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July 2, 2018

Ms. Lynn M. Retz Secretary to the Commission Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027

Re: Docket 18-GIMT-394-GIT

Dear Ms. Retz,

We are enclosing the FCC Section 254(e) certification form for Federal Universal Service Support in the above referenced docket for LR Communications, Inc. d/b/a Mutual TeleCommunications (MTC).

We are filing Attachment 3a proprietary and confidential under seal. MTC believes that the information contained in Attachment 3a is of such competitive sensitivity that its disclosure to any person other than MTC, the Commission, and Staff is prohibited by K.S.A. 66-1220(a). Disclosure of trade secrets and confidential information to any person, including parties to this proceeding, is prohibited unless the Commission finds the disclosure is warranted, after considering all of the factors in that statute. The carrier believes that disclosure of the information contained in Attachment 3a would have a significant and adverse impact on its competitive stance regarding existing or potential competing entities including wireless carriers, competitive local exchange carriers, and incumbent local exchange carriers. Regulatorily mandated disclosure of any or all of the subject information would create a competitive bias in favor of any actual or potential competitor not required to provide comparable information, reducing or eliminating any benefit to consumers otherwise resulting from unbiased competition and damaging the submitting company's ability to engage in fair competition.

Please feel free to give me a call if you have any questions.

Very truly yours

Mark E. Caplinger Attorney for Mutual TeleCommunications

Enclosures MEC/njm

Cc: John Tietjens

THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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Chair Shari Feist Albrecht

Commissioner Jay Scott Emler

Commissioner Pat Apple

In the Matter of Certification of Compliance)		
with Section 254(e) of the Federal)		
Telecommunications Act of 1996 and)	Docket No.	18-GIMT-394-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 appropriate support received)

- 1. My title is <u>President and General Manager</u> of <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u>. In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), Connect America Fund (CAF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding <u>LR Communications</u>. <u>Inc. dba Mutual Telecommunications</u> to the statements made in this certification.
- 2. <u>LR Communications, Inc. dba Mutual Telecommunications</u> was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. <u>13-LRCC-124-ETC</u> by order dated <u>January 2, 2013</u> and KUSF support purposes in Docket No. <u>13-LRCC-124-ETC</u> by order dated <u>January 2, 2013</u>.
- 3. By this affidavit, I certify that the USF, CAF and/or KUSF received by <u>LR</u>

 <u>Communications</u>. Inc. dba Mutual Telecommunications was used in the proceeding calendar year <u>2017</u> and will be used in the new calendar year <u>2019</u> only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

I certi	fy under	penalty	v of	perjur	y under	the	laws	oft	he	state	of	Kansas	that	the	forégoing	z is	true	and	correc	it.

(Pursuant to Kan. Stat. Ann. 53-601.)

Signature

John Tietjens Printed/Typed Name

Executed on 6/22/18 date.

Email address: jtietjens@mtc4me.com

Annual ETC Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT

that term is defi in which an eli operates, leases	ined in 47 CFR gible telecomm , or otherwise ut	4.5, of at leas unications ca ilizes that pot	at 30 minutes in arrier is design entially affect:	ge in the prior can n duration for ea lated for any fact (i) at least 10% of facility as defi	ich service area cilities it owns, of the end users
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
None					

(If necessary, please provide additional pages.)

recipient's service area	number of requests for service from potential customers within the is that were unfulfilled during the prior calendar year. If applicable, your company attempted to provide service to those potential
customers.	
None	
3. Please provide the n prior calendar year. None	umber of complaints per 1,000 connections (fixed or mobile) in the

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 <u>WIRELINE</u> ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly)

	1.	My	title is	President a	ind	General]	Manag	er of	the LR Communicat	ions, I	nc. db	a Mutual
Telec	ommunic	ations.	In th	is capacity	, I a	ım in a p	ositio	n of a	uthority to certify w	hether	the C	ompany/
Соор	erative is	comply	ying v	vith require	d qı	ality of	service	stanc	dards. I am binding	LR Co	mmun	ications.
Inc. d	ba Mutua	al Telec	comm	unications	to t	ne staten	nents n	nade i	n this certification.			
	2	Rv	this	affidavit	1	certify	that	I D	Communications	Inc	dha	Mutual

2. By this affidavit, I certify that <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u> 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 6/22/18 (date).

Signature

John Tietjens

Printed/Typed Name

QUALITY OF SERVICE <u>WIRELESS</u> ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly)

1.	My title is		of the		(Company/
Cooperative).	In this capacity, I a	m in a position of	authority to	certify wheth	er the Company/
Cooperative	is complying with	required quality	of service	standards.	I am binding
-	(Company/C	Cooperative) to the s	tatements ma	de in this certif	fication.
2.	By this affidavit, I ce	ertify that		(Company/	Cooperative) is in
compliance w	ith the CTIA Code.				
I certi	ify under penalty of perj	jury under the laws	of the state of	Kansas that the	e foregoing is true
and correct. (Pursuant to Kan. Stat. A	Ann. 53-601.) Exec	uted on	·	(date).
		4	Signature		The same desired desired
			Digitata		

18-GIMT-394-GIT Attachment 6

Print / Typed Name

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 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 <u>President and General Manager</u> of the <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u>. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u> to the statements made in this certification.
- 2. By this affidavit, I certify that <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u> 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

Signature

John Tietjens

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its 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		
Website	Internet	All	All year		
MTC Telephone Directory	Print	Rice and McPherson area customers	May 2018		
McPherson News	Print	McPherson Area Customers	June 28, 2017		
Marquette Tribune	Print	Marquette Area Customers	November 1, 2017		
Rice Co Plains and Progress	Print	Rice County, KS	January 2017		
Facebook	Internet	All .	All year		
Twitter	Internet	All	All year		
Website	Internet	All	All year		
			ne-projection of the control of the		

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.

LR Communications, Inc. utilizes the same plans presented with our CETC application which mirrors the offerings currently in place. These offerings are comparable to the incumbent.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly)

- 1. My title is <u>President and General Manager</u> of <u>LR Communications</u>, <u>Inc. dba</u> <u>Mutual Telecommunications</u>. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u> to the statements made in this certification.
- 2. By this affidavit, I certify that <u>LR Communications</u>, <u>Inc. dba Mutual Telecommunications</u> offers a local usage plan comparable to that of the incumbent.

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 6/22//8 (date).

Signature

John Tietjens

Printed/Typed Name