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Filed Date: 06/30/2025  
State Corporation Commission  
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June 30, 2025

Ms. Celeste Chaney-Tucker  
Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604-4027

RE: Southwestern Bell Telephone Company's Section 254(e) Certification, Docket  
No. 25-GIMT-332-GIT

Dear Ms. Chaney-Tucker:

Attached via electronic filing with the Commission is the annual 254(e) certification and the amount of CAF II support used for capital expenditures in 2024 for Southwestern Bell Telephone Company, LLC d/b/a AT&T Kansas, pursuant to the Commission's March 11, 2025 Order in Docket No. 25-GIMT-332-GIT.

AT&T considers Attachment 5.1 Service Outage Reporting to be Proprietary, and it is being provided subject to the provisions of K.S.A. 66-1220a.

Questions may be referred to me at (512) 457-2260.

Sincerely,

A handwritten signature in black ink that reads "Javier Rodriguez". The signature is written in a cursive, flowing style.

Attachments

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

In the Matter of Certification of Compliance )  
with Section 254(c) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 25-GIMT-332-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 Federal and Kansas Support Received)**

1. My title is President of Southwestern Bell Telephone Company, LLC dba AT&T Kansas (Company/Cooperative). In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding Southwestern Bell Telephone Company, LLC dba AT&T Kansas (Company/Cooperative) to the statements made in this certification.

2. Southwestern Bell Telephone Company, LLC dba AT&T Kansas (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by Southwestern Bell Telephone Company, LLC dba AT&T Kansas (Company/Cooperative) was used in the proceeding calendar year 2024 and will be used in the new calendar year 2026 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal Telecommunications Act, and/or Kansas statutes and KCC requirements.

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.)

James D. Jamison  
Signature

James D. Jamison  
Printed/Typed Name

Executed on June, 03 2025 date.

Email address: james.d.jamison@att.com

STATE OF Tennessee  
COUNTY OF Davidson

SWORN TO and Subscribed before me by James D. Jamison  
as this 03<sup>rd</sup> day of June 2025.

Judy C Magill  
Notary Public Signature



## Annual ETC Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)? **(Yes/No)** . **IF YES, PLEASE COMPLETE THE FOLLOWING:**

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected
<b>AT&amp;T KANSAS: SEE CONFIDENTIAL ATTACHMENT 5.1 SERVICE OUTAGE REPORTING</b>					

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

**AT&T KANSAS – 0**

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

**AT&T KANSAS - 0** \_\_\_\_\_

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4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. **Please complete the following, as applicable to your company:**

**QUALITY OF SERVICE WIRELINE 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 complying with required quality of service standards. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) is in compliance with the Commission's quality of service standards as adopted in Docket No. 191,206-U.

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

**QUALITY OF SERVICE WIRELESS 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 complying with required quality of service standards. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) is in compliance with the CTIA Code.

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

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Print / Typed Name

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

**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 (including Lifeline 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 2024 ADVERTISING INFORMATION			

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

**AT&T KANSAS – NA**

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**COMPARABLE LOCAL USAGE PLAN 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 offers a local usage plan comparable to that of the incumbent. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) offers a local usage plan comparable to that of the incumbent.

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





June 4, 2025

Ms. Jen Robertson  
Executive Vice President & General Manager  
of AT&T Mass Markets  
AT&T Mobility  
208 S Akard Street, Suite 433  
Dallas, TX 75202

Dear Jen,

Congratulations! This letter is to notify you that AT&T Mobility ("AT&T") has completed the certification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period of July 1, 2025 through June 30, 2026, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, AT&T is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of AT&T review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. We are providing two specimens (color and black/white) of the Seal for AT&T's use on its website or collateral materials. If you should have any questions concerning the certification process or use of the Seal, please contact Milton Segarra, Counsel, at (202) 736-3687 or [msegarra@ctia.org](mailto:msegarra@ctia.org).

CTIA commends AT&T for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with AT&T on this important industry initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Ajit Pai".

Ajit Pai  
President & Chief Executive Officer

cc: Derek Dickinson, General Attorney  
Timothy G. Johnson, Senior Legal Counsel  
Erinn Robinson, Assistant Vice President – Senior Legal Counsel  
Marian S. Thompson, Lead Compliance Analyst

Attachment



## CONSUMER CODE FOR WIRELESS SERVICE

### CONSUMER CODE CERTIFICATION SEAL

#### TERMS OF USE (2025)

Subject to your compliance with the terms contained herein ("**Terms**"), CTIA-The Wireless Association ("**CTIA**") hereby grants your organization ("**Company**") a non-exclusive, world-wide, royalty-free license ("**License**") to use CTIA's Consumer Code Certification Seal ("**Seal**") to represent that Company voluntarily adopts and adheres to the CTIA Consumer Code for Wireless Service for the period of July 1, 2025 through June 30, 2026 ("**Voluntary Consumer Code**") and has certified such to CTIA. The Seal is attached hereto at Exhibit A and fully incorporated herein by reference.

This License shall become effective immediately upon the date of your receipt of CTIA's written acknowledgement of Company's certification and shall remain in effect until June 30, 2026. CTIA permits the use of the Seal, solely in connection with the Voluntary Consumer Code program. Company may use the Seal in Company's advertising, promotional materials, other literature, or on Company's website(s) to indicate its voluntary compliance with the Voluntary Consumer Code.

Use of the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the Voluntary Consumer Code program. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon the written request of CTIA. Company shall immediately cease use of the Seal upon receipt of CTIA's written notice to do so. If at any time, Company's practices and policies fail to comply, or CTIA has reason to believe that such practices and policies fail to comply with the Voluntary Consumer Code, Company will cease use of the Seal and all rights and permissions will immediately revert to CTIA.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the Voluntary Consumer Code.

Use of the Seal for other purposes than those stated in these Terms is an unauthorized use of the Seal and is strictly prohibited, unless otherwise agreed upon by CTIA in writing.

This License may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these Terms.

EXHIBIT A





May 21, 2025

Ms. Elizabeth King  
Lead – Service Continuity, Engineering & Operations  
AT&T Technology Operations  
AT&T, Inc.  
208 S Akard Street  
Dallas, TX 75202

Dear Elizabeth:

Congratulations! This letter is to notify you that AT&T, Inc. has completed the recertification process for the CTIA Business Continuity/Disaster Recovery Program (“Program”) for the period July 1, 2025– June 30, 2026. CTIA deems AT&T, Inc. is compliant with the principles and objectives of the Program and confirms AT&T, Inc. has recertified that it has implemented and maintained the requirements set forth in the Program.

Please ensure that the relevant employees of AT&T, Inc. are aware of your recertification status. If you should have any questions concerning the certification process, please contact Milton Segarra, Counsel, at [msegarra@ctia.org](mailto:msegarra@ctia.org) or Claudia Tamayo, Executive Coordinator, at [ctamayo@ctia.org](mailto:ctamayo@ctia.org).

CTIA commends AT&T, Inc. for its ongoing leadership and participation in the CTIA Business Continuity/Disaster Recovery Program, and we look forward to continuing to work with AT&T, Inc. on this important industry initiative.

Sincerely,

DocuSigned by:  
  
9947F4ABEF7C417...

Kathryn Dall'Asta  
Vice President and Deputy General Counsel

cc: Cindy Hosey  
Lead – Service Continuity, Engineering & Operations  
AT&T Technology Operation

2024 KANSAS REGION AUDIT					
NAME OF MEDIA	TYPE OF MEDIA	GEOGRAPHIC AREA REACHED	2024 DATES PUBLISHED	PRODUCT CODE	PRODUCT LOB
ALO/GRO/14 - AR GRAND OPENINGS	DISPLAY - PANDORA	KANSAS CITY	10/14-11/24	Grand Openings	Local Mobility
ALO/GRO/15 - AR RELOCATION	DISPLAY - PANDORA	WICHITA-HUTCHINSON PLUS	11/4-12/15	Grand Openings	Local Mobility
ALO/GRO/15 - AR GRAND OPENINGS	SOCIAL - FB/IG	KANSAS CITY	10/14-11/24	Grand Openings	Local Mobility
ALO/GRO/16 - AR GRAND RELOCATION	SOCIAL - FB/IG	WICHITA-HUTCHINSON PLUS	11/4-12/15	Grand Openings	Local Mobility
ALO/GRO/192 - AR GRAND OPENINGS	SPOT RADIO - Particularly DJ	KANSAS CITY	10/7-10/12	Grand Openings	Local Mobility
ALO/GRO/191 - AR GRAND RELOCATION	SPOT RADIO - Particularly DJ	WICHITA-HUTCHINSON PLUS	10/28-11/2	Grand Openings	Local Mobility
ALO/NAT/1 - SAMSUNG EUREKA	OOH	KANSAS CITY	2/12-3/10	Local Mobility - West Region	Local Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	KANSAS CITY	11/29-12/8, 12/18-12/31	Cinema Entertainment	Mass Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	WICHITA-HUTCHINSON PLUS	11/29-12/8, 12/18-12/31	Cinema Entertainment	Mass Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	TOPEKA	11/29-12/8, 12/18-12/31	Cinema Entertainment	Mass Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	JOPLIN-PITTSBURG	11/29-12/8, 12/18-12/31	Cinema Entertainment	Mass Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	TULSA	11/29-12/8, 12/23-12/31	Cinema Entertainment	Mass Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	LINCOLN & HASTINGS-KRNY	11/29-12/8, 12/23-12/31	Cinema Entertainment	Mass Mobility
ATF/CEX/6 - HOLIDAY CINEMA	CINEMA	WICHITA FALLS & LAWTON	11/29-12/8, 12/23-12/31	Cinema Entertainment	Mass Mobility
AIB/LIF/109 - LIFELINE	SPOT RADIO - STATENETS	KS STATEWIDE RADIO NETWORK	8/19/24-8/25/24	Lifeline	Internet
AIB/LIF/110 - LIFELINE	STREAMING	TOPEKA	8/19/24-8/25/24	Lifeline	Internet
AIB/LIF/110 - LIFELINE	STREAMING	WICHITA/HUTCHINSON	8/19/24-8/25/24	Lifeline	Internet

## **AT&T Kansas Phase II Support**

Program ended in 2021, so AT&T Kansas received \$0 in 2024 for CAF Phase II.