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March 17, 2017

Amy L. Green
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

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

Dear Ms. Green:

Attached you will find the Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T Kansas) Motion for Establishment of a Procedural Schedule in order to efficiently and effectively guide this proceeding to a conclusion filed on March 13, 2017 for electronic filing in the above referenced docket.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce A. Ney".

Bruce A. Ney
AVP - Senior Legal Counsel

Attachment

cc: Parties of Record

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Southwestern)
Bell Telephone Company d/b/a AT&T Kansas for)
an Order Confirming Relinquishment of Its Eligible) Docket No. 17-SWBT-158-MIS
Telecommunications Carrier Designation in Specified)
Areas, and Notice Pursuant to K.S.A. 2015 Supp.)
66-2006(d) of Intent to Cease Participation in the)
Kansas Lifeline Services Program.)

**AT&T KANSAS' MOTION
FOR ESTABLISHMENT OF A PROCEDURAL SCHEDULE**

COMES NOW Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T Kansas), pursuant to K.A.R. 82-1-218 and K.A.R 2015 Supp. 82-1-219, and respectfully submits its Motion for Establishment of a Procedural Schedule in order to efficiently and effectively guide this proceeding to a conclusion. In support of its Motion, AT&T Kansas states as follows:

1. AT&T Kansas filed its Application for an Order Confirming Relinquishment of its Designation as an Eligible Telecommunications Carrier (“ETC”) in Specified Areas, and Notice Pursuant to K.S.A. 2015 Supp. 66-2006(d) of Intent to Cease Participation in the Kansas Lifeline Services Program, more than four (4) months ago on October 27, 2016. AT&T Kansas’ Application requested a final Commission Order confirming its ETC relinquishment on or before March 31, 2017.

2. Since the Application was filed, the Commission’s Staff has served a series of detailed discovery requests on AT&T Kansas. AT&T Kansas has responded to each of those requests. At present, however, there is no procedural schedule to guide the instant proceeding to a conclusion by March 31st or any certain date. AT&T Kansas’ requested order date was established to allow for timely customer notice to be given concerning Lifeline matters in order to avoid customer confusion. Recent developments in this proceeding make clear that those

goals may not be achievable. To bring structure to the instant proceeding and hopefully avoid further delay, AT&T Kansas respectfully requests that the Commission order the establishment of a procedural schedule, as described below.¹

3. In an effort to address the concerns that Staff or others may have concerning the Application, AT&T Kansas believes it would be useful to convene an informal meeting of interested parties where meeting participants can raise and discuss any concerns with AT&T Kansas' Application and allow AT&T Kansas to answer questions concerning both the relinquished and retained areas, or any other matters of interest related to AT&T Kansas' Application. AT&T Kansas asks that Staff convene the meeting by April 14, and invite the competitive ETCs, which have been on constructive notice of AT&T Kansas' Application for nearly five months, and CURB, the only intervenor. If Staff prefers, AT&T Kansas can host the meeting at its offices.

4. As AT&T Kansas sees it, the meeting will provide an opportunity for open and frank discussion regarding the AT&T Kansas Application, and any related concerns or issues any party may have. If at the end of the discussion any of the participants still have unanswered questions, they would be able to ask discovery. However, to bring some structure to this proceeding and to move it forward towards a Commission decision, the Commission should direct that any remaining discovery requests must be served no later than ten (10) days after the meeting. At that point discovery will end, absent further order from the Commission.

¹ AT&T Kansas' request for the establishment of a procedural schedule does not in any way pertain to its formal, written notice of intent to cease participation in the Kansas Lifeline Services Program effective May 31, 2017. AT&T Kansas has given the requisite statutory notice of its intent and will cease participation on May 31, 2017 regardless of the status of the instant proceeding concerning its Application.

5. AT&T Kansas further proposes that interested participants file a joint status report after the meeting to propose procedural next steps to complete the proceeding. The due date for the joint status report should be one month after the workshop.

6. Establishing a procedural schedule with firm dates for a meeting of interested parties, a deadline for any remaining discovery, and follow-up joint status report will help focus this proceeding, will provide an opportunity for informal discussions among interested parties, will in all likelihood minimize the number of open issues, and will move the proceeding toward a conclusion.

WHEREFORE, for these reasons, AT&T Kansas respectfully requests that the Commission order the establishment of a procedural schedule, including a meeting on the Application by April 14; a deadline for follow-up discovery (if any) within 10 days of the workshop; and a joint status report with proposed procedural next steps within one month after the workshop.

Respectfully submitted,



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Attorney for Southwestern Bell Telephone
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VERIFICATION

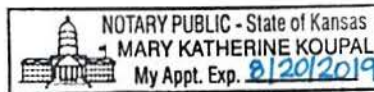
I, Janet L. Arnold, of lawful age, and being first duly sworn, now state: I am Area Manager-External Affairs, and have read AT&T Kansas' Motion for Establishment of a Procedural Schedule, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.


Janet L. Arnold

Subscribed and sworn to before me this 17th day of March, 2017.


Notary Public

My appointment expires:



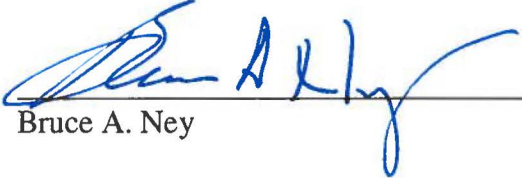
CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing AT&T Kansas' Motion for Establishment of a Procedural Schedule was electronically served this 17th day of March, 2017 to:

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Bruce A. Ney