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State Corporation Commission
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July 16, 2018

Ms. Lynn M. Retz
Secretary
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

RE: Southwestern Bell Telephone Company's Section 254(e) Certification, Docket
No. 18-GIMT-394-GIT

Dear Ms. Retz:

Attached via electronic filing with the Commission is a portion of the annual 254(e) certification -- Attachments 1, 6.5, 6.6 and the amount of CAF II support used for capital expenditures in 2017 for Southwestern Bell Telephone Company d/b/a AT&T Kansas, pursuant to the Commission's April 5, 2018 Order in Docket No. 18-GIMT-394-GIT.

The geocoded locations where AT&T Kansas broadband deployment occurred in 2017 have been uploaded to the Universal Service Administrative Company ("USAC") High Cost Universal Broadband ("HUBB") reporting portal.

AT&T Kansas reserves the provisioning of the following information until the Commission issues its findings regarding the Motion of Southwestern Bell Telephone Company for Waiver and Exemption from Certain Filing Requirements filed on June 28, 2018: Attachment 6.1 Network Outages, Attachment 6.2 Unfulfilled Service Requests, Attachment 6.3 Complaints and Attachment 6.4 Quality of Service Wireline Annual Certification.

Questions may be referred to me at (785) 276-6863.

Sincerely,

Attachments

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Chair Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Dwight D. Keen

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 18-GIMT-394-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

SECTION 254(e) CERTIFICATION
FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT
FCC Docket Reference: CC Docket No. 96-45
and KANSAS UNIVERSAL SERVICE FUND SUPPORT
(Please type or print legibly)
(Circle all appropriate support received)

1. My title is Regional President-Western Region of Southwest Bell Telephone Company. In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), Connect America Fund (CAF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding Southwestern Bell Telephone Company d/b/a AT&T Kansas to the statements made in this certification.

2. Southwestern Bell Telephone Company d/b/a AT&T Kansas was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal and KUSF support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by Southwestern Bell Telephone Company d/b/a AT&T Kansas was used in the proceeding calendar year **2017** and will be used in the new calendar year **2019 only** for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

Attachment 1

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

(Pursuant to Kan. Stat. Ann. 53-601.)



Signature

David Nichols

Printed/Typed Name

Executed on 7/16/18 date.

Email address: dn7755@att.com

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

AT&T KANSAS: SEE FORM 481 ATTACHMENT "LINE 610 – DESCRIPTIVE DOCUMENT FOR FUNCTIONALITY IN EMERGENCY SITUATIONS"

ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is _____ of the _____
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding _____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on _____ (date).

Signature

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services throughout the service area for which it has been designated "using media of general distribution."

Please complete the following:

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
AT&T KANSAS: SEE ATTACHED 2017 ADVERTISING INFORMATION			

Line 610 – Descriptive Document for Functionality in Emergency Situations

Section 54.313(a) (6) of the Commission's rules requires an Eligible Telecommunication Carrier (ETC) to certify an ability to function in emergency situations as set forth in Section 54.202(a)(2) of the Commission's rules. The standards set forth in Section 54.202(a)(2) include having a reasonable amount of back-up power to ensure functionality without an external power source, having an ability to reroute traffic around damaged facilities, and having a capability to manage traffic spikes resulting from emergency situations.

All AT&T ILEC central offices are equipped with battery backup equipment. Offices with dedicated standby generators are equipped with sufficient battery capacity to run for approximately four hours without power; offices with access to portable generators have sufficient battery capacity to operate for approximately eight hours without power. The fuel tanks supporting the standby generators are typically sized to supply enough fuel, at three-quarters full fuel capacity, for approximately one to three (or more) days runtime (the continuous operation of the engine alternator set at 100% [full] load).

Each major element of the AT&T network (IP, TDM voice, cellular, etc.) is under the oversight of a Technology Reliability Center (TRC) that manages and controls the network's operation. Technology Reliability Centers are located throughout the United States and are responsible for:

- Proactive 7x24 surveillance of network elements (fault management)
- Progress and event notification to Customer Care Centers
- Asset management (including spare equipment availability)
- Logical configuration management
- Network upgrades and change management
- Direction of the maintenance activities of business partners (including the network field operations force and capacity management).

The AT&T Global Technology Operations Center (GTOC) provides the command and control functions for the TRC organization and serves as the central point of contact for all network and application related traffic and incident management across all of AT&T. The GTOC proactively manages the data and voice traffic flowing across AT&T's domestic and global networks twenty-four hours a day, seven days a week. This proactive network management ensures maximum traffic flow by preventing, minimizing, and/or controlling disruptions to network elements and applications, and impacts to customers. It also performs storm impact reporting to ensure service impacts due to storms are mitigated as rapidly as possible and is prepared to respond to security intrusion related events and finally administers Change Restrictions to reduce risk of change caused disruptions proactively for special events and reactively for emergency conditions.

The GTOC's 3P (Preventive, Predictive, Pro-Active) process collects, identifies, and evaluates the consolidated network view of any high-risk network vulnerabilities to determine if there is a need to develop a mitigation response plan for the network.

- This process is used for National Special Security Events (NSSEs), political conventions, the Olympics, high profile sporting events, and hurricane/storm preparations.
- The mitigation plan is developed to minimize network service affecting incidents with the activation of a managed restoration plan.

- In addition to ensuring a response plan for any adverse events, the team also reviews and addresses issues such as capacity, infrastructure, and physical reliability.

AT&T emergency response teams have extensive experience in planning for and responding to a wide variety of situations, including hurricanes, floods, power outages, earthquakes and man-made disasters. We have a variety of specialist "First Strike" teams with responders that work to restore the AT&T network as quickly and safely as possible. Our Network Disaster Recovery (NDR) program allows a rapid and predictable response to the loss of an entire network office. The program includes specially trained managers, engineers and technicians from across the company, as well as a fleet of more than 320 technology recovery trailers and support vehicles that house the same equipment and components as our data-routing or voice-switching centers. The NDR process and capability has been tested in field exercises several times a year since 1992.

The AT&T Technology Operations Business Continuity Team manages business continuity risks across AT&T's Network and IT technologies and organizations. The scope includes the development and maintenance of business continuity plans and emergency procedures consistent with industry best practices. Our plans are designed to get processes, applications and personnel back to a Business-As-Usual (BAU) state as quickly and safely as possible. The planning process includes incorporating improvement opportunities from previous events into future response activities.

AT&T's Technology Operations Emergency Management Center manages processes, procedures, resources, and teams in response to disasters. This includes up-front prevention and mitigation efforts, as well as executing comprehensive emergency response and recovery plans in the event of a disaster or crisis:

- Business Continuity – development, maintenance, and emergency procedures consistent with industry best practices.
- Disaster Recovery – planning, testing and actual recovery of critical network infrastructure and critical IT infrastructure and applications.

In 2015, AT&T became the first telecom sector company to become certified under the new international Business Continuity Management standard (ISO 22301) for the Voluntary Private Sector Preparedness Program (PS-Prep™). AT&T received its original certification for PS-Prep in 2012. The new ISO standard is the logical successor to the previous standard and became the accepted Business Continuity Management standard worldwide. PS-Prep™ is a partnership between the Department of Homeland Security and the private sector enabling private businesses to demonstrate their capabilities for planning for, responding to, and recovering from disasters and other emergencies.

Based on the foregoing, the reporting carrier certifies it is able to function in emergency situations as set forth in Section 54.202(a)(2).

2017 Kansas Region Audit			
Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Internet			2017
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	01/23/17 - 1/29/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	01/30/17- 2/5/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/06/17- 2/12/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/13/17-2/19/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/20/17-2/26/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/27/17- 3/5/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	03/06/17- 3/12/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	03/13/17-3/19/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	5/1/2017- 5/7/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	05/08/17-5/14/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	05/15/17-5/21/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	05/22/17-5/28/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	06/05/17-6/11/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	06/12/17-6/18/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	06/19/17-6/25/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	07/10/17-7/16/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	07/17/17-7/23/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	07/24/17-7/30/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	07/31/17-8/6/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	08/07/17-8/13/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	08/14/17-8/20/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	08/21/17-8/27/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	08/28/17-9/3/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/04/17-9/10/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/11/17-9/17/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/18/17-9/24/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/25/17-10/1/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	10/02/17-10/8/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	01/23/17-1/29/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	01/30/17-2/5/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/06/17-2/12/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/13/17-2/19/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/20/17-2/26/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	02/27/17-3/5/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	06/12/17-6/18/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	06/19/17-6/25/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	06/26/17-7/2/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	07/24/17-7/30/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	07/31/17-8/6/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	08/21/17-8/27/17

KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	08/28/17-9/3/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/11/17-9/17/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/18/17-9/24/17
KANSAS CITY SPOT TV	SPOT TV	KANSAS CITY DMA	09/25/17-10/1/17
JOPLIN-PITTSBURG PRINT	PRINT	JOPLIN,MO - PITTSBURG,KS	12/14; 12/21; 12/22
KANSAS CITY PRINT	PRINT	KANSAS CITY DMA	12/8; 12/13; 12/16; 12/20
TOPEKA PRINT	PRINT	TOPEKA DMA	12/8; 12/13-12/15
WICHITA PRINT	PRINT	WICHITA DMA	12/11;12/14;12/15; 12/18; 12/21
Kansas	Direct Mail	KANSAS CITY DMA	1/1 - 12/31
KANSAS CITY DJ	DJ	KANSAS CITY DMA	1/30 - 3/19
KANSAS CITY OOH	BULLETINS	KANSAS CITY DMA	1/2-1/22/17
KANSAS CITY OOH	DIGITAL PLACE BASED NETWORKS	KANSAS CITY DMA	1/2-1/22/17
KANSAS CITY OOH	BULLETINS	KANSAS CITY DMA	1/23 - 3/19/17
KANSAS CITY OOH	DIGITAL PLACE BASED NETWORKS	KANSAS CITY DMA	1/23 - 3/19/17
KANSAS CITY OOH	BULLETINS	KANSAS CITY DMA	3/20 -4/16/17
KANSAS CITY OOH	DIGITAL PLACE BASED NETWORKS	KANSAS CITY DMA	3/20 -4/16/17
KANSAS CITY OOH	DIGITAL PLACE BASED NETWORKS	KANSAS CITY DMA	5/22 - 6/18/17
KANSAS CITY OOH	DIGITAL PLACE BASED NETWORKS	KANSAS CITY DMA	6/19 - 25/17
ABS			2017
KANSAS CITY GA SOCIAL	SOCIAL	KANSAS CITY DMA	1/1-12/31
WICHITA GA SOCIAL	SOCIAL	WICHITA DMA	1/1-12/31
JOPLIN-PITTSBURG GA SOCIAL	SOCIAL	JOPLIN,MO - PITTSBURG DMA	1/1-12/31
TOPEKA GA SOCIAL	SOCIAL	TOPEKA DMA	1/1-12/31
KANSAS CITY GA DIGITAL	DIGITAL	KANSAS CITY DMA	1/1-12/31
WICHITA GA DIGITAL	DIGITAL	WICHITA DMA	1/1-12/31
JOPLIN-PITTSBURG GA DIGITAL	DIGITAL	JOPLIN,MO - PITTSBURG DMA	1/1-12/31
TOPEKA GA DIGITAL	DIGITAL	TOPEKA DMA	1/1-12/31
KANSAS CITY GA SEM	SEM	KANSAS CITY DMA	1/1-12/31
WICHITA GA SEM	SEM	WICHITA DMA	1/1-12/31
JOPLIN-PITTSBURG GA SEM	SEM	JOPLIN,MO - PITTSBURG DMA	1/1-12/31
TOPEKA GA SEM	SEM	TOPEKA DMA	1/1-12/31
Lifeline			2017
TOPEKA SPOT RADIO	SPOT RADIO	TOPEKA DMA	09/18/17-9/24/17
WICHITA-HUTCHINSON SPOT RADIO	SPOT RADIO	WICHITA-HITCHINSON DMA	09/18/17-9/24/17

AT&T Kansas Phase II Support

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2017.	\$11,108,866
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