



Gina Spade
(202) 907-6252
gina@broadbandlegal.com

December 4, 2023

By Electronic Filing

Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 6604-4027

Re: Interconnection Agreement Between Cebridge Telecom KS, LLC d/b/a/ Suddenlink Communications and MoKan Dial, Inc.; In the Matter of the Application of Cebridge Telecom KS, LLC for a Certificate of Convenience Authority to Provide Local Exchange and Exchange Access Service within the State of Kansas.

Docket Nos. 24-CKST-248-IAT; 13-CKST-711-COC

Dear Ms. Retz:

Attached for electronic filing is a Motion to Withdraw the Application for Approval of an Interconnection Agreement between Cebridge Telecom KS, LLC d/b/a Suddenlink Communications (“Cebridge”) and MoKan Dial, Inc. (“MoKan”).

If the Commission has any questions with regard to this filing, please contact the undersigned counsel.

Contact information for Cebridge is listed below:

Jeffrey Harnack
Sr. Director Telecom & Internet
331 North NW Loop 323
Tyler, TX 75702
Phone: 314-616-9812
Fax: 903-504-5337
E-mail: Jeffrev.Harnack@Alticeusa.com

Respectfully submitted,
/s/ Gina Spade
Gina Spade
Counsel for Cebridge Telecom KS, LLC d/b/a
Suddenlink Communications

cc: Anthony M Patrone
Attachment

**Before the
STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS
Topeka, KS 66604**

In the Matter of)	
)	
Interconnection Agreement Between Cebridge)	
Telecom KS, LLC d/b/a/ Suddenlink)	Docket No. 24-CKST-248-IAT
Communications and MoKan Dial, Inc.)	
)	
In the Matter of the Application of Cebridge)	Docket No. 13-CKST-711-COC
Telecom KS, LLC for a Certificate of)	
Convenience Authority to Provide Local)	
Exchange and Exchange Access Service within)	
the State of Kansas.)	

**MOTION TO WITHDRAW THE APPLICATION
OF CEBRIDGE TELECOM KS, LLC D/B/A SUDDENLINK COMMUNICATIONS FOR
APPROVAL OF AN INTERCONNECTION AGREEMENT**

1. Cebridge Telecom KS, LLC d/b/a Suddenlink Communications (“Cebridge”) hereby files this Motion to Withdraw the Application for Approval of an Interconnection Agreement between Cebridge Telecom KS, LLC d/b/a Suddenlink Communications (“Cebridge”) and MoKan Dial, Inc. (“MoKan”).

2. The Application for Approval of an Interconnection Agreement (“Application”) between Cebridge and MoKan was filed on September 11, 2023.

3. Since the filing of the Application, Cebridge has made business decisions regarding its network and the provision of service that negate the need for an interconnection agreement with MoKan. Both Cebridge and MoKan desire the Application to be withdrawn.

4. No party to the matter in this Docket will be unduly burdened or prejudiced by the grant of this Motion to Withdraw.

5. Counsel for Cebridge has discussed this matter with Commission Staff Counsel, and Staff Counsel has indicated that Staff has no objection to the filing of the Motion to Withdraw.

6. Cebridge respectfully requests that the Commission promptly grant the Motion to Withdraw.

Respectfully submitted,

/s/ Gina Spade

Gina Spade

Broadband Legal Strategies, LLC

1118 Rankin Dr

Lawrence, KS 66049

(202) 907-6252

gina@broadbandlegal.com

Counsel for Cebridge Telecom KS, LLC

d/b/a Suddenlink Communications

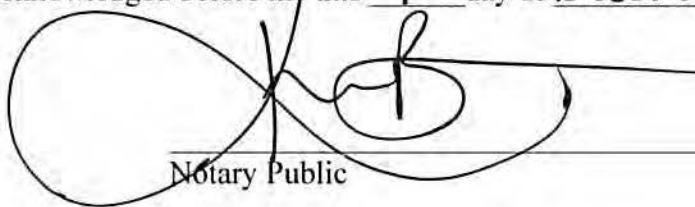
STATE OF TEXAS)
)
SMITH COUNTY)

VERIFICATION

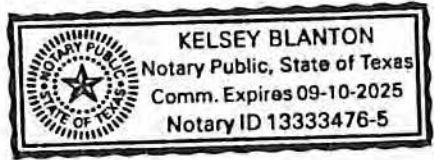
I, Jeffrey A. Harnack, am authorized to represent Cebridge Telecom KS, LLC d/b/a Suddenlink Communications and to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.

Name: Jeffrey A. Harnack
Title: Sr. Director Telecom and Internet

The foregoing instrument was acknowledged before me this 4th day of December 2023.



Notary Public



CERTIFICATE OF SERVICE

I, the undersigned, certify that a true copy of the attached Motion to Withdraw has been served to the following by means of electronic service on December 4, 2023.

ANTHONY K. VEACH
ANTHONY VEACH LAW
1575 BIRDIE WAY, A107
LAWRENCE, KS 66047
anthonyveach@anthonyveachlaw.com

JEFFREY A HARNACK, DIRECTOR
TELECOM & INTERNET
CSC WIRELESS,
LLC D/B/A ALTICE MOBILE
5830 GRANITE PARKWAY
SUITE #600
PLANO, TX 75024
jeffrey.harnack@alticeusa.com

MARK DOTY
GLEASON & DOTY CHTD
401 S MAIN ST STE 10
PO BOX 490
OTTAWA, KS 66067-0490
DOTY.MARK@GMAIL.COM

COLLEEN JAMISON
JAMISON LAW, LLC
P O BOX 128
TECUMSEH, KS 66542
Colleen.Jamison@jamisonlaw.legal

BRETT W. BERRY, LITIGATION
COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.berry@kcc.ks.gov

DAVID COHEN, ASSISTANT
GENERAL COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.cohen@kcc.ks.gov

ANTHONY M PATRONE, COUNSEL
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
555 12th STREET NW
SUITE 1100
WASHINGTON, DC 20004
ampatrone@mintz.com

TAMMY SOUZA, VP OF FINANCE
MOKAN DIAL, INC.
112 S. BROADWAY
PO BOX 429
LOUISBURG, KS 66053-0429
TSOUZA@TOWNES.NET

/s/ Theresa Schrader _____
Theresa Schrader