

# **Richard T. Howell**Area Manager-Regulatory Relations

AT&T 208 S. Akard St. #2510.02 Dallas, Texas 75202 T: (214)757-8099 F: (214)746-2232 rh2514@att.com www.att.com

October 28, 2021

Ms. Talina R. Mathews
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: Filing of Interconnection Agreement Amendment

Ms. Mathews:

Please find attached to this cover letter the electronic submission of the following filing:

The Amendment to add Data Connection Security Requirements to the ILEC terminating traffic Agreement between AT&T Kentucky and Leslie County Telephone Company, Inc.; Reference No. 01227.

This document is being electronically filed with the Commission on the date of this letter. Please contact me if you have any questions regarding this filing.

Sincerely,

Richard T. Howell

Area Manager-Regulatory Relations

Archal 9. Howell

Attachment

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### **AMENDMENT**

### **BETWEEN**

BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T ALABAMA, AT&T FLORIDA, AT&T GEORGIA, AT&T KENTUCKY, AT&T MISSISSIPPI, AT&T SOUTH CAROLINA AND AT&T TENNESSEE, INDIANA BELL TELEPHONE COMPANY INCORPORATED D/B/A AT&T INDIANA, MICHIGAN BELL TELEPHONE COMPANY D/B/A AT&T MICHIGAN, THE OHIO BELL TELEPHONE COMPANY D/B/A AT&T OHIO, PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA, SOUTHWESTERN BELL TELEPHONE COMPANY D/B/A AT&T OKLAHOMA, WISCONSIN BELL, INC. D/B/A AT&T WISCONSIN

### **AND**

TDS TELECOMMUNICATIONS LLC, ARCADIA TELEPHONE COMPANY DBA: TDS TELECOM; BADGER TELECOM LLC D/B/A TDS TELECOMNUNICATIONS; BLACK EARTH TELEPHONE COMPANY LLC D/B/A TDS TELECOM-BLACK EARTH D/B/A TDS TELECOMMUNICATIONS; BLUE RIDGE TELEPHONE COMPANY; BONDUEL TELEPHONE COMPANY LLC D/B/A TDS TELECOM-BONDUEL D/B/A TDS TELECOMMUNICATIONS;



BURLINGTON BRIGHTON & WHEATLAND TELEPHONE CO LLC D/B/A TDS TELECOM-NEW MUNSTER D/B/A TDS TELECOMMUNICATIONS; BUTLER TELEPHONE COMPANY; CALHOUN CITY TELEPHONE CO. INC.; CAMDEN TELEPHONE AND TELEGRAPH CO., INC; CAMDEN TELEPHONE COMPANY, INC.; CENTRAL STATE TELEPHONE COMPANY LLC D/B/A TDS TELECOM-VESPER D/B/A TDS TELECOMMUNICATIONS: COMMUNICATIONS CORPORATION OF INDIANA; COMMUNICATIONS CORPORATION OF SOUTHERN INDIANA; CONCORD TELEPHONE EXCHANGE, INC.; CONTINENTAL TELEPHONE COMPANY DBA: TDS TELECOM, INC.; DICKEYVILLE TELEPHONE LLC D/B/A TDS TELECOMMUNICATIONS: EASTCOAST TELECOM OF WISCONSIN LLC D/B/A TDS TELECOM-CLEVELAND & VADERS D/B/A TDS TELECOMMUNICATIONS; GRANTLAND TELECOM INC D/B/A TDS TELECOM-FENNIMORE D/B/A TDS TELECOMMUNICATIONS; HAPPY VALLEY TELEPHONE CO. D/B/A TDS TELECOM; HOME TELEPHONE COMPANY OF PITTSBORO, INC; HOME TELEPHONE COMPANY, INC.; HORNITOS TELEPHONE COMPANY D/B/A TDS TELECOM; HUMPHREYS COUNTY TELEPHONE COMPANY; LESLIE COUNTY TELEPHONE COMPANY, INC; LEWISPORT TELEPHONE COMPANY, INC.; LITTLE MIAMI COMMUNICATIONS CORPORATION DBA: TDS TELECOM, INC.; MCCLELLANVILLE TELEPHONE COMPANY DBA: TDS TELECOM, INC.; MID-AMERICA TELEPHONE COMPANY, LLC D/B/A TDS TELECOM/MID-AMERICA TELEPHONE; MID-PLAINS TELEPHONE LLC D/B/A TDS TELECOMMUNICATIONS; MIDWAY TELEPHONE COMPANY LLC D/B/A TDS TELECOM-MEDFORD D/B/A TDS TELECOMMUNICATIONS:

MOSINEE TELEPHONE COMPANY LLC D/B/A TDS TELECOMMUNICATIONS: MT VERNON TELEPHONE COMPANY LLC D/B/A TDS TELECOM-VERONA D/B/A TDS TELECOMMUNICATIONS; MYRTLE TELEPHONE COMPANY, INC.; NELSON-BALL GROUND TELEPHONE COMPANY; NORWAY TELEPHONE COMPANY DBA: TDS TELECOM: OAKMAN TELEPHONE COMPANY: OAKWOOD TELEPHONE COMPANY DBA: TDS TELECOM, INC.; OKLAHOMA COMMUNICATION SYSTEMS, LLC D/B/A TDS TELECOM/OKLAHOMA COMMUNICATION SYSTEMS; PEOPLES TELEPHONE COMPANY; QUINCY TELEPHONE COMPANY; QUINCY TELEPHONE COMPANY D/B/A TDS TELECOM; RIVERSIDE TELECOM LLC D/B/A TDS TELECOM-JOHNSON CREEK D/B/A TDS TELECOMMUNICATIONS; S & W TELEPHONE COMPANY, INC.; SALEM TELEPHONE COMPANY; SCANDINAVIA TELEPHONE COMPANY LLC D/B/A TDS TELECOM-IOLA D/B/A TDS TELECOMMUNICATIONS; SOUTHEAST MISSISSIPPI TELEPHONE CO. INC.; SOUTHEAST TELEPHONE COMPANY OF WISCONSIN LLC D/B/A TDS TELECOM-WATERFORD D/B/A TDS TELECOMMUNICATIONS; ST. STEPHEN TELEPHONE COMPANY; STATE LONG DISTANCE TELEPHONE CO; STOCKBRIDGE & SHERWOOD TELEPHONE COMPANY LLC D/B/A TDS TELECOM-SHERWOOD D/B/A TDS TELECOMMUNICATIONS; TDS TELECOM INC; CHATHAM TELEPHONE COMPANY; COMMUNICATION CORPORATION OF MICHIGAN; ISLAND TELEPHONE COMPANY; SHIAWASSEE **TELEPHONE COMPANY; WOLVERINE TELEPHONE COMPANY;** TELLICO TELEPHONE COMPANY; TENNESSEE TELEPHONE COMPANY: TENNEY TELEPHONE COMPANY LLC D/B/A

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TDS TELECOM-ALMA D/B/A TDS TELECOMMUNICATIONS; THE FARMERS TELEPHONE COMPANY LLC D/B/A TDS TELECOMMUNICATIONS; THE MERCHANTS & FARMERS TELEPHONE COMPANY; TIPTON TELEPHONE COMPANY, INC.; TRI-COUNTY TELEPHONE COMPANY, INC.; UTELCO, LLC D/B/A TDS TELECOM-MONROE D/B/A TDS TELECOM, WAUNAKEE TELEPHONE COMPANY DBA: TDS TELECOM; WAUNAKEE TELEPHONE COMPANY LLC D/B/A TDS TELECOM-WAUNAKEE D/B/A TDS TELECOMMUNICATIONS; WEST POINT TELEPHONE COMPANY, INC.; WILLISTON TELEPHONE COMPANY; WINTERHAVEN TELEPHONE COMPANY D/B/A TDS TELECOM

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Signature:	eSigned - Joei Donmeier	Signature:	eSigned - Kristen E. Shore
Name:	eSigned - Joel Dohmeier	Name:	eSigned - Kristen E. Shore
Title: Dire	(Print or Type) ctor of Government and Regulatory Affairs	Title	(Print or Type)  AVP- Regulatory
Tille. <u>Dire</u>	(Print or Type)	Tille	(Print or Type)
Date:	11 Oct 2021	Date:	12 Oct 2021

**Telecommunications** LLC, Arcadia TDS Telephone Company DBA: TDS Telecom: Badger Telecom LLC d/b/a TDS TELECOM-Neilsville d/b/a TDS Telecommunications; Black Earth Telephone Company LLC d/b/a TDS Earth d/b/a TELECOM-Black TDS Telecommunications: Blue Ridge Telephone Company; Bonduel Telephone Company LLC d/b/a TDS TELECOM-Bonduel d/b/a TDS Telecommunications; Burlington Brighton & Wheatland Telephone Co LLC d/b/a TDS **TELECOM-New** Munster d/b/a **TDS Telecommunications: Butler Telephone** Company; Calhoun City Telephone Co. Inc.; Camden Telephone and Telegraph Co., Inc; Camden Telephone Company, Inc.; Central State Telephone Company LLC d/b/a TDS **TELECOM-Vesper** d/b/a **TDS** Telecommunications: Communications Corporation of Indiana; Communications Corporation of Southern Indiana; Concord Telephone Exchange, Inc.; Continental Telephone Company DBA: TDS Telecom, Inc.; Dickeyville Telephone LLC d/b/a Telecommunications; EastCoast Telecom Of Wisconsin LLC d/b/a TDS TELECOM-Cleveland & Vaders d/b/a TDS Telecommunications; Grantland Telecom Inc d/b/a TDS TELECOMd/b/a TDS Telecommunications: Fennimore Happy Valley Telephone Co. d/b/a TDS TELECOM; Home Telephone Company of Pittsboro, Inc.; Home Telephone Company, Inc.;

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BellSouth Telecommunications, LLC d/b/a AT&T ALABAMA, AT&T FLORIDA, AT&T GEORGIA, AT&T KENTUCKY, AT&T MISSISSIPPI, AT&T SOUTH CAROLINA and AT&T TENNESSEE, Indiana Bell Telephone Company Incorporated d/b/a AT&T INDIANA, Michigan Bell Telephone Company d/b/a AT&T MICHIGAN, The Ohio Bell Telephone Company d/b/a AT&T OHIO, Pacific Bell Telephone Company d/b/a AT&T CALIFORNIA, Southwestern Bell Telephone Company d/b/a AT&T OKLAHOMA, Wisconsin Bell, Inc. d/b/a AT&T WISCONSIN by AT&T Services, Inc., its authorized agent

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Hornitos Telephone Company d/b/a TDS TELECOM; Humphreys County Telephone Company; Leslie County Telephone Company, Inc; Lewisport Telephone Company, Inc.; Little Miami Communications Corporation DBA: TDS Telecom. Inc.; **McClellanville Telephone** Company DBA: TDS Telecom, Inc.; Mid-America Telephone Company, LLC d/b/a Telecom/Mid-America Telephone; Mid-Plains Telephone LLC d/b/a TDS Telecommunications; Midway Telephone Company LLC d/b/a TDS **TELECOM-Medford** d/b/a **TDS** Telecommunications: Mosinee Telephone Company LLC d/b/a TDS Telecommunications; Mt Vernon Telephone Company LLC d/b/a TDS **TELECOM-Verona** d/b/a Mvrtle Telecommunications: Telephone Company, Inc.; Nelson-Ball Ground Telephone Company; Norway Telephone Company DBA: TDS Telecom: Oakman Telephone Company: Oakwood Telephone Company DBA: TDS Inc.; Oklahoma Communication Telecom. Systems, LLC d/b/a TDS Telecom/Oklahoma Communication Systems; Peoples Telephone Company: Quincy Telephone Company: Quincy Telephone Company d/b/a TDS Telecom; Riverside Telecom LLC d/b/a TDS TELECOM-Johnson Creek d/b/a TDS Telecommunications: S & W Telephone Company, Inc.; Salem Telephone Company; Scandinavia Telephone Company LLC d/b/a TDS TELECOM-lola d/b/a TDS Telecommunications: Southeast Mississippi Telephone Co. Inc.; Southeast Telephone Company Of Wisconsin LLC d/b/a TDS **TELECOM-Waterford** d/b/a TDS Telecommunications; St. Stephen Telephone Company: State Long Distance Telephone Co: Stockbridge & Sherwood Telephone Company LLC d/b/a TDS TELECOM-Sherwood d/b/a TDS Telecommunications; **TDS** Telecom Inc: Chatham Telephone Company: of Michigan; Corporation Communication Island Telephone Company; Shiawassee

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Telephone Company; Wolverine Telephone Company; **Tellico** Telephone Company; Tennessee Telephone Company; Tenney Telephone Company LLC d/b/a TDS TELECOM-Alma d/b/a TDS Telecommunications; The Farmers Telephone Company LLC d/b/a FARMERS TELEPHONE COMPANY LLC d/b/a TDS Telecommunications; The Merchants & **Farmers** Telephone Company; **Tipton** Telephone Company, Inc.; **Tri-County** Telephone Company, Inc.; UTELCO, LLC d/b/a **TELECOM-Monroe** TDS d/b/a TDS Vanlue Telecommunications; **Telephone** Company DBA: TDS Telecom; Waunakee Telephone Company LLC d/b/a TDS TELECOM-Waunakee d/b/a TDS Telecommunications; West Point Telephone Company, Inc.; Williston Telephone Company; Winterhaven Telephone Company d/b/a TDS TELECOM

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Version: 07/05/18

# AMENDMENT TO THE AGREEMENT BETWEEN AT&T AND

## TDS TELECOMMUNICATIONS

This amendment ("Amendment") revises the ILEC to ILEC Agreement by and between BellSouth Telecommunications, LLC d/b/a AT&T ALABAMA, AT&T FLORIDA, AT&T GEORGIA, AT&T KENTUCKY, AT&T MISSISSIPPI, AT&T SOUTH CAROLINA, and AT&T TENNESSEE; Indiana Bell Telephone Company Incorporated d/b/a AT&T INDIANA; Michigan Bell Telephone Company d/b/a AT&T MICHIGAN: The Ohio Bell Telephone Company d/b/a AT&T OHIO: Pacific Bell Telephone Company d/b/a AT&T CALIFORNIA; Southwestern Bell Telephone Company d/b/a AT&T OKLAHOMA; and Wisconsin Bell, Inc. d/b/a AT&T WISCONSIN ("AT&T"), (only to the extent that the agent for each such AT&T Inc. owned ILEC executes this Agreement for such AT&T Inc. owned ILEC and only to the extent that such AT&T Inc. owned ILEC provides Telephone Exchange Services as an ILEC in each of the States listed below) and TDS Telecommunications LLC. Arcadia Telephone Company DBA: TDS Telecom; Badger Telecom LLC d/b/a TDS TELECOM-Neilsville d/b/a TDS Telecommunications; Black Earth Telephone Company LLC d/b/a TDS TELECOM-Black Earth d/b/a TDS Telecommunications; Blue Ridge Telephone Company; Bonduel Telephone Company LLC d/b/a TDS TELECOM-Bonduel d/b/a TDS Telecommunications; Burlington Brighton & Wheatland Telephone Co LLC d/b/a TDS TELECOM-New Munster d/b/a TDS Telecommunications: Butler Telephone Company: Calhoun City Telephone Co., Inc.: Camden Telephone and Telegraph Co., Inc.: Camden Telephone Company, Inc.: Central State Telephone Company LLC d/b/a TDS TELECOM-Vesper d/b/a TDS Telecommunications; Communications Corporation of Indiana; Communications Corporation of Southern Indiana; Concord Telephone Exchange, Inc.; Continental Telephone Company DBA: TDS Telecom, Inc.; Dickeyville Telephone LLC d/b/a TDS Telecommunications; EastCoast Telecom Of Wisconsin LLC d/b/a TDS TELECOM-Cleveland & Vaders d/b/a TDS Telecommunications; Grantland Telecom Inc d/b/a TDS TELECOM-Fennimore d/b/a TDS Telecommunications: Happy Valley Telephone Co. d/b/a TDS TELECOM: Home Telephone Company of Pittsboro, Inc; Home Telephone Company, Inc.; Hornitos Telephone Company d/b/a TDS TELECOM; Humphreys County Telephone Company; Leslie County Telephone Company, Inc.; Lewisport Telephone Company, Inc.; Little Miami Communications Corporation DBA: TDS Telecom, Inc.; McClellanville Telephone Company DBA: TDS Telecom, Inc.; Mid-America Telephone Company, LLC d/b/a TDS Telecom/Mid-America Telephone; Mid-Plains Telephone LLC d/b/a TDS Telecommunications; Midway Telephone Company LLC d/b/a TDS TELECOM-Medford d/b/a TDS Telecommunications; Mosinee Telephone Company LLC d/b/a TDS Telecommunications; Mt Vernon Telephone Company LLC d/b/a TDS TELECOM-Verona d/b/a TDS Telecommunications; Myrtle Telephone Company, Inc.; Nelson-Ball Ground Telephone Company: Norway Telephone Company DBA: TDS Telecom: Oakman Telephone Company: Oakwood Telephone Company DBA: TDS Telecom. Inc.; Oklahoma Communication Systems, LLC d/b/a TDS Telecom/Oklahoma Communication Systems; Peoples Telephone Company: Quincy Telephone Company; Quincy Telephone Company d/b/a TDS Telecom; Riverside Telecom LLC d/b/a TDS TELECOM-Johnson Creek d/b/a TDS Telecommunications; S & W Telephone Company; Inc.; Salem Telephone Company; Scandinavia Telephone Company LLC d/b/a TDS TELECOM-lola d/b/a TDS Telecommunications; Southeast Mississippi Telephone Co. Inc.; Southeast Telephone Company Of Wisconsin LLC d/b/a TDS TELECOM-Waterford d/b/a TDS Telecommunications; St. Stephen Telephone Company; State Long Distance Telephone Co; Stockbridge & Sherwood Telephone Company LLC d/b/a TDS TELECOM-Sherwood d/b/a TDS Telecommunications; TDS Telecom Inc; Chatham Telephone Company; Communication Corporation of Michigan; Island Telephone Company; Shiawassee Telephone Company: Wolverine Telephone Company: Tellico Telephone Company: Tennessee Telephone Company: Tenney Telephone Company LLC d/b/a TDS TELECOM-Alma d/b/a TDS Telecommunications: The Farmers Telephone Company LLC d/b/a FARMERS TELEPHONE COMPANY LLC d/b/a TDS Telecommunications; The Merchants & Farmers Telephone Company; Tipton Telephone Company, Inc.; Tri-County Telephone Company, Inc.; UTELCO, LLC d/b/a TDS TELECOM-Monroe d/b/a TDS Telecommunications; Vanlue Telephone Company DBA: TDS Telecom; Waunakee Telephone Company LLC d/b/a TDS TELECOM-Waunakee d/b/a TDS Telecommunications; West Point Telephone Company, Inc.; Williston Telephone Company; Winterhaven Telephone Company d/b/a TDS TELECOM (collectively, TDS Telecommunications) on behalf of itself, its

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parents, and their Affiliates, a Delaware Limited Liability Company (LLC)), ("CARRIER"), in its capacity as an Incumbent Local Exchange Carrier (jointly referred to as "the Parties" and individually as a "Party").

WHEREAS, AT&T and CARRIER are Parties to an ILEC to ILEC Agreement under Sections 251 and 252 of the Communications Act of 1934, as amended (the "Act"), executed December 14, 2020 and as subsequently amended ("Agreement"); and

WHEREAS, the Parties desire to modify certain provisions related to Data Connection Security Requirements; and

**NOW**, **THEREFORE**, in consideration of the promises and mutual agreements set forth herein, the Parties agree to amend the Agreement as follows:

- 1. The Amendment is composed of the foregoing recitals, the terms and conditions, contained within, all of which are hereby incorporated within this Amendment by this reference and constitute a part of this Amendment.
- 2. The Parties agree to add the following language:

### 38.0 DATA CONNECTION SECURITY REQUIREMENTS

- This Agreement incorporates Data Connection Security Requirements by reference, as posted on AT&T Prime Access, as they may be amended from time to time at the discretion of AT&T, and for those listed responsibilities to control in the event of any conflict between the responsibilities and the Agreement.
- In addition, AT&T consents to allow CARRIER to use Connect:Direct for automated file transfers using a stored password that when stored is protected by the use of Strong Encryption and/or one-way hashing based upon Strong Cryptography, without manual log-in into the AT&T systems required.
- 3. This Amendment shall be deemed to revise the terms and provisions of the Agreement only to the extent necessary to give effect to the terms and provisions of this Amendment. In the event of a conflict between the terms and provisions of this Amendment and the terms and provisions of the Agreement (including all incorporated or accompanying Appendices, Addenda, and Exhibits to the Agreement), this Amendment shall govern, provided, however, that the fact that a term or provision appears in this Amendment but not in the Agreement, or in the Agreement but not in this Amendment, shall not be interpreted as, or deemed grounds for finding, a conflict for purposes of this Amendment.
- 4. In entering into this Amendment, neither Party waives, and each Party expressly reserves, any rights, remedies or arguments it may have at law or under the intervening law or regulatory change provisions in the underlying Agreement (including intervening law rights asserted by either Party via written notice predating this Amendment) with respect to any orders, decisions, legislation or proceedings and any remands thereof, which the Parties have not yet fully incorporated into this Agreement or which may be the subject of further review.
- 5. This Amendment shall not modify or extend the Effective Date or Term of the underlying Agreement, but rather, shall be coterminous with such Agreement.
- 6. EXCEPT AS MODIFIED HEREIN, ALL OTHER TERMS AND CONDITIONS OF THE UNDERLYING AGREEMENT SHALL REMAIN UNCHANGED AND IN FULL FORCE AND EFFECT.
- Signatures by all Parties to this Amendment are required to effectuate this Amendment. This Amendment may be executed
  in counterparts. Each counterpart shall be considered an original and such counterparts shall together constitute one and
  the same instrument.
- 8. For Alabama, Florida, Georgia, Indiana, Kentucky, Michigan, Mississippi, Oklahoma, South Carolina, Tennessee: This Amendment shall be filed with and is subject to approval by the applicable state Commission and shall become effective ten (10) days following approval by such Commission. For Ohio: Based on the Public Utilities Commission of Ohio Rules, the Amendment is effective upon filing and is deemed approved by operation of law on the 91st day after filing. For California: Pursuant to Resolution ALJ 257, this filing will become effective, absent rejection of the Advice Letter by the Commission, upon thirty (30) days after the filing date of the Advice Letter to which this Amendment is appended. For Wisconsin: Pursuant to Wisconsin Statute § 196.40, this Amendment shall become effective ten (10) days after the mailing date of the final order approving this Amendment.