

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**  
Nashville, Tennessee

In re: *Approval of the Interconnection Agreement Negotiated by and between Twin Lakes Telephone Cooperative and Comcast Phone of Tennessee, LLC d/b/a Comcast Digital Phone Pursuant to Sections 251(a) and 251(b)(5) of the Telecommunications Act*

Docket No. 18-00021

**PETITION FOR APPROVAL OF THE INTERCONNECTION AGREEMENT  
NEGOTIATED BY AND BETWEEN TWIN LAKES TELEPHONE COOPERATIVE  
AND COMCAST PHONE OF TENNESSEE, LLC D/B/A COMCAST DIGITAL PHONE  
PURSUANT TO SECTIONS 251(a) AND 251(b)(5) OF THE TELECOMMUNICATIONS  
ACT**

Twin Lakes Telephone Cooperative (“Twin Lakes”) respectfully files this request with the Tennessee Public Utility Commission for approval of the attached Interconnection Agreement (the “Agreement”). The Agreement was negotiated by and between Twin Lakes and Comcast Phone of Tennessee, LLC d/b/a Comcast Digital Phone (“Comcast”) pursuant to Sections 251(a) & (b)(5) of the Telecommunications Act of 1996 (“the Act”). The Agreement provides for the interconnection and mutual exchange of traffic between the two companies’ networks. Twin Lakes, therefore, respectfully requests that the Commission act within the ninety (90) days specified by the Act and approve the Agreement.

In support of its request, Twin Lakes states the following:

**THE PARTIES**

1. Twin Lakes is an incumbent local exchange carrier authorized to provide local exchange service in the State of Tennessee.

2. Comcast is a telecommunications carrier that has been granted authority by the Tennessee Public Utility Commission to provide competitive local exchange service in the State of Tennessee.

### **THE AGREEMENT**

3. Twin Lakes and Comcast have successfully negotiated the agreement for the interconnection and mutual exchange of traffic between the two companies' networks. A copy of the Agreement is attached hereto and incorporated herein by reference.

4. Twin Lakes and Comcast have entered into this Agreement, pursuant to Sections 251(a) and 251(b)(5) of the Act.

5. Pursuant to Section 252(e) of the Act, Twin Lakes is submitting the Agreement to the Tennessee Public Utility Commission for its consideration and approval.

### **COMPLIANCE WITH THE ACT**

6. First, as required by Section 252(e)(2)(a)(i) of the Act, the Agreement does not discriminate against any other telecommunications carrier.

7. Second, the Agreement is consistent with the public interest, convenience, and necessity, as required by Section 252(e)(2)(a)(ii) of the Act.

### **APPROVAL OF THE AGREEMENT**

8. In accordance with Section 252(e) of the Act, the Tennessee Public Utility Commission is charged with approving or rejecting the Agreement between Twin Lakes and Comcast within ninety (90) days of its submission. The Act provides that the Tennessee Public Utility Commission may reject such Agreement only if it finds that the Agreement or any portion

thereof discriminates against a telecommunications carrier not a party to the Agreement, or if it finds that the implementation of the Agreement or any portion thereof is not consistent with the public interest, convenience and necessity.

9. Twin Lakes and Comcast aver that the Agreement is consistent with the standards for approval.

10. Pursuant to Section 252(i) of the Act, once the Agreement is approved, Twin Lakes will make the entire Agreement available to any similarly situated competitive local exchange carrier.

11. Twin Lakes respectfully requests that the Tennessee Public Utility Commission approve the Agreement negotiated between the parties without revision as expeditiously as possible consistent with the public interest.

This 27<sup>th</sup> day of February 2018.

Respectfully submitted,

By: Lans Chase  
Lans Chase  
John Staurulakis, Inc.  
On Behalf Of:  
Twin Lakes Telephone Cooperative

## **CERTIFICATE OF SERVICE**

I, Lans Chase, hereby certify that on February 27, 2018 I have served a copy of the foregoing Petition for Approval of the Interconnection Agreement on the following *via* electronic mail:

Beth O'Donnell  
Director, Regulatory Affairs  
One Comcast Center, 55th Floor  
1701 John F. Kennedy Blvd.  
Philadelphia, PA 19103  
Office : 215-286-5187  
Beth\_O'Donnell@comcast.com

*Lans Chase*

---

Lans Chase