

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS BELL TELEPHONE COMPANY)
(AT&T Illinois) and)
TW TELECOM OF ILLINOIS LLC)
Joint Petition for Approval of Interconnection) **12 - _____**
Agreement dated October 12, 2012,)
pursuant to 47 U.S.C. § 252)

JOINT PETITION FOR APPROVAL OF
INTERCONNECTION AGREEMENT BETWEEN
TW TELECOM OF ILLINOIS LLC AND AT&T ILLINOIS

Illinois Bell Telephone Company (“AT&T Illinois”) and tw telecom of illinois llc, through their respective counsel and pursuant to Section 252(e) of the Telecommunications Act of 1996 47 U.S.C. § 252(e), (the “Act”), hereby request that the Commission review and approve on an expedited basis the attached Interconnection Agreement dated October 12, 2012 (“Agreement”), which has been adopted by tw telecom of illinois llc pursuant to Section 252(i) of the Act. Expedited approval is requested so that tw telecom of illinois llc and AT&T Illinois may proceed to operate promptly under the terms of the Agreement. In support of their request, the parties state as follows:

1. The Agreement is a result of tw telecom of illinois llc’s adoption of the terms of the Interconnection Agreement between AT&T Illinois and Windstream NuVox Illinois, Inc., pursuant to Section 252(i) of the Act. The Commission has already reviewed and approved that agreement.

2. As set forth in the attached Verification of Patrick Doherty, AT&T Illinois will make the Agreement available to any other telecommunications carrier operating within its territory. Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

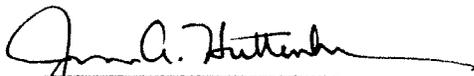
3. In addition, Mr. Doherty’s Verification demonstrates that implementation of the Agreement is consistent with the public interest because it will promote facilities-based local exchange competition and enhance tw telecom of illinois llc’s ability to provide Illinois telecommunications users with a facilities-based, competitive alternative for local telephone services.

4. Copies of the Agreement are available for public inspection in AT&T Illinois and tw telecom of illinois llc’s public offices.

WHEREFORE, AT&T Illinois and tw telecom of illinois llc respectfully request that the Commission approve the attached interconnection Agreement under Section 252(e) of the Act as expeditiously as possible.

Respectfully submitted this 4th day of October, 2012.

AT&T ILLINOIS



James Huttenhower
AT&T Illinois
225 West Randolph Street, 25D
Chicago, Illinois 60606
(312) 727-1444
Counsel

TW TELECOM OF ILLINOIS LLC
BY: TW TELECOM HOLDINGS INC., ITS
SOLE MEMBER



Tina Davis
tw telecom of illinois llc
10475 Park Meadows Drive
Littleton, Colorado 80124
(303) 566-1279
Sr. VP and Deputy General Counsel

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS BELL TELEPHONE COMPANY)
(AT&T Illinois) and)
TW TELECOM OF ILLINOIS LLC)
Joint Petition for Approval of Interconnection) **12 - _____**
Agreement dated October 12, 2012,)
pursuant to 47 U.S.C. § 252)

STATEMENT IN SUPPORT OF JOINT PETITION FOR APPROVAL

I, Patrick Doherty, am Director-Regulatory for AT&T Services, Inc., and submit this Statement in Support of the Joint Petition for Approval of a Interconnection Agreement between tw telecom of illinois llc and AT&T Illinois.

The attached interconnection agreement (the “Agreement”) between Illinois Bell Telephone Company (“AT&T Illinois”) and tw telecom of illinois llc represents AT&T Illinois’ compliance with tw telecom of illinois llc’s statutory rights under Section 252(i) of the Act. Accordingly, AT&T Illinois and tw telecom of illinois llc request approval pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996 (sometimes referred to as the “Act”).

In accordance with Section 252(i) of the Act, tw telecom of illinois llc adopted the terms of the Agreement between AT&T Illinois and Windstream NuVox Illinois, Inc. dated July 23, 2010. The Agreement shall expire May 19, 2013. The key provisions of the Agreement are summarized as follows:

Collocation – Section 251(c)(6)

Collocation will be provided pursuant to the applicable Appendix Collocation.

Database Access

AT&T shall provide tw telecom of illinois llc nondiscriminatory access to databases and associated signaling necessary for call routing and completion pursuant to the applicable Appendix UNE.

Interconnection pursuant to Section 251(c)(2)(A), (B), and (C): 47CFR §51.305(a)(1)

AT&T shall provide to tw telecom of illinois llc Interconnection of the Parties’ facilities and equipment for the transmission and routing of Telephone Exchange Service traffic and Exchange Access traffic pursuant to the applicable Appendix Interconnection Trunking Requirement (ITR).

Number Portability – Section 251(b)(2)

The Parties shall provide to each other Permanent Number Portability (PNP) on a reciprocal basis as outlined in the applicable Appendix Number Portability.

Other Services

- ◆ 911 and E911 Services, AT&T will make nondiscriminatory access to 911 and E911 services available under the terms and conditions of the applicable Appendix 911.
- ◆ AIN, AT&T will provide tw telecom of illinois llc with access to Advanced Intelligent Network (AIN) platform, AIN Service Creation Environment (SCE) and AIN Service Management System (SMS).
- ◆ Directory Assistance (DA), AT&T will provide nondiscriminatory access to DA services under the terms and conditions identified in the applicable Appendix DA.
- ◆ Operator Services (OS), AT&T shall provide nondiscriminatory access to Operator Services under the terms and conditions identified in the applicable Appendix OS.
- ◆ Signaling System 7 Interconnection, AT&T shall perform SS7 Interconnection services for CLEC pursuant to the applicable Appendix SS7.
- ◆ Resale, AT&T shall provide to tw telecom of illinois llc Communication Services for resale at wholesale rates pursuant to the applicable Appendix Resale.
- ◆ Unbundled Network Elements, AT&T agrees to provide tw telecom of illinois llc with those services as required by Section 251(b) and/or 251(c) of the Act, if applicable.
- ◆ Access to Toll Free Calling Database provided by the applicable AT&T - Appendix 800.
- ◆ Digital Subscriber Line (DSL) and the High Frequency Portion of the Loop (HFPL) - Appendix DSL.
- ◆ Terms and conditions under which AT&T and tw telecom of illinois llc will compensate each other for the joint provision of intraLATA Foreign Exchange (FX) Services - Appendix Foreign Exchange.
- ◆ Terms and condition under which Reciprocal Compensation provided by AT&T and tw telecom of illinois llc – Appendix Reciprocal Compensation.

The parties further acknowledge that on April 27, 2001, the FCC released its Order on Remand and Report and Order in CC Dockets No. 96-98 and 99-68, *In the Matter of the Local Competition Provisions in the Telecommunications Act of 1996; Intercarrier Compensation for ISP-bound Traffic* (ISP Intercarrier Compensation Order). By executing and filing the Agreement and carrying out the intercarrier compensation rates, terms and conditions in the Agreement, AT&T Illinois does not waive any of its rights, and expressly reserves all of its rights, under the ISP Intercarrier Compensation Order, including, but not limited to, its right to exercise its option at anytime in the future to invoke the Intervening Law or Change of Law provisions and to adopt, on a date specified by AT&T Illinois, the FCC ISP terminating compensation plan, after which date ISP-bound traffic will be subject to the FCC's prescribed terminating compensation rates, and other terms and conditions.

Under the Act, the Commission may reject the Agreement only if the Agreement or a portion thereof "...discriminates against a telecommunications carrier not a party to the agreement" or "...implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity".

The Agreement is not discriminatory. AT&T Illinois will make this Agreement available to any other telecommunications carrier operating within AT&T Illinois' service territory. Other telecommunications carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

The Agreement is consistent with the public interest, convenience and necessity. It is a comprehensive agreement that tailors the interconnection and service arrangements previously approved by the Commission to meet the individual needs of the parties and thereby will promote local exchange competition -- one of the primary purposes of the Act and a long-standing goal of this Commission. The Agreement will enhance tw telecom of illinois llc's ability to quickly begin providing residential and business subscribers in AT&T Illinois' service territory with a competitive alternative for their local exchange service. Under the Agreement, customers will be able to choose tw telecom of illinois llc instead of AT&T Illinois for their local service, they will be able to change companies without changing telephone numbers, and they will be able to call tw telecom of illinois llc's customers and customers of other LECs without dialing special codes.

The Agreement meets all the requirements of the Act and the Commission should approve it.

STATE OF Colorado)
)
COUNTY OF Douglas)

VERIFICATION

Tina Davis, being first duly sworn, states on oath that she/he is Sr. VP and Deputy General Counsel for tw telecom of illinois llc and that the facts stated in the foregoing Joint Petition for Approval of Interconnection Agreement and Statement in Support are true and correct to the best of his/her knowledge, information and belief.

Tina Davis
Tina Davis

Subscribed and sworn to before me this 4th day of October, 2012

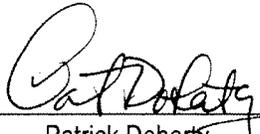
Linda K. Boyle
Notary Public

**LINDA K. BOYLE
NOTARY PUBLIC
STATE OF COLORADO**
My Commission Expires 06/17/2016
19964007128

STATE OF TEXAS)
)
COUNTY OF DALLAS)

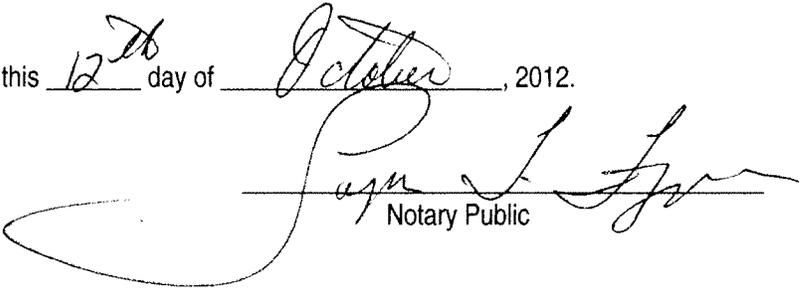
VERIFICATION

Patrick Doherty, being duly sworn, states on oath that he is Director-Regulatory for AT&T Services, Inc., and that the facts stated in the foregoing Joint Petition for Approval of Interconnection Agreement and Statement in Support of Joint Petition for Approval are true and correct to the best of his knowledge, information and belief.



Patrick Doherty

Subscribed and sworn to before me this 12th day of October, 2012.



Notary Public

