

**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 )  
Telecommunications Carrier Designation in Specified ) Docket No. 17-SWBT-158-MIS  
Areas, and Notice Pursuant to K.S.A. 2015 Supp. )  
66-2006(d) of Intent to Cease Participation in the )  
Kansas Lifeline Service Program. )

**COX KANSAS TELCOM, LLC'S PETITION TO INTERVENE**

COMES NOW Cox Kansas Telcom, LLC ("Cox") and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, respectfully petitions the State Corporation Commission of the State of Kansas ("Commission") for intervention in the above-captioned matter. For its Petition to Intervene ("Petition"), Cox states as follows:

1. Cox is a well-established provider of telecommunications, high-speed internet and cable services across much of the state of Kansas. Cox is a designated Competitive Local Exchange Carrier ("CLEC") in good standing in a number of exchanges in Kansas currently served by AT&T and CenturyLink, and is also a Lifeline-only Eligible Telecommunications Carrier ("ETC") in those exchanges in its footprint in which AT&T is the Incumbent Local Exchange Carrier ("ILEC").

2. On October 27, 2016, Southwestern Bell Telephone Company d/b/a AT&T Kansas ("AT&T") filed an Application with the Commission for an order confirming: (a) relinquishment of its ETC designation for the portion of its local exchange service areas in the state of Kansas specified herein, effective May 31, 2017; and (b) its notice of intent to cease participation in the Kansas Lifeline Services Program ("KLSP"), effective May 31, 2017.

3. On March 22, 2017, Commission Staff ("Staff") issued Data Request No. 12 to all competitive ETCs ("CETCs") in Kansas, including Cox, seeking information concerning Cox's

ability to provide service to customers currently served by AT&T. Cox responded to Staff's data request on or about March 31, 2017. As a CETC in Kansas, Cox has a direct interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party. Further, Cox may or will be substantially affected by any Commission order or activity in this proceeding. K.A.R. 82-1-225(a)(2). Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing Cox to intervene. K.A.R. 82-1-225(a)(3).

5. In addition to the undersigned counsel, copies of all pleadings, notices, orders and other documents should be mailed to the following individuals:

Rob Logsdon  
Director, Regulatory Affairs  
Cox Kansas Telcom, LLC  
11505 W. Dodge Road  
Omaha, NE 68154

WHEREFORE, for the above and foregoing reasons, Cox Kansas Telcom, LLC respectfully requests that the Commission grants its Petition to Intervene in this docket.

Respectfully submitted,

/s/ *Susan B. Cunningham*

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*Attorney for Cox Kansas Telcom, LLC*

**VERIFICATION**  
(K.S.A. 53-601)

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF SHAWNEE    )

I, Susan B. Cunningham, being of lawful age and duly sworn, state that I am counsel of record for Cox Kansas Telcom, LLC; I have caused the foregoing Petition to Intervene to be prepared; I have read and reviewed the Petition; and the contents thereof are true and correct to the best of my information, knowledge and belief.

*/s/ Susan B. Cunningham*

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Susan B. Cunningham

Executed on April 19, 2017

**CERTIFICATE OF SERVICE**

A true and correct copy of Cox Kansas Telcom, LLC's Petition to Intervene was served via electronic mail on this 19th day of April, 2017, to the persons appearing on the Commission's service list in Docket No. 17-SWBT-158-MIS, as last modified on April 4, 2017.

*/s/ Susan B. Cunningham*

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Susan B. Cunningham