilities Commission (the “Commission”) for approval of the Reciprocal Compensation Bill and Keep Amendment for the State of Nevada, attached hereto as Attachment A (the “Amendment”).

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


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

Dated this \_\_\_\_\_ day of March, 2020.

**XO Communications Services, LLC**

**CENTRAL TELEPHONE COMPANY D/B/A  
CENTURYLINK**

By: Dan Higgins  
Daniel J. Higgins  
AVP – Carrier Management  
Phone: 703-547-2000  
[Daniel.higgins@verizon.com](mailto:Daniel.higgins@verizon.com)

  
By: \_\_\_\_\_  
Carla Butler – Sr. Paralegal  
310 SW Park Avenue, Floor 11  
Portland, OR 97205  
Phone: 503-242-5420  
[Carla.butler@centurylink.com](mailto:Carla.butler@centurylink.com)

# **ATTACHMENT A**

**Reciprocal Compensation Bill and Keep Amendment  
to the Interconnection Agreement between  
Central Telephone Company d/b/a CenturyLink  
and  
XO Communications Services, LLC  
for the State of Nevada**

This is an Amendment (“Amendment”) to the Interconnection Agreement between Central Telephone Company d/b/a CenturyLink (fka Central Telephone Company – Nevada d/b/a Sprint of Nevada) (“CenturyLink”), and XO Communications Services, LLC (fka Telecommunications of Nevada, LLC d/b/a XO Communications, LLC) (“CLEC”). CenturyLink and CLEC shall be known jointly as the “Parties”.

**RECITALS**

WHEREAS, the Parties entered into an Interconnection Agreement (“Agreement”) for service in the state of Nevada which was effective on September 11, 2003.

WHEREAS, the Parties desire to amend the Agreement further under 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 for Reciprocal Compensation to be at Bill and Keep for the exchange of Local Traffic as set forth in Table 1, to this Amendment, attached hereto and incorporated herein by this reference. Transit language.

**Effective Date**

This Amendment shall be deemed effective upon approval by the Commission, or by being permitted to go into effect by operation of law; however, the Parties may agree to implement the provisions of this Amendment upon execution.

**Further Amendments**

Except as modified herein, the provisions of the Agreement shall remain in full force and effect. The provisions of this Amendment, including the provisions of this sentence, may not be amended, modified or supplemented, and waivers or consents to departures from the provisions of this Amendment may not be given without the written consent thereto by both Parties' authorized representative. No waiver by any Party of any default, misrepresentation, or breach of warranty or covenant hereunder, whether intentional or not, will be deemed to extend to any

prior or subsequent default, misrepresentation, or breach of warranty or covenant hereunder or affect in any way any rights arising by virtue of any prior or subsequent such occurrence.

**Entire Agreement**

The Agreement as amended (including the documents referred to herein) constitutes the full and entire understanding and agreement between the Parties with regard to the subjects of the Agreement as amended and supersedes any prior understandings, agreements, or representations by or between the Parties, written or oral, to the extent they relate in any way to the subjects of the Agreement as amended.

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

**XO Communications Services, LLC**

**Central Telephone Company d/b/a CenturyLink**

*Daniel J Higgins*  
Daniel J Higgins (Nov 19, 2019)

*Kimberly J. Povirk*  
Kimberly J. Povirk (Nov 19, 2019)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

Daniel J. Higgins  
Name Printed/Typed

Kimberly J. Povirk  
Name Printed/Typed

AVP - Carrier Management  
Title

Director – Sales Support  
Title

Nov 19, 2019

Nov 19, 2019

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

Table 1 - Rates

KEY CODES		Embarq - Nevada		October 1, 2018
MRC	NRC	ICA Elements		
		<b>Reciprocal Compensation for Local Traffic</b>		
		<b>Reciprocal Compensation</b>	<b>Bill and Keep</b>	<b>Common Transport for Indirect Traffic - per Minute of Use</b>
		Local Traffic	<b>\$0.00</b>	
		Common Transport for Indirect Traffic - Per MOU		<b>\$0.001006</b>

**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(5)(a)):**

Joint Petition for approval of the Reciprocal Compensation Bill and Keep Amendment between Central Telephone Company d/b/a CenturyLink and XO Communications Services, LLC 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(5)(b)):**

Central Telephone Company d/b/a CenturyLink d/b/a CenturyLink and XO Communications Services, LLC

**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(5)(c)):**

Central Telephone Company d/b/a CenturyLink and XO Communications Services, LLC submit the Reciprocal Compensation Bill and Kee; for approval in accordance with the terms of Section 252(e) of the Telecommunications Act of 1996 (the “Act”). The implementation of the Amendment to the Interconnection Agreement is consistent with the public interest, convenience, and necessity. The Amendment to the Interconnection 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)<sup>1</sup>:**

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.

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<sup>1</sup> NRS 704.069 states in pertinent part:

1. Except as otherwise provided in subsections 9 and 11 of NRS 704.110, 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 served a copy of this Certificate of Service for the *Joint Petition for Approval of the Reciprocal Compensation Bill and Keep Amendment* for the State of Nevada under Section 252 of the Telecommunications Act of 1996, between XO Communications Services, LLC and Central Telephone Company d/b/a CenturyLink upon all parties:

Ms. Trisha Osborne  
Assistant Commission Secretary  
Public Utilities Commission of Nevada  
9075 West Diablo Drive, Suite 250  
Las Vegas, Nevada 89148

**Via UPS Delivery**

CLEC Representative

**Via Email**

Eric Witkoski  
Bureau of Consumer Protection  
555 E. Washington Street, Suite 3900  
Las Vegas, Nevada 89101  
[bcpserv@ag.nv.gov](mailto:bcpserv@ag.nv.gov)

**Via Email**

### **DOCUMENT AVAILABLE NOTICE**

**I hereby certify that I have served the *Document Available Notice* by electronic transmission (email) to the list established pursuant to NAC 703.296:**

David Collier  
Randy Brown  
AT&T Services, Inc.  
645 East Plumb, Room B132  
Reno, Nevada 89520  
[David.collier@att.com](mailto:David.collier@att.com)  
[Randy.brown@att.com](mailto:Randy.brown@att.com)

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Public Utilities Commission of Nevada  
[Pucn.sc@puc.nv.gov](mailto:Pucn.sc@puc.nv.gov)

Teri Ohta  
T-Mobile  
12920 SE 38<sup>th</sup> Street  
Bellevue, Washington 98006  
[Teri.ohta@t-mobile.com](mailto:Teri.ohta@t-mobile.com)

**I hereby certify the foregoing documents are being made available for inspection at the following websites:**

<http://puc.nv.gov/>; and

[http://www.centurylink.com/wholesale/clec\\_nv.html](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: Carla Butler, Senior Paralegal  
CenturyLink  
310 SW Park Avenue, Floor 11  
Portland, Oregon 97205

Electronic: [Carla.butler@centurylink.com](mailto:Carla.butler@centurylink.com)

Dated this 31<sup>st</sup> day of March, 2020.



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Carla Butler, an employee of Central Telephone Company dba CenturyLink