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June 28, 2024

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

RE: **Docket No. 24-GIMT-612-GIT** - In the Matter of Certification of Compliance with Section 245(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support

Dear Secretary:

On behalf of the Combined Brightspeed Kansas ILECs (Brightspeed of Eastern Kansas f/k/a United Telephone Company of Eastern Kansas & Brightspeed of Southern Kansas f/k/a United Telephone Company of Southcentral Kansas; Brightspeed of Kansas f/k/a United Telephone Company of Kansas; and Brightspeed of West Missouri f/k/a Embarq Missouri, Inc. (Kansas)), we are submitting Brightspeed's certification and information supporting its continuing designation as an Eligible Telecommunications Carrier. Attachments 2 and 4 to this filing are submitted as confidential. The attachments contain competitively sensitive commercial and financial information and, as such, disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a.

Please contact me at [lynette.hampton@mossadams.com](mailto:lynette.hampton@mossadams.com) or 512-652-7725 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads 'Lynette Hampton'.

Lynette Hampton  
Authorized Representative for  
Combined Brightspeed Kansas ILECs

cc: Mr. Daniel Ostroff, Manager, Regulatory Reporting  
Combined Brightspeed Kansas ILECs

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 Manager, Regulatory Reporting of Brightspeed. 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 Brightspeed to the statements made in this certification.

2. Brightspeed (*Brightspeed of Eastern Kansas f/k/a United Telephone Company of Eastern Kansas & Brightspeed of Southern Kansas f/k/a United Telephone Company of Southcentral Kansas; Brightspeed of Kansas f/k/a United Telephone Company of Kansas; and Brightspeed of West Missouri f/k/a Embargo Missouri, Inc. (Kansas)*) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997 and KUSF support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997.

**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 Brightspeed 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.)

State of MD, County of Frederick  
Signed before me on this 21<sup>st</sup> day  
of June, 2024 by Daniel Gregory Ostroff  
Notary Public Erin Kilic

Erin Kilic  
My Commission Expires: July 12,  
2027

  
Signature

Daniel G. Ostroff  
Printed/Typed Name

Executed on 6/21/24 date.

Email address: daniel.ostroff@brightspeed.com



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) 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.

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 Manager, Regulatory Reporting of Brightspeed (Brightspeed of Eastern Kansas f/k/a United Telephone Company of Eastern Kansas & Brightspeed of Southern Kansas f/k/a United Telephone Company of Southcentral Kansas; Brightspeed of Kansas f/k/a United Telephone Company of Kansas; and Brightspeed of West Missouri f/k/a Embarq Missouri, Inc. (Kansas)). In this capacity, I am in a position of authority to certify whether the Company is complying with required quality of service standards. I am binding Brightspeed to the statements made in this certification.

2. By this affidavit, I certify that Brightspeed 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 27, 2024.



Signature

Daniel G. Ostroff

Printed/Typed Name

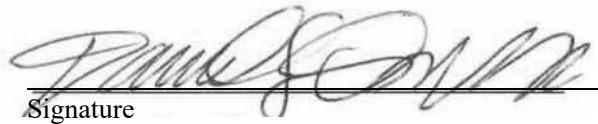
5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 54.202(a)(2).

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is Manager, Regulatory Reporting of Brightspeed (Brightspeed of Eastern Kansas f/k/a United Telephone Company of Eastern Kansas & Brightspeed of Southern Kansas f/k/a United Telephone Company of Southcentral Kansas; Brightspeed of Kansas f/k/a United Telephone Company of Kansas; and Brightspeed of West Missouri f/k/a Embarq Missouri, Inc. (Kansas)). In this capacity, I am in a position of authority to certify whether the Company is able to function in an emergency. I am binding Brightspeed to the statements made in this certification.

2. By this affidavit, I certify that Brightspeed 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 27, 2024.

  
Signature

Daniel G. Ostroff

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
Brightspeed Website	Website	All areas	2023

(If necessary, please attach additional pages.)