



CenturyLink™



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July 6, 2015

VIA OVERNIGHT MAIL

Irene Kim Asbury, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, NJ 08625

TO 15070774

Re: I/M/O Joint Petition of United Telephone Company of New Jersey, Inc. d/b/a CenturyLink and Cooperative Communications, Inc. for Approval of a Interconnection Agreement - BPU Docket No.

Dear Secretary Asbury:

Enclosed for filing please find an original and ten (10) copies of the Joint Petition of United Telephone Company of New Jersey, Inc. d/b/a CenturyLink and Cooperative Communications, Inc. for approval of a Interconnection Agreement. If you have any questions, please do not hesitate to contact me.

Sincerely,

Sue Benedek

ZEB/jh
enclosures

cc: Louis A. Lombardi, Jr. (via electronic mail)
Carole Artale, Esquire (via electronic mail)
Stephanie Brand (via electronic mail)

Cms
LEGAL
DAG
RPA

J. Figueiredo

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THE AGREEMENT

4. CenturyLink and Cooperative, specifically, have entered into the Agreement which will allow Cooperative to purchase telecommunication services from CenturyLink on a resale basis.

5. CenturyLink and Cooperative have entered into the Agreement pursuant to Sections 251(b), (c) and 252(a) of the 1996 Act.

6. The Agreement sets forth the rates, terms and conditions for the establishment of rates, terms and conditions for interconnection of Cooperative and CenturyLink's local exchange networks for purposes of transmission and termination of local traffic set forth in the Act and the attached Agreement. The Agreement is an integrated package that reflects a negotiated balance of many interests and concerns critical to both parties.

7. The attached Agreement is effective upon Commission approval.

COMPLIANCE WITH THE 1996 ACT

8. The Agreement satisfies the requirements for Board approval pursuant to Section 252(e)(2)(A) of the 1996 Act, which provides as follows:

"The State commission may only reject...an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that--

- (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement;
or
- (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity[.]"

9. First, the Agreement does not discriminate against any other telecommunications carrier, as required by Section 252(e)(2)(A)(i).

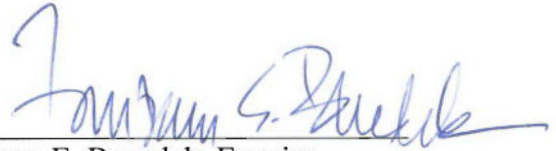
10. Second, the Agreement is consistent with the public interest, convenience, and necessity, as required by Section 252(e)(2)(A)(ii).

APPROVAL OF THE AGREEMENT

11. CenturyLink, in conjunction with Cooperative, respectfully requests that the Board approve this Petition and the attached Agreement to the extent Board approval is required.

WHEREFORE, CenturyLink, with the concurrence of Agreement, respectfully requests that the Board approve the attached Agreement pursuant to Section 252(e) of the 1996 Act.

Respectfully submitted,



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