

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Audit of Comcast Phone of)
Kansas, LLC by the Kansas Universal Service)
Fund (KUSF) Administrator Pursuant to K.S.A.) Docket No. 18-CPKT-035-KSF
2016 Supp. 66-2010(b) for KUSF Operating Year)
20, Fiscal Year March 2016-February 2017.)

MOTION OF COMCAST PHONE OF KANSAS, LLC
FOR EXTENSION OF TIME

COMES NOW Comcast Phone of Kansas, LLC (“Comcast” or “Company”) and, pursuant to K.A.R. 82-1-217(b), respectfully requests an order of the State Corporation Commission of the State of Kansas (“Commission”) granting Comcast additional time to comply with Audit Finding No. 3, ordered by the Commission in its July 12, 2018 Order Adopting GVNW Consulting, Inc.’s Audit Report and Recommendations. For its Motion, Comcast states as follows:

1. On July 12, 2018, the Commission issued its Order Adopting GVNW Consulting, Inc.’s Audit Report and Recommendations (“Order”). In the Order, the Commission adopted three findings and attendant recommendations identified by GVNW Consulting, Inc. (“GVNW”) in its audit of Comcast for Kansas Universal Service Fund (“KUSF”) Operating Year 20. Comcast has fully complied with Audit Finding Nos. 1 and 2, but requires a modest extension of time to comply with Audit Finding No. 3.

2. Specifically, Audit Finding No. 3 states: “Comcast Phone has not clearly identified the KUSF surcharge on its subscriber's bills. The KUSF surcharge is included in the billing category entitled ‘Regulatory Recovery Fee’ that also includes other federal regulatory fees. Billing fees and surcharges are to be detailed and plainly listed on a customer's bill. The Company is unaware of any obligation applying to its affiliate's VoIP services.” Order at 5

(citations in the original omitted). In order to correct the reporting deficiency noted by GVNW, the Commission ordered Comcast “to clearly identify the KUSF surcharge as a separate line item on a subscriber's bill and provide ten (10) copies of customer bills to GVNW that clearly demonstrate the KUSF surcharge as a separate line item. Once GVNW has received and reviewed the sample customer bills, GVNW will submit a Compliance Report to the Commission.” Id. at 5 and 8.

3. Pursuant to the Order, the required subscriber bills are due to be submitted not later than September 10, 2018. Comcast respectfully requests an additional 21 days, that is until October 1, 2018, to submit the sample invoices in compliance with Audit Finding No. 3.

4. Comcast asserts that it has diligently pursued meeting the deadline for the submission of sample invoices established in the Commission’s Order, but needs additional time to comply. The Commission itself contemplated requesting an extension, stating: “If Comcast Phone is unable to submit the required copies within sixty (60) days from the date of this Order, the Company should file a Motion in this docket requesting an extension of time.” Id. at 8.

5. Pursuant to K.A.R. 82-1-217(b), the Commission, in its discretion, may extend a deadline for good cause shown. Comcast submits that its modest request for an additional 21 days to comply with Audit Finding No. 3 is reasonable given the requirement to modify its billing system in such a way as to set out the KUSF surcharge as a separate line item, generate 10 sample invoices, and submit said invoices to GVNW for review. Additionally, the Commission specifically noted that additional time to comply might be necessary and explicitly stated the Company should file a request for an extension in that event.

6. Comcast, therefore, respectfully requests the Commission exercise its discretion and grant Comcast’s request for an extension of time by which to submit sample invoices to

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

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Motion of Comcast Phone of Kansas, LLC for Extension of Time to be prepared, and that the contents thereof are true and correct to the best of my knowledge, information, and belief.

/s/ Susan B. Cunningham

Susan B. Cunningham

Executed on September 7, 2018

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Motion of Comcast Phone of Kansas, LLC for Extension of Time was electronically served this 7th day of September, 2018, to the parties appearing on the Commission's service list as last modified on July 18, 2018.

/s/ Susan B. Cunningham

Susan B. Cunningham