



Pamela Sherwood
Assistant General Counsel
4625 W. 86th Street
Suite 500
Indianapolis, IN 46268
(317) 713-8977
Pamela.sherwood@lumen.com

November 2, 2020

VIA ELECTRONIC MAIL

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

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

Dear Secretary Camacho-Welsh:

Enclosed for filing please find the Interconnection Agreement by and between United Telephone Company of New Jersey, Inc. d/b/a CenturyLink and Planet Networks, Inc. for approval.

If you have any questions, please do not hesitate to contact me.

Sincerely,


Pamela Sherwood

PS/sac
enclosures

cc: Robert Boyle, CEO (*email: robert@planet.net*)
Ryan Stohr, Facilities Engineer (*ryan@planet.net*)

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

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

:
:
:
:
:
:
:
:
:
:
:

DOCKET NO.

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

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 Planet Networks, Inc. ("Planet Networks") and requests, to the extent necessary, that the New Jersey Board of Public Utilities ("Board") approve the attached Agreement. In support, CenturyLink in conjunction with Planet Networks, states 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. Planet Networks is a Competitive Local Exchange Carrier ("CLEC") in the State of New Jersey.

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.

3. Planet Networks has executed an interconnection agreement with CenturyLink under Section 251 for the State of New Jersey. A copy of the Planet Networks and CenturyLink Agreement is attached hereto at Appendix A.

THE AGREEMENT

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

5. CenturyLink and Planet Networks 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 local resale as defined and 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

CenturyLink, in conjunction with Planet Networks, 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 Planet Networks, respectfully requests that the Board approve the attached Agreement pursuant to Section 252(e) of the 1996 Act.

Respectfully submitted,



Pamela Sherwood, Esquire
United Telephone Company of New Jersey, Inc.
d/b/a CenturyLink
4625 W. 86th Street
Suite 500
Indianapolis, IN 46268
(317) 713-8977
Pamela.sherwood@lumen.com

Dated: November 2, 2020