

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

SEP 21 2007

In the Matter of a General Investigation to)
Determine Whether the Commission Should)
Require Eligible Telecommunications Carriers)
to Certify That They Have Used Kansas)
Universal Service Fund Support Appropriately)

Docket No. 08-GIMT-154-GIT

 Docket
Room

**INITIAL COMMENTS
OF SOUTHWESTERN BELL TELEPHONE COMPANY**

COMES NOW Southwestern Bell Telephone Company d/b/a AT&T Kansas ("AT&T"), pursuant to the Commission's August 8, 2007 Order Opening Docket and Scheduling Initial Comments in the instant proceeding. In its Order, the Commission invited interested parties to comment on the following issues: the Commission's authority to require certification of the use of Kansas Universal Service Fund ("KUSF") support; what investments and expenses should be included in an examination of use of the KUSF support; what changes to the existing Federal Universal Service Fund forms will be necessary to achieve meaningful certification of KUSF support; and, finally, the consequences of failing to utilize KUSF support appropriately. Accordingly, AT&T comments as follows.

A. Authority to Require Certification of the use of KUSF Support

AT&T concurs with the Commission Staff's Memorandum dated June 28, 2007 concerning the Commission's jurisdiction and authority to require eligible telecommunication carriers ("ETC") to certify that they have used KUSF support appropriately.

B. Investments and Expenses to be Included in Review of KUSF support usage.

AT&T believes that the Commission's existing FUSF certification forms do sufficiently address the investment and expenses necessary to be reviewed for KUSF certification purposes.

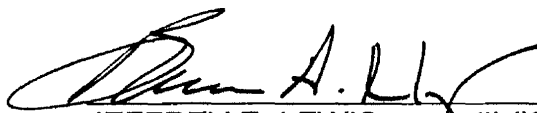
C. Necessary Changes to Existing Forms and Timing of Certification

AT&T does not believe any changes to the existing FUSF certification forms are necessary in order for them to be used in a KUSF certification process. Though the Commission did not expressly invite comments on the timing of a KUSF certification process, AT&T believes that the use of the same forms should facilitate KUSF certification contemporaneously with FUSF certification.

D. Consequences of failing to Utilize KUSF Support Appropriately

AT&T sees no reason why the same remedies available to the Commission if an ETC fails to use FUSF support appropriately would not or should not also be available if an ETC fails to certify its appropriate use of KUSF support. Such a result would appear to be reasonable.

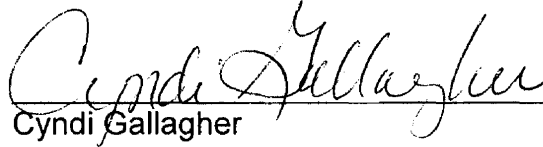
Respectfully submitted,


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VERIFICATION

I, Cyndi Gallagher, of lawful age, and being first duly sworn, now state: I am Director – Kansas Regulatory, and have read Southwestern Bell Telephone Company's Initial Comments, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.


Cyndi Gallagher

Subscribed and sworn to before me this 21st day of September, 2007.




Notary Public

My Appointment Expires: January 26, 2011

CERTIFICATE OF SERVICE

I hereby certify that a correct copy of Southwestern Bell Telephone Company's Initial Comments was sent via U.S. Mail or hand-delivered on this 21st day of September, 2007, to:

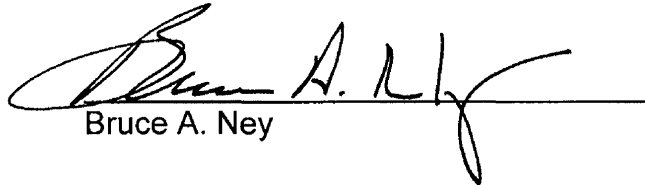
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