

Susan B. Cunningham Counsel

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June 29, 2018

Ms. Lynn M. Retz Secretary to the Commission Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604

Re: Docket No. 18-GIMT-394-GIT

Section 254(e) Certification

Dear Ms. Retz:

Please find the attached copy of Section 254(e) Certification responses on behalf of Cox Kansas Telcom, LLC for filing in the above-referenced docket.

If you have any questions or require additional information, don't hesitate to contact me.

Sincerely,

/s/ Susan B. Cunningham

Susan B. Cunningham Counsel

Attachments

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

1. All ETCs must provide detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 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 CFR 4.5(e).

47 0110 4.5(0	/·		7		
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
2017-01-16	Severe weather conditions from a winter storm caused widespread/extende d duration commercial power outages and plant			Service was recovered by a combination of measures: 1) Commercial power was restored by the local power companies. 2) Maintenance personnel repaired plant damage 3) Cox technicians deployed portable	
09:00:00	damage.	Telephony	Dodge City	generators.	2189
2017-02-16	The cause of the outage was damage to Cox fiber optic cable due to a house fire. The fiber is deployed in a folded ring configuration, and both primary and redundant fibers			The fiber was replaced and spliced to restore	
20:00:00	were damaged.	Telephony	Topeka	service.	3098
2017-03-10 00:35:00	A script used to upgrade the equipment contained incorrect configuration data, which caused the outage.	DS3	Lawrence	Transport upgrade MOP(s) were updated to include steps to validate the integrity of any specially developed scripts.	7
2017-03-17 13:30:00	A work error while performing a remote loopback test on customer a handoff circuit created an unplanned outage condition impacting DS3 circuits.	DS3	Kansas City	Process documentation was enhanced to address a broader configuration suite of product deployment options and unique testing scenarios. The technician was provided training	90

	1		1		
				on the revised	
				process and	
				testing	
				procedures.	
	Construction work			procedures.	
	cut another carrier's			1	
	fiber optic cable. The				
	cable cut impacted				
	only DS3 circuits				
					ľ
	ordered without			1	
	redundancy. All other			1	
	customers routed			1	
	across the damaged			Cox offers circuit	
	fiber failed over to			redundancy,	
	their diverse fiber			however the	1
	route as designed			affected customer	•
2017-03-21	with no service			declined the high	
17:25:00		Dea	V		
17.25.00	impacts.	DS3	Kansas City	availability option.	224
				Permanent fiber	
				repairs were	
	1	1		completed in a	•
	1				
	1			series of non-	
]	[1	service affecting	
	1	[planned	
				maintenance	
	A construction	1		activities. Cox	
		1		1	
	developer cut a fiber			Communications	
	optic cable. Both			continuously	
	working and			reviews and	
	protection fibers			studies the	
				1	
	were deployed in a			feasibility of	
	folded ring			adding further	
	configuration in the			geographically	
	segment where the			redundant paths	
	cut occurred causing			to its network. The	
	the outage condition.			contractor will be	
	All other affected			billed for the	
	fibers failover to their			damages incurred	
	diverse fiber			due to this	
2017-03-22					
	protection route as		ľ	incident due to	
11:16:00	designed.	Telephony	Dodge City	their error.	6
	A planned fiber optic				
	cable bundle				
				1	
	relocation project			1	
	affected DS3 circuits			ĺ	
	purchased without		1	Cox offers circuit	
	available			redundancy.	
	I .				
	redundancy. All other			However the	
	affected fibers failed			affected	
	over to their diverse			customers	
2017-03-24	route path as		1	declined the high	
02:00:00	designed.	DS3	Wichita	availability option.	22
VVV.VV		200	AAICHIE	availability Option.	٤4
	An extended				
	duration commercial				
	power outage at a				
				Services	
	customer premise		i	1	
	customer premise				
0047 67 46	location caused an			recovered after	
2017-05-19	location caused an outage that impacted			recovered after power was	
2017-05-19 03:40:18	location caused an	DS3	Pittsburg		3
	location caused an outage that impacted	DS3	Pittsburg	power was restored.	3
	location caused an outage that impacted	DS3	Pittsburg	power was restored. Cox continuously	3
	location caused an outage that impacted 3 DS3 circuits.	DS3	Pittsburg	power was restored. Cox continuously reviews the	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of	3
	location caused an outage that impacted 3 DS3 circuits.	DS3	Pittsburg	power was restored. Cox continuously reviews the	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and the protection route	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer geographically	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and the protection route fiber deployed in a	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer geographically redundant paths.	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and the protection route	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer geographically	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and the protection route fiber deployed in a folded ring	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer geographically redundant paths. The assessment	3
03:40:18	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and the protection route fiber deployed in a folded ring configuration,	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer geographically redundant paths. The assessment has determined	3
	location caused an outage that impacted 3 DS3 circuits. An animal chew severed a primary fiber optic cable and the protection route fiber deployed in a folded ring	DS3	Pittsburg	power was restored. Cox continuously reviews the feasibility of providing alternate routes to offer geographically redundant paths. The assessment	3

		· · · · · · · · · · · · · · · · · · ·		T .,	·
			1	not be added at	
	A Idahad 65			this location.	
	A kinked fiber				
	introduced during a				
	planned fiber optic				
	cable relocation				
	affected DS3 circuits				
	purchased without		1	Cox offers circuit	
	available			redundancy.	
	redundancy. All other			However the	
	services failed over			affected customer	
2017-06-01	to available			declined the high	
11:11:00	protection.	DS3	Kansas City	availability option.	224
	An unavoidable				
	service affecting				
	maintenance activity				
	to repair fiber optic	1			
	cables was executed				
	per plan in the			Cox continuously	
	maintenance				
	window. The fiber			reviews the	
	3	[feasibility of	
	was deployed in a]		providing alternate	
	folded ring			routes to offer	
	configuration, and	•		geographically	
	both primary and			redundant paths.	
	redundant fibers			The assessment	
	were affected.			determined that	
	Customers were			geographic	
	notified in advance of			redundancy is not	
2017-07-19	the scheduled			a valid option at	
02:44:19	activity.	DS3	Wichita	this location.	60
	A broken fiber				
	caused an outage to				
	DS3 circuits. This				
	fiber route is				
	deployed in a linear			Cox continuously	
	non-protected			reviews the	
	configuration. The	İ		1 .	
	fiber technician			feasibility to	
	1			provide alternate	
	found no indication			routes to offer	
	of vandalism or cable			geographically	
	damage. It is			redundant paths.	
	suspected that			The assessment	
	excessive heat and			has determined	
	environmental			that geographic	
	conditions may have			redundancy will	
2017-07-23	played a role in the			not be added at	
17:23:50	fiber break.	DS3	lola	this location.	23
				Since the circuit	
			1	cleared prior to	
				isolation, the	
	DS3 circuits			circuit was placed	
	purchased without			on monitoring for	
	available redundancy			24 hours. No	
	were affected when			further issues	
	a long-haul fiber			· ·	
				were detected.	
	route failed. All other			Cox offers circuit	
	services failed over			redundancy. The	
	to protection as			affected customer	
	designed. The long			did not choose to	
	haul route restored			accept this high	
2017-08-15	prior to determining			availability	
04:05:00	root cause.	DS3	Lawrence	feature.	448
	The local water utility			Cox continuously	
	was responding to a			reviews the	
	water main break,			feasibility to	
	and cut Cox			provide alternate	
	Communications			routes to offer	
2017-08-25	fiber. The fiber is			geographically	
16:42:00	deployed in a folded	DS3	lola	redundant paths.	348
· · · · · · · · · · · · · · · · · · ·	aspirator in a loided		7014	redundant patris.	J ²

	ring configuration			The assessment	
	along this span, and			determined that	
	both primary and]		geographic	İ
	redundant fibers			redundancy is not	
	were cut.			a valid option at	
			<u> </u>	this location.	
				Cox continuously	
				reviews the	
				feasibility to	
				provide alternate	
				routes to offer	
				geographically	
				redundant paths.	
				The assessment	
	Cox			determined that	
	Communications			geographic	
	fiber was damaged			redundancy is not	
	by a lawn mower,			a valid option at	
	affecting service.			this location. The	
	The fiber is deployed			Cox fiber team	
	in a folded ring			installed a new	
	configuration, and			heavy-duty lid on	
2017-09-14	both primary and			the fiber vault to	
14:01:00	redundant fibers	562		prevent	
14.01.00	were cut.	DS3	Derby	reoccurrence.	31
	Fiber damage affected DS3 circuits				
				0	
	purchased without			Cox offers circuit	
	available			redundancy. The	
	redundancy. All other services failed over			affected customer	
	to available			did not choose to	
2017-09-28	protection as			accept this high	
15:27:00	designed.	DS3	Wichita	availability	أ
[10.21.00	uesigneu.	פפת	AARCHIE	feature.	5

(If necessary, please provide additional pages.)

recipient's s	ervice areas that	requests for service from were unfulfilled during your company attempte	the prior calenda	ar year. If
potential cust			1	
1798				
3. Please proprior calenda		omplaints per 1,000 conn	ections (fixed or n	nobile) in the
<u>.0382</u>	KCC	complaints	per	1,000
lines (FIX	ED)			

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 <u>WIRELINE</u> ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

		of the	Cox Kansas Telcom
LLC (Company/ Cooperative). I			
certify whether the Company/ Cooperative is company/	plying with req	uired quality	of service standards.
am binding Cox Kansas Telcom, LLC			
statements made in this certification.			
2. By this affidavit, I certify that	Cox Kansas Te	elcom, LLC_	(Company
Cooperative) is in compliance with the Commis	ssion's quality	of service s	tandards as adopted in
Docket No. 191,206-U.			
I certify under penalty of perjury under the	he laws of the	state of Kans	as that the foregoing is
true and correct. (Pursuant to Kan. Stat. Ann. 53-6	01.) Executed	on <u>June</u>	25, 2018 (date).
		1/	•
'	Signature		
	Percy Kirk		
	Printed/Typed	Name	
QUALITY OF SERVICE WIREL KCC Docket Reference (Please type of			CATION
(* 18488 15) po c			
1. My title is <u>N/A</u>	of the	N/A	(Company/
1. My title is <u>N/A</u>	on of authority	to certify	whether the Company/
My title is <u>N/A</u> Cooperative). In this capacity, I am in a position	on of authority ality of serv	to certify vice standare	whether the Company/ ds. I am binding
My title isN/A Cooperative). In this capacity, I am in a position Cooperative is complying with required qu	on of authority ality of serv to the statemen	to certify vice standard	whether the Company/ds. I am binding is certification.
My title is N/A Cooperative). In this capacity, I am in a positive Cooperative is complying with required question N/A (Company/Cooperative)	on of authority ality of serv to the statemen	to certify vice standard	whether the Company/ds. I am binding is certification.
My title is N/A Cooperative). In this capacity, I am in a positive Cooperative is complying with required question N/A (Company/Cooperative) 2. By this affidavit, I certify that	on of authority tality of serv to the statemen N/A	to certify vice standards ts made in th	whether the Company/ds. I am binding is certification. Company/ Cooperative)
My title isN/A Cooperative). In this capacity, I am in a positive Cooperative is complying with required quN/A	on of authority lality of serv to the statemen N/A he laws of the s	to certify vice standard ts made in the (C	whether the Company/ds. I am binding is certification. Company/ Cooperative) as that the foregoing is
My title is	on of authority lality of serv to the statemen N/A he laws of the s	to certify vice standard ts made in the (C	whether the Company/ds. I am binding is certification. Company/ Cooperative) as that the foregoing is
My title is	on of authority lality of serv to the statemen N/A le laws of the s 01.) Executed of	to certify vice standard ts made in the (C) tate of Kansa	whether the Company/ds. I am binding is certification. Company/ Cooperative) as that the foregoing is
My title is	on of authority lality of serv to the statemen N/A he laws of the s	to certify vice standard ts made in the (C) tate of Kansa	whether the Company/ds. I am binding is certification. Company/ Cooperative) as that the foregoing is

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).

ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

	1.	My title is	Sr. V	P/GN	<u>1</u>		0	f the _	Cox I	Kansas Telo	om,
LLC			(Company/	Coc	perativ	e). In	this ca	pacity,	I am i	n a positio	n of
author	ity to ce	rtify whether	the Company	y/ Co	operati	ve is ab	le to fu	nction	in an e	nergency.	lam
bindin	gC	ox Kansas Te	lcom, LLC			(Co	mpany/0	Cooper	ative) t	o the statem	ents
made i	n this c	ertification.									
	2.	By this affi	davit, I certi	fy th	iat	Cox	Kansas	Telcor	n, LLC	MILLE II	
(Comp	any/ Co	operative) is o	apable of fu	nctio	ning in	an eme	rgency.				
	I certi	fy under penal	ty of perjury	und	er the la	aws of	the state	e of Ka	ınsas th	at the forego	oing
is tru	ie and	correct.	(Pursuant	to	Kan.	Stat.	Ann,	53-60)1.)	Executed	on
<u> </u>	<u>. 25, 2</u>	<u>2018</u> (dat	e).		_ (6	フ フ	/		' >	
						Sig	nature				
						Percy	Kirk_				
						Pri	nted / T	yped N	ame		

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
www.cox.com	Internet	Statewide-Cox features information regarding rates, eligibility and enrollment information related to Lifeline on its Website.	Daily
Rate Cards	Card/Pamphlet	Provided to customers at time of installation.	Daily
Information Mailer	Letter	Provided to customers that likely qualified for Lifeline program.	9/26/17

(If necessary, please attach additional pages.)

the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.
Cox offers: Cox Digital Telephone Starter, which offers a basic phone line and unlimited local calling for \$21.00 per month. The comparable plan offered by AT&T is \$29.99 per month.
WHO THE REAL PROPERTY AND THE PROPERTY A
COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT
KCC Docket Reference: 06-GIMT-446-GIT
KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly)
KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly) 1. My title is Sr. VP/GM of the Cox Kansas Telcom,
KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly) 1. My title is Sr. VP/GM of the Cox Kansas Telcom, LLC (Company/ Cooperative). In this capacity, I am in a position of authority to
I. My title is Sr. VP/GM of the Cox Kansas Telcom, (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
I. My title is Sr. VP/GM of the Cox Kansas Telcom, (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 Cox Kansas Telcom, LLC (Company/Cooperative)
I. My title is Sr. VP/GM of the Cox Kansas Telcom, LLC (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 Cox Kansas Telcom, LLC (Company/Cooperative) to the statements made in this certification.
KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly) 1. My title is Sr. VP/GM of the Cox Kansas Telcom, LLC (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 Cox Kansas Telcom, LLC (Company/Cooperative) to the statements made in this certification. 2. By this affidavit, I certify that Cox Kansas Telcom, LLC

18-GIMT-394-GIT
Attachment 6

Signature
Percy Kirk
Printed/Typed Name