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June 1, 2018

Ms. Christine Aarnes  
Chief of Telecommunications  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604-4027

Re: Docket No. 17-SWBT-158-MIS

Dear Ms. Aarnes:

Attached are AT&T Kansas' responses to Staff's DR Nos. 13 and 14 in the above-mentioned docket. DR No. 14 contains Supplemental Responses to DR Nos. 1, 2, 5, 6, 7, 9, 10 and 11.

Please note that AT&T Kansas considers the responsive information to Supplemental RFI No. 6a to be Proprietary/Confidential. This information is being provided subject to the provisions of K.S.A. 66-1220a.

If you have any questions, please contact me on 785-276-6863.

Sincerely,

A handwritten signature in black ink that reads "Janet Arnold".

Attachments

Kansas Docket No. 17-SWBT-158-MIS  
Kansas Corporation Commission Staff  
Request No. 13  
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Answer Date: 06/01/2018  
Company Name: Southwestern Bell Telephone Company

**QUESTION:** AT&T stated in its July 19, 2017, Motion that it needed time to review its census block data to ensure that the CAF Phase II-eligible census blocks assigned to AT&T are, indeed, in AT&T's service territory, and that it would file revised exhibits, as necessary. AT&T stated in footnote 5 of its April 30, 2018 Motion that the census block listing in Exhibit B did not change. Therefore, please provide the following:

- (a) Please explain the results of AT&T's analysis.
- (b) Please explain what, if anything, changed as a result of AT&T's review.

**ANSWER:** (a) As AT&T Kansas mentioned in its Motion for Stay, the Federal Communications Commission (FCC) required AT&T and other carriers to make certain filings in FCC Docket No. 10-90 to enable the FCC to finalize the list of census blocks to be included in the CAF Phase II Auction, in which carriers will bid in a reverse auction for federal funds they will use to provide broadband service to these census blocks.<sup>1</sup> This FCC effort flagged some potential discrepancies between census blocks the FCC's CAF model identified as within a carrier's service territory and census blocks various carriers identified as being within their service territories.

In order to resolve the discrepancies across all states in which AT&T operates, including Kansas, AT&T relied on its own internal mapping software. Previously, AT&T had relied on a third party's proprietary mapping software to generate wire center boundaries it filed at the FCC for some states, including Kansas. AT&T determined, however, there were several advantages to relying on its internal mapping software, including (a) AT&T can make the results of its mapping software available for public inspection and review, (b) its software provides a more accurate depiction of AT&T's wire center boundaries, and (c) there is greater consistency in using the same mapping software across all its states.

The effort to clear up the discrepancies identified by the FCC also necessitated a review of the 904-page list of the census blocks in the "relinquishment area" (*i.e.*, the area where AT&T Kansas is foregoing its

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<sup>1</sup> It is important to distinguish between the "CAF II eligible census blocks" that comprise the area for which AT&T Kansas is retaining its ETC designation and "CAF II Auction" census blocks for which carriers are expected to bid under the FCC's CAF II Auction process.

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ETC designation and will no longer offer the federal Lifeline discount) which AT&T Kansas provided to Staff on December 21, 2016, as Attachment 1 to AT&T's answer to Staff RFI No. 1. AT&T Kansas had utilized the third-party's proprietary mapping software to generate this initial list of census blocks in the relinquishment area.

To be clear, and as AT&T Kansas has explained to Staff, AT&T has no business reason to identify the census blocks in the relinquishment area. Any AT&T Kansas customer (or potential customer) who is not within one of the "retained area" census blocks is, by definition, in the "relinquishment" area and does not qualify for the federal Lifeline discount. AT&T Kansas has no business need to know the census block in which those customers reside.

Nevertheless, because AT&T previously provided Staff a list of "relinquishment area" census blocks, it is updating the data filed previously as Attachment 1 to Staff RFI No. 1. As a result of AT&T's decision to use its internal mapping software everywhere (as opposed to a third party's proprietary mapping software), the list of census blocks in the "relinquishment area" has changed, but not by much. The minimal changes are reflected in AT&T Kansas' Supplemental Answer to RFI No. 1, which shows (i) a revised listing of relinquishment area census blocks, (ii) a list of census blocks that were found to be in AT&T Kansas' service territory that were not included in the initial Attachment 1, and (ii) census blocks that were listed on original Attachment 1, but which were found to be outside the AT&T Kansas service territory.

Please understand that the only changes to the list of census blocks are in the "relinquishment area." The list of census blocks in the "retained area," which AT&T Kansas provided as Exhibit B, has not changed. Specifically, the FCC filings AT&T made to resolve census block discrepancies for the CAF II Auction had no effect on the "retained area" census blocks contained in AT&T Kansas's Exhibit B because that exhibit was first created by using AT&T's internal mapping software. Consequently, there have been no changes to that exhibit.

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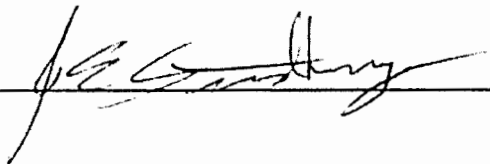
One final note merits emphasis. *This effort to list relinquishment area census blocks has absolutely no impact on any AT&T Kansas customer (or potential customer).* AT&T Kansas services remain available to any customer who qualifies for them, regardless of the census block in which that customer resides. Any qualified customer in the retained area – and remember, the list of retained area census blocks has not changed since AT&T Kansas first filed for ETC relinquishment – can obtain the federal Lifeline discount. Although the list of relinquishment area census blocks has changed somewhat from what was first provided to Staff, AT&T Kansas does not use that list of census blocks to determine if a customer is within the AT&T Kansas service territory. Rather, AT&T Kansas uses wire center boundaries for that purpose. Even though the shift in wire center mapping software resulted in tiny shifts in wire center boundaries, those shifts generally occurred in rural and unpopulated areas. To the best of AT&T Kansas' knowledge, information and belief, no customer has ever been denied AT&T Kansas service because AT&T Kansas incorrectly believed the customer was not in the AT&T Kansas service territory.

- (b) See AT&T Kansas' Supplemental Response to RFI No. 1 and Amended Attachment 1 for the changes to AT&T's relinquishment census blocks.

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Kansas Corporation Commission Staff  
Request No. 13  
RFI No. 13  
Received Date: 5/21/18  
Company Name: Southwestern Bell Telephone Company

VERIFICATION OF RESPONSE

I have read the foregoing Information Request and answer(s) thereto and find the answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to the Information Request.

Signature:  Date: 5/31/18

Printed Name: James E Stidham Jr.

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Request No. 14  
RFI No. 14  
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Answer Date: 06/01/2018  
Company Name: Southwestern Bell Telephone Company

**QUESTION:** Please update all DR responses (1-11) provided in this Docket that need to be updated as a result of AT&T's review or for any other reason

**ANSWER:** AT&T Kansas is providing Supplemental Responses for all or portions of Data Request Nos 1, 2, 5, 6, 7, 9, 10 and 11.

Kansas Docket No. 17-SWBT-158-MIS  
Kansas Corporation Commission Staff  
Request No. 14  
RFI No. 14  
Received Date: 5/21/18  
Company Name: Southwestern Bell Telephone Company

VERIFICATION OF RESPONSE

I have read the foregoing Information Request and answer(s) thereto and find the answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to the Information Request.

Signature: Tanner Arnold Date: 5-31-18

Printed Name: Tanner Arnold