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TN PUBLIC UTILITY COMMISSION
DOCKET OFFICE

June 12, 2025

Chairman
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37238

RE: Approval of the Amendment to the Mutual Traffic Exchange Agreement Negotiated by TDS
Telecommunications LLC ("TDS Telecom") and Level 3 Communications, LLC ("CLEC")
Docket No. 25-00046

Dear Chairman:

Enclosed for filing in the referenced docket is the original Petition for Approval of the Amendment to the Mutual Traffic Exchange Agreement Negotiated by TDS Telecom and CLEC. As required, included with this filing is the \$50 filing fee made payable to the Tennessee Public Utility Commission.

In accordance with Section 252(e) of the Telecommunications Act of 1996, the Tennessee Public Utility Commission is charged with approving or rejecting the negotiated Amendment between TDS Telecom and CLEC within 90 days of its submission. The Act provides that the Tennessee Public Utility Commission may only reject such an amendment if it finds that the amendment or any portion of the amendment discriminates against a telecommunications carrier not a party to the amendment or the implementation of the amendment or any portion of the amendment is not consistent with the public interest, convenience, and necessity.

CLEC and TDS Telecom aver that the Amendment is consistent with the standards for approval. This Amendment adds interconnected VoIP traffic to Section I "Scope of Agreement", and adds Section II A "Indirect Interconnection". TDS Telecom respectfully requests that the Commission approve the Amendment to the Agreement.

Respectfully Submitted,

/s/ Angie Dickison

Angie Dickison
State Government Affairs Manager
715-690-7116
Angie.Dickison@tdstelecom.com

Enclosures

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
Nashville, Tennessee

In re: Approval of the Amendment to the Interconnection Agreement Negotiated by TDS Telecommunications LLC ("TDS Telecom") and Level 3 Communications, LLC ("CLEC")

Docket No. 25-00046

PETITION FOR APPROVAL OF THE AMENDMENT TO THE MUTUAL TRAFFIC EXCHANGE AGREEMENT NEGOTIATED BETWEEN TDS TELECOMMUNICATIONS AND LEVEL 3 COMMUNICATIONS, LLC

TDS Telecommunications LLC and Level 3 Communications, LLC ("CLEC") file this request for approval of the Amendment to the Mutual Traffic Exchange Agreement (the "Agreement") negotiated between the two companies pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 (the "Act"). In support of their request, CLEC and TDS Telecom state the following:

1. CLEC and TDS Telecom have negotiated an agreement for mutual traffic exchange.
2. The parties have recently negotiated an amendment to the Agreement. The amendment adds interconnected VoIP traffic to Section I "Scope of Agreement" and adds Section II A "Indirect Interconnection". A copy of the Amendment is attached hereto and incorporated herein by reference.
3. Pursuant to Section 252(e) of the Telecommunications Act of 1996, CLEC and TDS Telecom are submitting their Agreement to the Tennessee Public Utility Commission for its consideration and approval. In accordance with Section 252(e) of the

Act, the Tennessee Public Utility Commission is charged with approving or rejecting the negotiated Amendment to the Agreement between TDS Telecom and CLEC within 90 days of its submission. The Act provides that the Tennessee Public Utility Commission may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier not a party to the agreement or the implementation of the agreement or any portion of the agreement is not consistent with the public interest, convenience, and necessity.

4. CLEC and TDS Telecom aver that the Agreement is consistent with the standards for approval.

5. Pursuant to 47 USC Section 252(i) and 47 C.F.R. Section 51.809, TDS Telecom shall make available the entire Mutual Traffic Exchange Agreement approved pursuant to 47 USC Section 252.

CLEC and TDS Telecom respectfully request that the Tennessee Public Utility Commission approve the Amendment to the Agreement negotiated between the parties.

Respectfully submitted,

TDS Telecommunications LLC

By: /s/ Angie Dickison

Angie Dickison
State Government Affairs Manager
715-690-7116
Angie.Dickison@tdstelecom.com

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2025, a copy of the foregoing document was served on the following, via the method indicated:

☐ Hand ☐ Mail ☐ Facsimile ☐ Overnight ☒ Electronic

Level 3 Communications, LLC
Shelly Pedersen
Sr. Carrier Relations Manager Access Management
Organization 10475 10475 Park Meadows Drive
Littleton, CO 80124
shelly.pedersen@lumen.com

/s/ Angie Dickison

Angie Dickison
State Government Affairs Manager
715-690-7116
Angie.Dickison@tdstelecom.com

CW2807200

First Amendment to Mutual Traffic Exchange Agreement

The Mutual Traffic Exchange Agreement dated March 1, 2007 between TDS Telecommunications LLC ("TDS Telecom") and Level 3 Communications, LLC ("CLEC") in Tennessee is hereby amended as follows:

Mutual Traffic Exchange Agreement

Effective

Section I – Scope of Agreement

May 1, 2025

Section II – Connection Arrangements

May 1, 2025

To Section I "**Scope of Agreement**" the following language is added:

Local Traffic may include Interconnected VoIP traffic, as defined by the FCC, that originates and terminates in the same local calling area.

Pursuant to additional Section II A, Exhibit A-1 is added to reflect the mutually agreed upon Points of Interconnection (POIs).

The following section II A is added to "Indirect Interconnection":

**Section II A
Indirect Interconnection**

The Parties agree that for so long as traffic volumes do not warrant direct interconnection, traffic shall be exchanged by transiting such traffic through third party LEC tandems. Each Party shall be financially and operationally responsible for the entire costs of providing facilities from its network to the POI for the exchange of such traffic.

Where the traffic exchanged between CLEC and a specific TDS Telecom host or end office switch requires twenty-four (24) or more trunks for three consecutive months, or it is otherwise economically advantageous, the Parties shall implement direct trunks to the specific host or end office switch in accordance with Section II Connection Arrangements. The Parties agree to negotiate in good faith to reach agreement to accommodate direct interconnection.

The remaining terms and conditions of the Agreement shall remain in effect.

CW2807200

Level 3 Communications, LLC

Signed by:

Sarah Poindexter

D8EC0C43FEC54F2

Signature 4/30/2025 | 11:01 AM CDT

Sarah Poindexter

Printed Name

MGR Voice Interconnection

Position/Title

TDS Telecommunications LLC

DocuSigned by:

Andrew Petersen

2A08635C9D4E4C8...

Signature 4/29/2025 | 3:22 PM CDT

Andrew Petersen

Printed Name

SVP – Corporate Affairs

Position/Title

Signature page to 1st Amendment to the Interconnection Agreement between TDS Telecommunications LLC and Level 3 Communications, LLC .

CW2807200

Exhibit A-1

TDS Telecom – Level 3

Point(s) of Interconnection

The mutually agreed upon Point(s) of Interconnection between Level 3 and TDS Telecom are described below.

TDS Telecom Exchange	NPA-NXX	TDS Switch CLLI	Tandem CLLI	POI Vertical/ Horizontal Coordinates
Concord	865/218, 288, 392, 671, 672, 675, 777, 966	CNCRTNXAPS1	KNVLTNMA90T	V= 06839 H=02273
Halls Crossroads	865/922, 925	HCRDTNXAPS1	KNVLTNMA90T	V=06783 H=02264
Ball Play	423/295	BLPLTNXARP1	KNVLTNMA84T	V=06921 H=02240
Coker Creek	423/261	CKCKTNXARP1	KNVLTNMA84T	V=06967 H=02230
Englewood	423/885, 887	ENWDTNXARP1	KNVLTNMA84T	V=06953 H=02279
Niota	423/568	NIOTTNXARP1	KNVLTNMA84T	V=06941 H=02297
Riceville	423/462	RCVLTNXARP1	KNVLTNMA84T	V=06980 H=02307
Tellico Plains	423/253	TLPLTNXAPS1	KNVLTNMA84T	V=06946 H=02243
Vonore	423/884	VONRTNXARP1	KNVLTNMA84T	V=06900 H=02259
LaVergne	615/213, 280, 287, 501, 641, 793, 903	LVRGTXAPS0	NSVLTNMT84T	V= 07021 H= 02665
Mt. Juliet	615/701,754, 758, 773	MTJLTNXAPS0	NSVLTNMT84T	V = 06981 H= 02674
Clifton	931/676	CFINTNXARP1	NSVLTNMT84T	V= 07260 H= 02822
Collinwood	931/724	CNWDTNXAPS1	NSVLTNMT84T	V= 07279 H= 02762
Linden	931/589	LNDNTNXARP1	NSVLTNMT84T	V= 07202 H= 02822
Lobelville	931/593	LBVLTNXARP1	NSVLTNMT84T	V= 07169 H= 02828
Waynesboro	931/253, 722	WYBOTNXARP1	NSVLTNMT84T	V= 07254 H= 02780
Decaturville	731/852	DCVLTNXARP1	MMPHTNMA84T	V= 07231 H= 02862
Parsons	731/500, 845, 847	PRSSTNXAPS1	MMPHTNMA84T	V= 07219 H= 02870
Sardis	731/858	SRDSTNXARP1	MMPHTNMA84T	V= 07273 H= 02876
Scotts Hill	731/549	SCHLTNXARP1	MMPHTNMA84T	V= 07255 H= 02876