



CenturyLink™

RECEIVED
CASE MANAGEMENT

DEC 20 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

RECEIVED
MAIL ROOM

DEC 20 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Zsuzsanna E. Benedek
Associate General Counsel
240 North Third Street, Ste. 300
Harrisburg, PA 17101
Telephone: 717.245.6346
Fax: 717.236.1389
sue.benedek@centurylink.com

December 19, 2018

VIA OVERNIGHT MAIL

Ms. Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, NJ 08625

TD 18121350

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

Dear Secretary Camacho:

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 Peerless Network of New Jersey, LLC for approval of an Interconnection Agreement. If you have any questions, please do not hesitate to contact me.

Sincerely,

Sue Benedek

ZEB/jh
enclosures

cc: Patrick Phipps, Director of Regulatory Affairs (*on behalf of Peerless*)(*via electronic mail*)
Carole Artale, Esquire (*via electronic mail*)
Stephanie Brand (*via electronic mail*)

Cms

C. Artale

DAG

RPA

L. Gilbert

J. Figueiredo

H. Bond

TELEC (4)

DEC 20 2018

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES

RECEIVED
MAIL ROOM

DEC 20 2018

BOARD OF PUBLIC UTILITIES
: TRENTON, NJ

**I/M/O JOINT PETITION FOR APPROVAL OF A
INTERCONNECTION AGREEMENT BETWEEN UNITED
TELEPHONE COMPANY OF NEW JERSEY, INC. D/B/A
CENTURYLINK AND PEERLESS NETWORK OF NEW
JERSEY, LLC**

: **BPU DOCKET NO.**

**JOINT PETITION OF
UNITED TELEPHONE COMPANY OF NEW JERSEY, INC. D/B/A CENTURYLINK**

Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 (the "1996 Act"),¹ United Telephone Company of New Jersey, Inc. d/b/a CenturyLink ("CenturyLink"), respectfully files the attached Interconnection Agreement ("Agreement") between CenturyLink and Peerless Network of New Jersey, LLC. ("Peerless Network"). CenturyLink and Peerless Network request that the New Jersey Board of Public Utilities ("Board") approve the attached Agreement. In support, CenturyLink in conjunction with Peerless Network, state as follows:

THE PARTIES

1. CenturyLink is an Incumbent Local Exchange Carrier ("ILEC") authorized to provide local exchange telephone services in portions of the State of New Jersey.
2. Peerless Network is a CLEC in the State of New Jersey.
3. Peerless Network has entered into the underlying Agreement with CenturyLink for the exchanging of traffic in the State of New Jersey. A copy of the Agreement is attached hereto at Appendix A.

¹ Citations herein to the 1996 Act should be construed as references to sections of the Communications Act of 1934 as amended by the 1996 Act.

THE AGREEMENT

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

5. The Agreement sets forth the rates, terms and conditions for the establishment of rates, terms and conditions for interconnection of Peerless Network 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.

6. The attached Agreement is effective upon Commission approval or in accordance with the Board's rules, regulations and orders.

COMPLIANCE WITH THE 1996 ACT

7. 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[.]"

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

9. 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

10. CenturyLink, in conjunction with Peerless Network, 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,



Zsuzsanna E. Benedek, Esquire
United Telephone Company of New Jersey,
Inc. d/b/a CenturyLink
240 North Third Street, Suite 300
Harrisburg, PA 17101
Phone: 717-245-6346
Fax: 717-236-1389
E-mail: sue.benedek@centurylink.com

Dated: December 19, 2018