

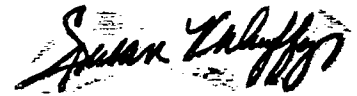
BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

APR 26 2011

In the Matter of the Proceeding to Conduct a Financial )  
and Operational Audit of Kansas Relay Service, Inc.'s )  
("KRSI") Administration of the Dual Party Rely Service )  
and Telecommunications Access Program ("TAP") to )  
Determine that Costs Recovered Through the Kansas )  
Universal Service Fund ("KUSF") for these Programs and )  
Reasonable and Appropriate. )

Docket No. 07-KRST-143-KSF



**PETITION TO INTERVENE**

COMES NOW Kansas Telecommunications Industry Association ("KTIA") by and through its attorney, James G. Flaherty with the law firm of Anderson & Byrd, LLP, and pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, and any and all other applicable statutes and rules and regulations of the Kansas Corporation Commission ("Commission"), petitions the Commission for an order in the above-captioned docket, granting the intervention of KTIA herein and full participation rights to KTIA in this docket. In support of its Petition for Intervention, KTIA states as follows:

**I. INTRODUCTION**

1. KTIA is a trade association that has been serving the Kansas telecommunications industry since 1900. Its offices are located at 4848 SW 21<sup>st</sup> Street, Suite 201, Topeka, Kansas 66604-4415. The members of KTIA are identified in Exhibit A, which is attached hereto and incorporated herein by reference. The members include companies that provide local telephone service and who are regulated by this Commission; long distance companies; wireless companies; and firms and individuals who provide services and products supporting the telecommunications industry in Kansas.

2. Over 20 years ago, the Commission ordered Kansas Relay Service, Inc. ("KRSI"), the non-profit corporation formed by the Commission to perform the day to day administrative functions

relating to the Telecommunications Relay Service ("TRS"), a program providing telecommunications service to the speech and hearing impaired, to enter into a management contract with KTIA, whereby KTIA would perform on behalf of KRSI the day to day management functions required to carry out the provisions of TRS. The Commission required KRSI to enter into a contract with KTIA, which would establish a monthly management fee for the use of KTIA's office space, equipment and personnel. The contract also allowed for the recovery of unusual expenses incurred by KTIA in performing under the contract. The initial management contract between KRSI and KTIA was to be for a term of one year from the date the TRS center would begin operating, and thereafter, the KRSI board of directors could determine whether it wanted to continue using KTIA to manage TRS, or to contract with another entity. See, *In the Matter of a General Investigation Into Dual Party Relay Service in Kansas*, Order, Docket No. 168,334-U, November 1, 1989, paragraphs 13-17 ("November 1, 1989, Order") (referred to by the Commission in its Order Opening Docket in the above-captioned matter dated August 10, 2006, at pages 1-2 ("August 10, 2006 Order")).

3. Nearly 15 years ago, the Commission ordered KRSI to manage the Commission's Telecommunications Access Program ("TAP"), a telecommunications equipment distribution program providing specialized equipment to Kansans with disabilities or impairments in order to access basic home telecommunications services. The Commission determined KRSI should hire a director for TAP and support staff for the program. The Commission further suggested these employees could be hired by KRSI by amending its management contract with KTIA. See, *In the Matter of a General Investigation into a Request by the Kansas Commission for the Deaf and Hard of Hearing to Fund Telecommunications Devices for the Disabled Distribution Program*, Order, Docket No. 194,283-U, January 24, 1997, paragraphs 70-73 ("January 24, 1997, Order") (referred to by the Commission in its August 10, 2006 Order, at page 7).

4. KTIA has administered the TRS and TAP programs, which ensure telecommunications services are available to Kansans with special needs, on behalf of KRSI, since the inception of both of those programs. KTIA has maintained the same structure of its management fee with KRSI (monthly fee) as set forth by the Commission in its November 1, 1989 Order. KTIA has also taken on the responsibility of housing the director and support staff for the TAP program as suggested by the Commission in its January 24, 1997 Order.

5. The administration of the TRS and TAP programs makes up a significant portion of the total work load currently performed by the employees of KTIA. The percentage of the work load attributable to the TRS and TAP programs varies from year to year. The work or functions carried out by each of the employees is as follows:

#### TAP COORDINATOR

The TAP Coordinator administers and manages TAP for the purpose of ensuring TAP consumers receive the services and benefits they desire. He is familiar with the TAP guidelines set forth by the Commission. He reviews, assesses, and processes TAP applications and vouchers for payment accurately and in a timely manner. He communicates directly with, and assists consumers in the selection process of appropriate equipment based on their individual disability or impairment. He maintains positive relationships with consumers, certifying authorities, demonstration site personnel, and equipment vendors to ensure the continued success of TAP. He provides technical assistance, meditation services, customer services, and handles warranty issues that may arise. He assists the Director in maintaining current inventory of all supplies, equipment, and materials for TAP demonstration sites. He assures all files pertaining to TAP are secure and appropriately stored or discarded. He reviews and makes recommendations on updating TAP program literature, materials and website. He performs general office practice duties, filing, answering phone, copying and using

office equipment. He is involved in KRSI/TAP outreach activities, he educates the public, and delivers presentations at professional and consumer organization meetings or events to promote TAP. He provides strategies, proposals and recommendations to the Director for community outreaches. He assists the Director on special issues, projects and/or concerns in the community related to KRSI and TAP. He participates in industry-related and community organizations, attends and participates in all meetings and activities of the KRSI Board and the KRSI Advisory Council. He maintains compliance with KCC order/guidelines and any other requirements for TAP. He assists the Director in complying with various agency and Federal reporting regulations. He interprets all meetings and activities of the KRSI Board and the KRSI Advisory Council and provides interpreting services as needed/requested.

#### PRESIDENT OF KTIA

The President of KTIA serves as the Chairman of the Board of Directors of KRSI for the purpose of ensuring the program operates as intended. His tasks include overseeing and monitoring the administration of KRSI and the TAP.

#### BUSINESS MANAGER OF KTIA/TAP DIRECTOR

She manages bookkeeping and account activities for the purpose of ensuring there is a proper accounting of the financial transactions of KTIA, KRSI, TAP, and the Mid-America Telecommunications Showcase and Seminar ("MATSS"), and makes recommendations to the President. She assures all accounting and tax reports are prepared and filed in a timely manner. She assists the President in preparing an annual budget for all programs. She reviews financial analyses from the Assistant Business Manager of all KTIA meeting receipts and expenses. She monitors expenditures and analyzes spending patterns. She assists the President on special issues and concerns in the community related to KTIA, KRSI, TAP and MATSS. She participates in industry-related and

community organizations. She manages vendors to secure goods and services at a fair price, meet deadlines and support the mission of Association events. She secures dates and contracts for all meetings of KTIA, KRSI, TAP and MATSS. She orders and maintains inventory of all supplies, equipment, and materials for KTIA, KRSI, TAP and MATSS. She assures all files pertaining to KTIA, KRSI, TAP and MATSS are secure and appropriately stored or discarded. She assures insurance paperwork for all entities is filled out and mailed in a timely manner. She assures minutes for all boards are taken and accurate records are kept. She coordinates all activities regarding KTIA, KRSI, KRSI Advisory Council, MATSS and other groups for the purpose of ensuring the business of these entities is conducted. She attends and participates in all meetings and activities of the Association, including the KRSI Board the KRSI Advisory Council and MATSS meetings. She researches appropriate meetings and training classes for KTIA members. She attends appropriate National and Local meetings. She manages staff participation of outreaches for TAP. She provides statistical information for TAP to the KCC and KRSI Board. She provide federal and state agencies with annual statistics on KRSI and TAP. She plans the overall program of KRSI/TAP and its activities to assure standard objectives are met. She develops new initiatives and implements goals to achieve a successful outcome of the programs. She develops an evaluation process to assess the success of the programs and its activities. She monitors and implements procedures for secure record keeping. She ensures compliance with KRSI contract, KCC order/guidelines for KRSI and TAP, and any other requirements related to the above organizations. She oversees the Kansas Relay contract renewal process. She assures compliance with various agency and Federal reporting regulations. She supervises and evaluates the Assistant Business Manager and the TAP Coordinator with adherence to policies and positions to ensure an efficient and timely process of meeting all objectives. She ensures all staff receive orientation, appropriate training and motivation in accordance with

organizational standards. She organizes and operates the office in an efficient manner. She serves as Corporate Secretary for KTIA and KRSI.

ASSISTANT BUSINESS MANAGER OF KTIA

She manages the bookkeeping and financial activities for the purpose of ensuring proper accounting of KTIA, KRSI, TAP, MATSS and the Rural Telecommunications Management Council ("RTMC"). She develops, analyzes and provides reports for the purpose of fiscal analysis, account reconciliations, budget control, projections and organization of operational data. She manages account payables for all entities to ensure invoices/vouchers are accurate and paid in a timely manner. She monitors account receivables to ensure funds are collected in a timely manner. She ensures financial records are accurate, current and updated. She prepares monthly reconciliation of bank accounts. She collects, organizes and prepares data for annual budget development. She provides support for external audits and outside accounting firm. She reviews financial reports generated by outside accounting firm for accuracy. She serves as a resource to the President, Business Manager and Board of Directors for any finance or accounting issues related to the above entities. She assures the integrity and confidentiality of all financial data, current as well as archival. She submits billings for reimbursement from the KUSF. She prepares and make timely deposits of funds received.

She assists the President and Business Manager on special issues, projects and/or concerns in the community related to KTIA, KRSI, TAP and MATSS. She participates in industry-related and community organizations. She orders and maintains inventory of all supplies, equipment, and materials for KTIA, KRSI, TAP and MATSS. She assure files pertaining to KTIA, KRSI, TAP and MATSS are secured and appropriately stored or discarded. She manages the design and maintenance of the KTIA, KRSI and TAP website. She assist in coordinating activities regarding KTIA, KRSI, KRSI Advisory Council, MATSS and other groups for the purpose of ensuring the business of these

entities is conducted. She attends and participates in all meetings/activities of the Association, including the KTIA Board, KRSI Board, KRSI Advisory Council and MATSS meetings. She assists in the overall activities of KRSI/TAP and outreaches to assure standard objectives are met. She assists in developing new initiatives and implements goals to achieve a successful outcome of the programs. She ensure compliance with KRSI contract, Commission order/guidelines for KRSI and TAP, and any other requirements related to the above organizations. She assists in the training of the TAP Coordinator.

6. In addition to the work and functions performed by KTIA's employees for the TRS and TAP programs, the individual members of KTIA also provide the following assistance to the TRS and TAP programs:

- Some of the local telephone companies serve as TAP vendors, assisting in promoting the program, and helping customers with the selection, installation and operation of the equipment;
- Make sure 7-1-1 dialing/ TRS N-1-1 access is programmed in all their exchanges;
- Make sure that the Caller ID information passes through their switches to/from customers;
- Make sure the customers can access their Interexchange carrier (IXC) of choice and that the TRS can access them as well;
- Develop Standard Operating Procedure (SOP) related to working with customers with disabilities and troubleshooting their telecommunications equipment;
- Provide technical assistance as needed;
- Assist in advertising TAP to their customers through bill inserts and newsletters to their customers at no cost to TAP;
- A representative of the rural independent telephone company sits on the KRSI Board; and
- Provide feedback to TAP/TRS program administrators.

## **II. KTIA'S INTEREST IN THE KRSI AUDIT DOCKET**

7. It is KTIA's understanding this docket was opened by the Commission nearly 5 years ago to allow the Commission Staff to conduct a financial and operational audit of KRSI to determine whether the costs incurred in administering the TRS and TAP programs, which are paid out of the Kansas Universal Service Fund ("KUSF"), are reasonable. The Commission directed its Staff to determine (1) whether there has been compliance with previous Commission orders; (2) whether the TAP voucher system and outreach efforts have been efficient; and (3) whether the costs incurred in administering the programs have been reasonable. See, **August 10, 2006 Order, page 12.**

8. On October 25, 2010, the Commission Staff issued a Report and Recommendation in this docket setting forth the results of its audit. ("Report and Recommendation").

9. As indicated by the Commission Staff in its Report and Recommendation, KTIA has cooperated with the Commission Staff in its audit. This has included providing the Commission Staff with all documents it requested, along with providing information through an informal interview process. See, **Report and Recommendation, page 4.**

10. The main concern raised in the Report and Recommendation with respect to the reasonableness of the costs incurred by KRSI to administer the TRS and TAP programs related to how the management fee between KRSI and KTIA was structured, i.e., the use of a fixed monthly management fee. Because of the structure of the management fee, the Commission Staff concluded it could not determine the reasonableness of said fee and suggested the Commission order KRSI to issue a request for proposals ("RFP") in order to select an administrator for the TRS and TAP programs.

11. On November 5, 2010, KRSI filed its response to the Report and Recommendation. KRSI pointed out the structure of the management fee used with KTIA was the one that had been recommended by the Commission in its November 1, 1989, Order, and if the Commission or its Staff



believed a different management fee structure should be used KRSI was amenable to using a different structure. KRSI also raised its concern about the possibility of losing the intangible benefits customers receive under KTIA's administration of the TRS and TAP programs if an administrator is selected through an RFP process. Those benefits included KTIA's 20 plus years of experience in administering the programs and its local ties to Kansas and the customers who are served by the programs. KRSI raised a further concern about facing the unknowns that may come with the selection of an administrator through an RFP process, who would not have the benefit of having administered the programs for the past 20 years and who may not have the local ties to Kansas, and thus not have a special stake in the future success of the programs. KRSI also raised the concern that the use of an RFP process could actually increase the cost to administer the programs and expressed specific concern about the additional cost of developing and conducting an RFP process every 3 to 5 years. KRSI raised a general concern about making changes to something it believed was working well and going down a path that might turn out to be detrimental to the two programs, which have served Kansans with special needs well for the last 20 years. Finally, KRSI suggested there were ways to assure the reasonableness of the management fees charged by KTIA other than to use an RFP process to select the administrator and to run the risk of harming what are admittedly well run and successful programs. KRSI indicated to the Commission that it was willing to work with the Commission Staff regarding that issue.

12. On November 15, 2010, the Commission Staff filed its reply to the comments made by KRSI and reiterated its recommendation that issuing an RFP to select the administrator of the TRS and TAP programs in Kansas was the most prudent action the Commission could take in this matter to assure cost-based fees were being charged to administer the programs. The Commission Staff did not address the other concerns raised by KRSI.

13. On February 28, 2011, the Commission issued an order in this matter. In its order the Commission discussed the positions of Staff and KRSI regarding the structure of the management fee and the fact KRSI was in the process of completing a cost study relating to the monthly management fee. The Commission also identified the disagreement between Staff and KRSI as to two issues relating to the administration of the TAP program. The Commission identified KRSI's disagreement with Staff's assertion it is no longer essential for KRSI to have a connection to the telecommunications industry. Finally, the Commission concluded the cost study being conducted by KRSI should be reviewed before the Commission determined whether an RFP process is the best method to select the administrator of the TRS and TAP programs for Kansas. Specifically, the Commission ordered its Staff to review KRSI's 2010 cost of service study, to determine whether it demonstrated the fees assessed against KRSI by KTIA are cost based, and report its analysis to the Commission, and presumably to KRSI.

14. On March 15, 2011, the Commission Staff filed a petition for clarification or reconsideration of the Commission's February 28, 2011, Order. The Staff clarified its concern related to the way in which the management fee was structured (a monthly fixed fee) and the cost study being conducted by KRSI would not eliminate its concern. Staff concluded the RFP process was the only way to determine whether charges for the administration of the two programs were cost based.

15. On March 25, 2011, KRSI filed a response to the Commission Staff's petition for clarification or reconsideration. KRSI reiterated its willingness to work with the Commission Staff to develop a reasonable cost structure to use regarding the management fee for the two programs and expressed again its policy concerns regarding the use of an RFP process to select the administrator of the two programs given the success KRSI has had with the two programs under its relationship with KTIA.

16. On April 12, 2011, the Commission issued an order in this docket directing the Commission Staff to go forward with the RFP process.

17. KTIA realizes its petition to intervene in this case is coming late in this process. However, KTIA feels strongly the Commission will be doing a dis-service to Kansans, if it does not, at the very least, take a step back and consider whether the "easy answer" or "government/bureaucratic answer" - let's just move forward with an RFP process to select an administrator for what are two very important life-changing programs for some Kansans - is the most prudent answer.

18. KTIA is seeking to intervene in this case because for the past 20 years it has had a real stake in the success of the TRS and TAP programs and because it wishes to continue its involvement in the success of those two programs. After all, it was the Commission that originally selected KTIA to be the administrator of these programs - presumably because the Commission understood the intangible benefits KTIA, and its many rural/local telephone company members, with their direct ties to Kansas and the Kansas customers who would be served by these programs could bring to the table. The purpose of KTIA's request to intervene in this case is to ask the Commission to take a closer look at whether there is the possibility of losing the intangible benefits customers receive under KTIA's administration of the TRS and TAP programs if an RFP process is used to select the administrator of the two programs. Those intangible benefits include KTIA's 20 plus years of experience in administering the programs and its local Kansas ties. Those intangible benefits may be lost if an RFP process is used to select the administrator. KTIA is also asking the Commission to look closer at whether those known and real intangible benefits outweigh facing the unknowns and uncertainties that may come with the selection of an administrator through an RFP process, who will not have the benefit of having administered the programs for the past 20 years and who may not have the local ties to Kansas that gives the administrator a "real" stake, or sense of pride in working for the continued

success of these programs. KTIA is also asking the Commission to take a closer look at whether the use of an RFP process might actually increase the cost to administer the programs and whether the fees resulting from an RFP process are really "cost-based" as suggested by the Commission Staff. KTIA is also asking the Commission to take a closer look at whether relying upon an RFP process to select an administrator could lead down a path that turns out to be detrimental to the two programs, which have served Kansans with special needs well for the last 20 years. KTIA does not believe the Commission or its Staff have taken a close enough look at these issues based upon its review of the pleadings and orders filed in this case to date. KTIA has asked to intervene in this case at this late date because it truly believes in the programs and the benefits that those programs provide and does not want to see any degradation of those programs. KTIA believes a closer look and discussion, and perhaps even a hearing, regarding the above-mentioned policy issues is prudent before making any final decision on how to select an administrator for the TRS and TAP programs.

19. KTIA is also asking the Commission permission to intervene in this case because there have to be other ways to assure the reasonableness of the management fees charged by KTIA other than to use an RFP process to select the administrator, which process might result in disrupting or even harming what are admittedly well run and successful programs, and which process really does not result in cost-based fees as suggested by the Commission Staff. KTIA is asking to intervene in this case in order to work with KRSI and the Commission Staff to come up with a way to determine the reasonableness of the management fee, so Kansans with special needs will not be negatively impacted if a new administrator selected through an RFP process does not work out for whatever reason. KRSI has indicated in its pleadings it is willing to work with Staff to come up with a way to determine the reasonableness of the management fee. KTIA is likewise willing to work with the Commission Staff to come up with a method to determine the reasonableness of the management fee.

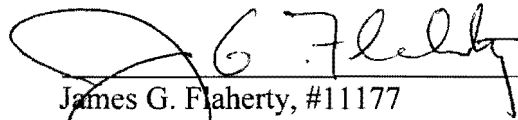
For example, one way the Commission could determine whether the existing management fee was reasonable would be to compare the costs incurred by KRSI to administer the TRS and TAP programs with the costs being incurred to administer the TRS and TAP programs (on a per customer basis) in other similarly situated states.

20. KTIA's intervention at this point in the docket will not prejudice any of the parties. KTIA has conferred with both KRSI and Staff and both have indicated they have no objection to KTIA's intervention. KTIA's intervention will also not impair the prompt and orderly conduct of the proceedings in this matter. If the Commission were to grant the requests for reconsideration in this matter and either establish a process whereby the parties are asked to confer and determine whether there are methods other than an RFP process that could be used to assure the reasonableness of the management fee charged for administering the two programs, or set this matter for an evidentiary hearing or oral arguments to determine whether the intangible benefits received by Kansans as a result of KTIA's administration of the TRS and TAP programs outweigh the use of an RFP process to select an administrator, and whether the management fee charged for administering the program is reasonable, KTIA's input under either process would be useful and helpful and not prejudicial to either the parties or the Commission in reaching a final decision in this matter. If the Commission decides not to conduct any further proceedings in this matter, allowing KTIA's intervention in this case will allow the Commission the benefit of receiving and considering the comments included in KTIA's petition for reconsideration.

21. The Commission has broad discretion to grant a petition to intervene if it is in the interests of justice, if the intervention will not impair the orderly and prompt conduct of the proceedings, and if the party has stated facts demonstrating the legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding. K.S.A. 77-521(a);

K.A.R. 82-1-225. KTIA relies upon the assertions contained herein to support its request for intervention.

WHEREFORE, pursuant to any and all applicable provisions of Chapter 66 and 77 of the Kansas Statutes Annotated, and Article 82 of the Kansas Administrative Regulations, KTIA moves the Commission for an Order granting its petition for intervention in this proceeding, including but not limited to the full and complete rights of discovery, to participate in all hearings, including the presentation of evidence, cross-examination, presentation of arguments, the submission of briefs and other pleadings, and all other activities and procedures available to the parties in this docket.

A handwritten signature in black ink, appearing to read "J. G. Flaherty", is written over a horizontal line.

James G. Flaherty, #11177

**ANDERSON & BYRD, LLP**

216 S. Hickory, P. O. Box 17

Ottawa, Kansas 66067

(785) 242-1234, telephone

(785) 242-1279, facsimile

[jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com)

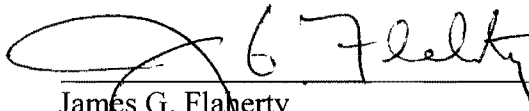
Attorneys for KTIA

**VERIFICATION**

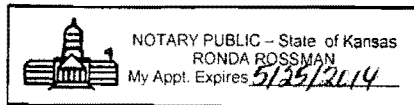
STATE OF KANSAS            )  
  )ss:  
COUNTY OF FRANKLIN    )

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Kansas Telecommunications Industry Association, named in the foregoing Petition to Intervene, and is duly authorized to make this affidavit; that he has read the foregoing Petition to Intervene and knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
James G. Flaherty

SUBSCRIBED AND SWORN to before me this 26<sup>th</sup> day of April, 2011.



  
\_\_\_\_\_

Notary Public

Appointment/Commission Expires:

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 26<sup>th</sup> day of April, 2011, addressed to:

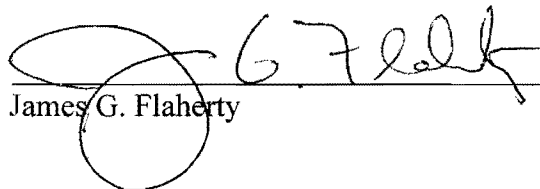
ROBERT A. FOX  
FOX LAW LLC  
2107 SW VILLAGE HALL RD  
TOPEKA, KS 66614-5014

JEFF GOUGH  
CONSULTING MGR  
GVNW CONSULTING, INC.  
3220 PLEASANT RUN SUITE A  
SPRINGFIELD, IL 62711

DAVE WINTER  
GVNW CONSULTING, INC.  
2270 LA MONTANA WAY  
PO BOX 25969  
COLORADO SPRINGS, CO 80936

COLLEEN HARRELL  
LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD ROAD  
TOPEKA, KS 66604-4027

JOYCE HIGHTOWER  
KRSI/TAP DIRECTOR  
KANSAS RELAY SERVICE, INC. (KRSI)  
4848 SW 21ST STREET, SUITE 201  
TOPEKA, KS 66604-4415

  
\_\_\_\_\_  
James G. Flaherty



## EXHIBIT A

### KTIA 2011 MEMBERS

3M  
Alexicon  
Allen, Gibbs & Houlik  
American Products  
ANPI/Zone Telecom  
ATNI  
Badger Communications  
Bob Hull, Inc.  
Border States  
Butler Communications  
Calix  
CBM  
Columbus Telephone Company  
CommSoft  
Corning Cable Systems  
Cox Business  
Cunningham Telephone Company  
Ditch Witch of Kansas  
DRAKA  
Elkhart Telephone Company  
Enablence Systems  
Ericsson  
Finley Engineering Company  
FishNet Security  
Fred Williamson & Associates  
FS3, Inc.  
Fujitsu Network Communications  
Gleason & Doty, Chartered  
Goldfield Telecom  
Gorham Telephone Company  
Graybar  
H & B Communications, Inc.  
Hanson Directory Service  
Home Telephone Company  
HunTel Engineering  
IMC Networks  
Innovative Systems  
ISPN  
KanOkla Telephone  
Kennedy and Coe  
Kiesling Associates

KITUSA  
Legasus Group  
Madison Telephone, LLC  
Mapcom Systems  
MetaSwitch  
Mid America Computer Corp. (MACC)  
Minerva Networks  
Mize, Houser and Company  
Moundridge Telephone Company  
MP Nexlevel  
Mutual Telephone Company  
National Farmers Union Insurance  
NECA  
Network Integration Services  
Pay DQ  
Power & Tel  
REDCOM  
RVW  
S & T Telephone Coop.  
Sartain Fischbein & Company  
Shields Environmental  
South Central Telephone  
Stonehouse Signs  
Stutler Technologies  
TAQUA  
TCA  
Telcom Insurance Group  
Telcom Support Services  
TelQuip  
Totah Telecommunications  
Tri-County Telephone  
Twin Valley Telephone Company  
Walker & Associates  
Wamego Telephone Company  
Warinner, Gesinger & Associates  
Western Extralite  
Westfield Energy  
Wheat State Telephone Company  
Wilson Telephone Company  
Zenda Telephone Company