

715 N.E. 122nd
Oklahoma City, OK 73114



June 26, 2024

Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604

Re: In the Matter of Certification of Compliance with Section 254(e) of the Federal
Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas
Universal Service Fund Support
Docket No. 24-GIMT-612-GIT

Dear Ms. Retz:

Cox Kansas Telcom, LLC respectfully submits for filing the Section 254(e) certification required
by the Commission to be filed in Docket No. 24-GIMT-612-GIT.

Should you have any questions, please contact me via email at Jennifer.tate@coxinc.com or
Leslie McLaughlin at Leslie.mclaughlin@coxinc.com.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jennifer Tate', written over a light gray rectangular background.

Jennifer Tate
Sr. Regulatory Analyst
Cox Kansas Telcom, LLC

Enclosure

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(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 24-GIMT-612-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 Vice President of Government & Regulatory Affairs of
Cox Kansas Telcom, LLC (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 Cox Kansas Telcom, LLC (Company/Cooperative) to the statements
made in this certification.

2. Cox Kansas Telcom, LLC (Company/Cooperative) was named as
an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for
federal
support purposes in Docket No. 21-COXT-245-ETC by order dated
May 20, 2021 and KUSF support purposes in Docket No. N/A by order
dated N/A.

**Docket No. 24-GIMT-612-GIT
Attachment 1**

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 Cox Kansas Telcom, LLC (Company/Cooperative) was used in the proceeding calendar year **2023** and will be used in the new calendar year **2025** *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.)



Signature

Curt Stamp

Printed/Typed Name

Executed on June 25, 2024 date.

Email address: curt.stamp@coxinc.com

**Competitive ETC Investment and Expense
Test for USF Certification**

24-GIMT-612-GIT
Attachment 3a

Company Name : Cox Kansas Telcom, L.L.C.

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R. § 54.314 and KCC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at s.garrett@kcc.ks.gov and h.bhagat@kcc.ks.gov.

Data Year	2023
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	AMOUNT FOR KANSAS	ALLOCATION PERCENT	FUSF CODE (see Notes)	AMOUNT FOR FUSF AREAS (INCLUDE SWBT/AT&T Area if support is received for the area) D=AxB
	A	B	C	
FUSF WORKING LOOPS/LINEAverage No. Customers				
NEW INVESTMENTS:				
1. SWITCHING				
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)		100.00%		
SUBTOTAL NEW INVESTMENTS	\$ [REDACTED]			\$ [REDACTED]
EXPENSES:				
3. SWITCH MAINTENANCE				-
4. OUTSIDE PLANT MAINTENANCE				-
5. NETWORK SUPPORT				-
6. ADMINISTRATIVE EXPENSE				-
SUBTOTAL EXPENSES	\$ -			\$ -
A. TOTAL CASH EXPENDITURES ASSD WITH USF	\$ [REDACTED]			\$ [REDACTED]
B. CERTIFIED FUSF RECEIPTS FOR CETCS				
B1. Frozen High Cost Support				\$ -
B2. Mobility Fund Support				
B3. Rural Broadband Experiments Fund				
B4. CAF II Support				
B5. Rural Digital Opportunity Fund				
B5. Total Certified Federal USF Receipts	\$ [REDACTED]	100.00%		\$ [REDACTED]
C. DO EXPENDITURES EXCEED FUSF RECEIPTS? (negative number means FUSF exceeds Expenditures)	Yes			Yes
	\$ [REDACTED]			\$ [REDACTED]

Notes:
 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
 2) Allocation Codes (describe how the costs are allocated): [the following are examples only, not a complete list.]
 a. Based on number of switched MOUs from USF supported cell sites.
 b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
 c. Based on percent of USF served areas to all areas.

Contact Name: Jennifer Tate Title: Sr. Regulatory Analyst
 Phone No.: 678.645.0222 E-Mail: jennifer.tate@cox.inc.com

Narrative Report for New Investments

ETC Certification for Use of **USF** Support
Provided to the Kansas Corporation Commission

Carrier Name: Cox Kansas Telcom, L.L.C.
Data Year: 2023

Supplemental
Pages

Town or Exchange A	Description of Improvement B	Cash Investment C	Allocation % D	Notes E	Amount Used in the USF Supported Areas F= C x D
Subtotal		\$ -			\$ -

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

(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.

N/A

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

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 VP - Govt. & Regulatory Affairs 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, 2024 (date).



Signature

Curt Stamp

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

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 VP - Govt. & Regulatory Affairs 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, 2024 (date).



Signature

Curt Stamp

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
N/A			

(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.

Cox is currently building its infrastructure to these areas and does not yet have any customers to serve and is still developing its usage plans.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

1. My title is VP - Govt. & Regulatory Affairs 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, 2024 (date).



Signature

Curt Stamp

Printed/Typed Name