

KUTAKROCK

Kutak Rock LLP
1705 Grand Boulevard, Suite 600, Kansas City, MO 64108-2519
office 816.960.0050

Justin M. Nichols
816.502.4644
justin.nichols@kutakrock.com

June 30, 2025

Celoste Chaney-Tucker
Executive Director, Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604

RE: Cox Kansas Telecom L.L.C.
Docket No. 25-GIMT-332-GIT
254(e) Certifications

Dear Ms. Chaney-Tucker:

On behalf of Cox Kansas Telecom L.L.C., attached please find for filing in Docket No. 25-GIMT-332-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 30, 2025 (Attachments 1, 3a, 4, and 5).

In this filing, the entirety of Attachments 3a and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Should you have any questions, please contact Kevin Saltzman at Kevin.Saltzman@kutakrock.com or Chari Lawrence at Chari.Lawrence@coxinc.com.

Sincerely,

Justin M. Nichols

Enclosure

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

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. 25-GIMT-332-GIT

**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 and Regulatory Affairs of Cox Kansas Telecom, L.L.C. (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, Enhanced Alternative Connect America Cost Model (Enhanced ACAM), 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 Telecom, L.L.C. (Company/Cooperative) to the statements made in this certification.

2. Cox Kansas Telecom, L.L.C. (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-245-1/TC by order dated May 20, 2021, and KUSF support purposes in Docket No. N/A by order dated N/A.

Docket No. 25-GTMT-332-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, Enhanced ACAM, RBL, RDOP, and/or KUSF received by Cox Kansas Telecom, L.L.C. (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(c) of the Federal Telecommunications Act, and/or Kansas statutes and RCC 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 30, 2025 date.

Email address: curt.stamp@cox-inc.com

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

25-GIMT-332-GIT
Attachment 3a

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

All CETCs must complete this form to receive certification for its use of USF support pursuant to 47 C.F.R. § 54.314 and RUC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at steve.gazett@ks.gov and hemant.khargat@ks.gov.

**Date
Year** 2024

F (IS) WORKING LOOPS/LINE Average No. Customers

NEW INVESTMENTS:

1. SWITCHING

2. OUTSIDE PLANT (LOCAL LOOPS/CELL SITES)(1)

SUBTOTAL NEW INVESTMENTS

EXPENSES:

3. SWITCH MAINTENANCE

4. OUTSIDE PLANT MAINTENANCE

5. NETWORK SUPPORT

6. ADMINISTRATIVE EXPENSE

SUBTOTAL EXPENSES

A. TOTAL CASH EXPENDITURES ASSO WITH USF

B. CERTIFIED USF RECEIPTS FOR CETCS:

B1. Frozen High Cost Support

B2. Mobility Fund Support

B3. Rural Broadband Expenditure Fund

B4. CAF-II Support

B5. Rural Digital Opportunity Fund

B6. Total Certified Federal USF Receipts

C. DO EXPENDITURES EXCEED FUSF RECEIPTS?

(negative number means FUSF exceeds Expenditures)

No

Notes:

(1) Exclude the cost of transport between switches (distortion and/or burden).

(2) Allocation Codes (describe how the costs are allocated): the following are examples only, not a complete list.

a. Based on number of switched MDUs 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: Chari-Bless Lawrence

Title: Cox Regulatory Affairs Manager

Phone No.: 578-643-0240

E-Mail: Chari.Lawrence@coxinc.com

Narrative Report for New Investments

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

Company Name: Cox Kansas Telecom, LLC

Data Year: 2024

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

NOTES

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255). For CETCs, this amount should match the New Investment Subtotal on Attachment 3a.

Contact: Chari-Elise Lawrence Phone No.: 878-345-0240
Title: Cox Regulatory Affairs Manager E-Mail: Chari.Lawrence@coxinc.com

Narrative Report for New Investments

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

Carrier Name: Cox Kansas Telecom, L.L.C.

Data Year: 2024

Supplemental
Pages

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

**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)?

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
N/A					

(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.

0

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

0

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 Vice President of Government and Regulatory Affairs of the Cox Kansas Telecom, L.L.C. (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 Telecom, L.L.C. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cox Kansas Telecom, L.L.C. (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 30, 2025 (date).


 Signature
Curt Schump
 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 Vice President of Government and Regulatory Affairs of the Cox Kansas Telecom, L.L.C. (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 Telecom, L.L.C. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cox Kansas Telecom, L.L.C. (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. § 601.) Executed on June 30, 2025 (date).



Signature
Curt Stamp

Printed / Typed Name

6. 47 U.S.C. § 214(c)(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
Outreach Letters	Print letters	All areas	December 2024
Outreach Emails	Electronic mail	All areas	December 2024

(If necessary, please attach additional pages.)

7. A competitive LEC 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 Kansas Telecom, L.L.C. offers services through the Lifeline program. Cox began offering RDOF-compliant broadband service including voice/broadband lifeline service to 56 locations in Kansas in December 2024.

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

1. My title is Vice President of Government and Regulatory Affairs of the Cox Kansas Telecom, L.L.C. (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 Telecom, L.L.C. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cox Kansas Telecom, L.L.C. (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 30, 2025 (date).



Signature

Curt Stamp

Printed/Typed Name