



State of Utah
Department of Commerce
Division of Public Utilities

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**A M E N D E D
M E M O R A N D U M**

To: Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Bill Duncan, Telecommunications / Water Manager
Ron Slusher, Utility Technical Consultant

Date: October 27, 2017

Re: Agreement filing in the Matter of the Interconnection Agreement between QWEST CORPORATION dba CenturyLink QC and Cascade Access, LLC dba Reliance Connects Docket No.17-049-13.

AMENDED RECOMMENDATION (*Acknowledge*):

On October 16, 2017, the Division of Public Utilities (“Division”) issued a recommendation to “Deny” the Interconnection Agreement based on the lack of a Certificate of Public Convenience and Necessity (“CPCN”) by Cascade Access, LLC d/b/a Reliance Connects (“Cascade”). After further review and explanations submitted by the Companies the Division is amending the recommendation asking the Public Service Commission (“Commission”) to Acknowledge the receipt of this Interconnection Agreement.

EXPLANATION:

On or about October 12, 2017, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) filed the Interconnection Agreement per the above-referenced docket in accordance with § 54-8b-2.2(1) (d) of the *Utah Code*. The Division filed a recommendation on October 16, 2017, to deny the request because Cascade Access, LLC d/b/a Reliance Connects has not filed for a CPCN and does not have permission from the Commission to serve within the State of Utah.

After reviewing comments made by CenturyLink and Cascade, the Division has learned that the interconnection agreement was filed because the Utah LATA includes a small portion of Nevada and Cascade needs to interconnect with the CenturyLink tandem switch located in Cedar City, Utah. Both Companies state that Cascade will not serve customers in Utah and that this interconnection is strictly for transport only.

With the comments and clarifications supplied by the Companies, the Division believes the Commission should acknowledge this interconnection agreement between CenturyLink and Cascade.

cc: Diane Roth, Director – Wholesale, Qwest Corporation d/b/a CenturyLink QC
Brooke Wheeler, CFO, Cascade Access, LLC d/b/a Reliance Connects
James Farr, Qwest Corporation d/b/a CenturyLink QC
Courtney Spears, GVNW Consulting, Inc.
Justin Jetter, Assistant Attorney General, State of Utah
Office of Consumer Services, State of Utah