

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).

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 09:00:00	Severe weather conditions from a winter storm caused widespread/extended duration commercial power outages and plant damage.	Telephony	Dodge City	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 generators.	2189
2017-02-16 20:00:00	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 were damaged.	Telephony	Topeka	The fiber was replaced and spliced to restore 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

				on the revised process and testing procedures.	
2017-03-21 17:25:00	Construction work cut another carrier's fiber optic cable. The cable cut impacted only DS3 circuits ordered without redundancy. All other customers routed across the damaged fiber failed over to their diverse fiber route as designed with no service impacts.	DS3	Kansas City	Cox offers circuit redundancy, however the affected customer declined the high availability option.	224
2017-03-22 11:16:00	A construction developer cut a fiber optic cable. Both working and protection fibers were deployed in a folded ring configuration in the segment where the cut occurred causing the outage condition. All other affected fibers failover to their diverse fiber protection route as designed.	Telephony	Dodge City	Permanent fiber repairs were completed in a series of non-service affecting planned maintenance activities. Cox Communications continuously reviews and studies the feasibility of adding further geographically redundant paths to its network. The contractor will be billed for the damages incurred due to this incident due to their error.	6
2017-03-24 02:00:00	A planned fiber optic cable bundle relocation project affected DS3 circuits purchased without available redundancy. All other affected fibers failed over to their diverse route path as designed.	DS3	Wichita	Cox offers circuit redundancy. However the affected customers declined the high availability option.	22
2017-05-19 03:40:18	An extended duration commercial power outage at a customer premise location caused an outage that impacted 3 DS3 circuits.	DS3	Pittsburg	Services recovered after power was restored.	3
2017-05-30 17:40:00	An animal chew severed a primary fiber optic cable and the protection route fiber deployed in a folded ring configuration, causing the outage condition.	DS3	Derby	Cox continuously reviews the feasibility of providing alternate routes to offer geographically redundant paths. The assessment has determined that geographic redundancy will	5

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

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

(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.

1798

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

.0382 KCC complaints per 1,000 lines (FIXED)

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:

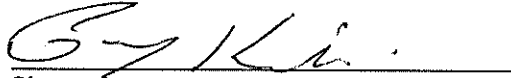
**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION**  
KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is 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 is complying with required quality of service standards. 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 (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 June 25, 2018 (date).



Signature

Percy Kirk

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 N/A of the N/A (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 N/A (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that N/A (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).

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 Signature

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 Print / Typed Name

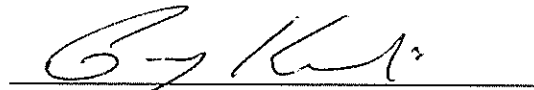
5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

**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. 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 is able to function in an emergency. 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 (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 June 25, 2018 (date).



Signature

Percy Kirk

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
<u>www.cox.com</u>	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.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of 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.

#### COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

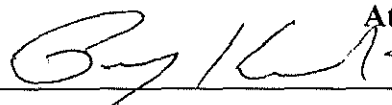
(Please type or print legibly)

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 (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 June 25, 2018 (date).



A handwritten signature in black ink, appearing to read "Percy Kirk", written over a horizontal line.

Signature

Percy Kirk

Printed/Typed Name