

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

In the Matter of)	
)	
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 No. 13-CKST-711-COC
)	
)	

MOTION TO DISMISS

1. Cebridge Telecom KS, LLC d/b/a Suddenlink Communications (“Cebridge”) hereby files this Motion to Dismiss the petition filed on September 15, 2023, and the motion filed on December 5, 2023, by several rural telephone companies (“RLECs”) requesting changes to Cebridge’s Certificate of Convenience and Authority issued in 2013.
2. On May 17, 2013, Cebridge filed an application seeking a Certificate of Convenience and Authority to provide local exchange and exchange access service with the Kansas Corporation Commission.¹
3. No party opposed the application. The Kansas Corporation Commission issued an order granting the authorization on August 29, 2013.²

¹ *Application of Cebridge Telecom KS, LLC for a Certificate of Convenience and Authority to Provide Local Exchange and Exchange Access Service Within the State of Kansas*, Docket No. 13-CKST-708-COC, Application for Certificate of Authority to Serve as a Telecommunications Services Provider in Kansas, <https://estar.kcc.ks.gov/estar/ViewFile.aspx/20130521085552.pdf?Id=c048a964-145e-4868-a014-220870154ff4> (May 17, 2013).

² *Application of Cebridge Telecom KS, LLC for a Certificate of Convenience and Authority to Provide Local Exchange and Exchange Access Service Within the State of Kansas*, Docket No. 13-CKST-708-COC, Order and Certificate, <https://estar.kcc.ks.gov/estar/ViewFile.aspx/13-CKST-708->

4. For more than 10 years Cebridge has abided by the terms of the Certificate of Convenience and Authority and all applicable statutes and regulations governing its operation in Kansas.

5. The RLECs do not dispute this or allege that Cebridge has violated any Kansas laws or regulations.³

6. Therefore, there is no need to modify Cebridge's Certificate of Convenience and Authority and the RLECs' request to do so should be dismissed as moot.

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

8. Cebridge respectfully requests that the Commission promptly grant the Motion to Dismiss.

[COC%20AND%2013-CKST-711-COC%20Order.pdf?Id=7008cf5f-b137-44d9-94a3-a6541135311b](https://estar.kcc.ks.gov/estar/ViewFile.aspx/24-248_Order_granting_withdrawal.pdf?Id=c08dc4cb-732b-4dfc-8f9f-f2189aabf5ab)
(Aug. 29, 2013).

³ The RLECs opposed Cebridge's application for approval of an interconnection agreement with MoKan, Inc. but this application has been withdrawn. *Interconnection Agreement Between Cebridge Telecom KS, LLC d/b/a/ Suddenlink Communications and MoKan Dial, Inc.*, Docket Nos. 24-CKST-248-IAT and 13-CKST-711-COC, Order Granting Cebridge Telecom's Motion to Withdraw Its Application for Approval of an Interconnection Agreement, https://estar.kcc.ks.gov/estar/ViewFile.aspx/24-248_Order_granting_withdrawal.pdf?Id=c08dc4cb-732b-4dfc-8f9f-f2189aabf5ab (Dec. 7, 2023).

Respectfully submitted,

A handwritten signature in black ink that reads "Gina Spade". The signature is written in a cursive style and is positioned above a solid horizontal line.

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STATE OF TEXAS)
)
SMITH COUNTY)

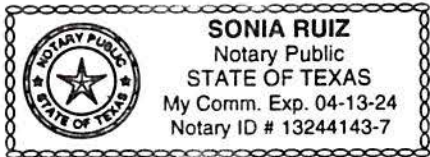
VERIFICATION

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 11th day of December 2023.



Notary Public

[Signature]

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true copy of the attached Motion to Dismiss has been served to the following by means of electronic service on December 11 2023.

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/s/ Theresa Schrader

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