

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of an Investigation to Address) Docket No. 16-GIMT-511-GIT
CenturyLink's CAF II and KUSF Support)

NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION
(REDACTED)

The Staff of the Kansas Corporation Commission (Staff and Commission, respectively) hereby submits a Report and Recommendation (R&R) regarding a true-up of CenturyLink's¹ annual Kansas Universal Service Support (KUSF) support for March 2017 through February 2018, also referred to as KUSF Fiscal Year 21. Staff recommends the Commission issue an order:

- (1) Adopting CenturyLink's proposed \$38,213 true-up to reflect the actual Connect America Fund Phase II (CAF II) support received for enabled locations;
- (2) Adopting Staff's adjustments correcting household locations for KUSF support calculation purposes;
- (3) Finding that CenturyLink qualifies to receive, for KUSF Fiscal Year 21, \$10,014,813 of annual KUSF support (\$834,568 per month) – an annual increase of \$76,132 (\$6,344 per month);
- (4) Authorize recovery of the \$76,132 annual increase through a \$19,033 increase in CenturyLink's monthly KUSF support for the four months of November 2017 through February 2018; and
- (5) Direct CenturyLink to file an update of its CAF II support and KUSF support calculations for the March 2018 through February 2019 KUSF Fiscal Year (Year 22),

¹The United Telephone Company of Kansas d/b/a CenturyLink, United Telephone Company of Eastern Kansas d/b/a CenturyLink, United Telephone Company of Southcentral Kansas d/b/a CenturyLink, and Embark Missouri, Inc. d/b/a CenturyLink (collectively, "CenturyLink").

based on its September 30, 2017 lines in service, in this Docket on or before May 31, 2018. The May 2018 compliance filing should include: (a) the adjusted household locations, as applicable, proposed by Staff in its R&R; (b) the household locations to which CenturyLink enabled broadband service in 2015 through December 2017; and (c) a listing, separately by wire center and zone, identifying each household location in an exchange in which CenturyLink enabled broadband service during 2017. Each household location should be reported based on CenturyLink's wire center and the zone boundaries adopted by the Commission for KUSF support purposes.

WHEREFORE, Staff respectfully requests that the Commission issue an order adopting its recommendations.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael Neeley", is written over a horizontal line.

Michael Neeley, S. Ct. #25027
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STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

VERIFICATION

Michael Neeley, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Notice of Filing of Staff's Report and Recommendation (Redacted)* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Michael Neeley # 25027
Kansas Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 6th day of December, 2017.



Notary Public

My Appointment Expires: August 17, 2019

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Chairman Pat Apple
Commissioner Shari Feist Albrecht
Commissioner Jay Scott Emler

FROM: Sandy Reams, Assistant Chief of Telecommunications
Christine Aarnes, Chief of Telecommunications
Jeff McClanahan, Utilities Division Director

DATE: November 30, 2017

SUBJECT: Docket Number: 16-GIMT-511-GIT
In the Matter of an Investigation to Address CenturyLink's CAF II and KUSF Support.

EXECUTIVE SUMMARY:

On May 1, 2017, CenturyLink filed its Updated Compliance Filing (May 2017 Compliance Filing) to report a true-up in its Connect America Fund, Phase II (CAF II) support based on service locations (household locations) to which it enabled broadband services during 2016.¹ The CAF II support true-up is \$38,313² less than the CAF II support included in the calculation of CenturyLink's annual Kansas Universal Service Fund (KUSF) support for the March 2017 through February 2018 Fiscal Year (Year 21) and, therefore, CenturyLink stated it qualifies to receive an equal amount of additional KUSF support for Year 21.

Staff's review of CenturyLink's May 2017 Compliance Filing supports a \$76,132 increase in the Company's Year 21 KUSF support. Staff's recommended increase is based on: (1) the \$38,313 reduction of CAF II support and corresponding increase in the Company's KUSF support, as filed by CenturyLink; and (2) a \$37,819 increase in CenturyLink's Year 21 cost-based KUSF support as a result of correcting numerous household locations that CenturyLink incorrectly reported in a wire center and/or zone for KUSF support calculation purposes. Staff's calculations are contained in confidential Attachment I and CenturyLink's responses to Data Requests (DRs) supporting Staff's adjustment to the numerous household locations are contained in confidential Attachment II. Based on the CAF II support true-up, the household location adjustments, and the corresponding impact on

¹ CenturyLink's May 2017 Compliance Filing reflects all household locations to which broadband was enabled in 2015 or 2016 as enabled in 2016. CenturyLink response to Staff DR 18 (Attachment II).

² May 2017 Compliance Filing, Attachment B.

the calculation of CenturyLink's KUSF support, Staff recommends the Commission issue an Order to:

- 1) adopt CenturyLink's proposed \$38,313 CAF II support true-up to reflect the actual support received for enabled locations;
- 2) adopt Staff's adjustments correcting household locations for KUSF support calculation purposes;
- 3) find that CenturyLink qualifies to receive, for Year 21, \$10,014,812 of annual KUSF support (\$834,568 per month) - an annual increase of \$76,132 (\$6,344 per month);³
- 4) authorize recovery of the \$76,132 annual increase through a \$19,033⁴ increase in the Company's monthly KUSF support for the four months of November 2017⁵ through February 2018. This will result in CenturyLink receiving \$853,601 of KUSF support in each of these four months; and
- 5) direct CenturyLink to file an update to its CAF II support and KUSF support calculations for the March 2018 through February 2019 KUSF Fiscal Year (Year 22), based on its September 30, 2017 lines in service, in this Docket on or before May 31, 2018. The May 2018 Compliance Filing should include: (a) the adjusted household locations, as applicable, proposed by Staff in this Report; (b) the household locations to which the Company enabled broadband service in 2015 through December 2017; and (c) a listing, separately by wire center and zone, identifying each household location in an exchange in which the Company enabled broadband service during 2017. Each household location should be reported based on the Company's wire center and the zone boundaries adopted by the Commission for KUSF support purposes.⁶

BACKGROUND:

K.S.A. 66-2008(c) sets forth the methodology used to calculate CenturyLink's annual KUSF support. Specifically, K.S.A. 66-2008(c)(1) caps CenturyLink's annual KUSF support at \$11.4 million; K.S.A. 66-2008(c)(2) prevents CenturyLink from receiving KUSF support for price deregulated exchanges meeting certain requirements;⁷ and K.S.A. 66-2008(c)(3) requires CenturyLink's monthly per-line high-cost KUSF support to be based on the high-cost model adopted by the Commission.⁸ K.S.A. 66-

³ Docket No. 17-GIMT-008-GIT (Docket 008), Jan. 19, 2017 Order Adopting KUSF Assessment and Affordable Local Service Rates (Jan. 2017 Order); Dec. 15, 2016 Direct Testimony of Sandy Reams on Behalf of the Kansas Corporation Commission Staff, pp. 11 – 12 (Reams' Direct).

⁴ See Attachment I for detailed calculations. Total \$76,131 annual increase/12 = \$6,344 monthly increase. To allow recovery over the four months, the monthly increase is \$19,033 (\$6,344 x 3 or \$76,131/4).

⁵ The due date for the November 2017 data is December 15, 2017. Payment for the November 2017 calendar month is due to the Company no later than January 1, 2018.

⁶ Docket No. 00-GIMT-236-GIT (Docket 236), Feb. 14, 2000 Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions, in which the Commission adopted the Inside Base Rate and Outside Base Rate boundaries for the KUSF zone 1/zone 2 delineation points for The United of Kansas and The United Southeast n/k/a Embarq Missouri companies and the city limits as the zone 1/zone 2 KUSF delineation points for The United of Eastern Kansas and United of South Central Kansas companies (Feb. 2000 Order).

⁷ The Company has not requested or received approval for price deregulation in any exchange, rendering K.S.A. 66-2008(c)(2) moot at this time.

⁸ Docket No. 99-GIMT-326-GIT, Dec. 29, 1999 Order No. 10: Order Adopting a Forward-Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC's Proxy Cost Model, dated Sept. 30, 1999, and Order No. 16: Order Determining the Kansas-Specific Inputs to the FCC Cost Proxy Model to Establish a Cost-Based Kansas Universal Service Fund.

2008(c)(3) also requires that the calculated annual KUSF support be reduced by the CAF II support received, “for the same household, if feasible, or for the same census block.”

In August 2015, CenturyLink accepted \$16.5 million of annual CAF II support⁹ to provide voice and broadband service to approximately 29,000 CAF II support eligible locations in Kansas. This means the Company receives, on average, \$47.31 in CAF II support each month (\$567.72 annually) for each household location to which it will enable broadband service. Pursuant to K.S.A. 66-2008(c)(3), the CAF II support received, for each household location that also receives KUSF support, must be used to reduce the amount of annual KUSF support received by CenturyLink.

On May 24, 2016, the Commission opened this Docket to address CenturyLink’s receipt of CAF II support.¹⁰ In an October 11, 2016 Order (October 2016 Order), the Commission adopted the CAF II support model, filed by CenturyLink in August 2016, and a process to true-up the amount of KUSF support paid to CenturyLink based on actual household locations to which the Company enables broadband service. The Commission, therefore, directed CenturyLink to: (1) file an update to the CAF II support model to include household locations to which the Company enabled broadband service as of December 31, 2016, and the household locations to which the Company intended to enable broadband service during 2017; (2) provide the amount of the CAF II support offset to apply in the calculation of the Company’s KUSF support calculations and the impact on the Company’s annual KUSF support; (3) provide a listing of the service address locations, by wire center and KUSF support zone, for each wire center in which broadband service was enabled during 2016; and (4) submit the directed information in this Docket by May 1, 2017. The Commission also directed Staff to map the location of the service addresses in the wire centers in which CenturyLink enabled broadband service to ensure each service address location was correctly reported for KUSF support purposes.

CenturyLink filed the required information on May 1, 2017, reflecting that the Company enabled broadband service to 461 Kansas household locations¹¹ in the following twelve (12) exchanges:¹² Alma, Blue Mound, Edgerton, Fredonia, Gardner, Garnett, Morrill, Overbrook, Perry, Pomona, Rossville, and St. Mary’s.¹³ Of the total enabled household locations, 171 received both CAF II and KUSF support in KUSF Year 21.

CenturyLink’s CAF II support true-up, therefore, recognizes the Company enabled broadband service to fewer household locations that receive both CAF II and KUSF support than the number (189) it estimated it would. Thus, the May 2017 Compliance Filing recognizes that the estimated \$3,244,823 CAF II support offset included in the calculation of its Year 21 KUSF support should be reduced to \$3,217,510, a reduction of \$38,313. As a result of this true-up, CenturyLink stated it qualifies to receive an increase of \$38,313 in its annual KUSF Year 21 support.

⁹ Federal Communications Commission, CAF II - CAM4.3 - CenturyLink by County, August 2015, https://apps.fcc.gov/edocs_public/attachmatch/DOC-335269A2.pdf, last viewed Feb. 22, 2016.

¹⁰ May 24, 2016 Order Opening Docket to Address CenturyLink’s CAF II and KUSF Support.

¹¹ CenturyLink response to Staff DR 18 (Attachment II).

¹² May 2017 Compliance Filing, Attachment B.

¹³ Id., Attachment C.

ANALYSIS:

Staff reviewed CenturyLink's May 2017 Compliance Filing, issued numerous DRs to the Company, and worked with the Commission's Geographic Information Systems (GIS) division to map each household location in each exchange CenturyLink enabled broadband service during 2016. Staff's review supports a \$76,132 increase to CenturyLink's KUSF Year 21 support, which includes the \$38,313 true-up for CAF II support and \$37,819 for Staff's corrections to CenturyLink's reported household locations.

CenturyLink receives CAF II support for each eligible household location prior to deploying broadband service, therefore, to approximate the number of household locations to which the Company will enable broadband service, the CAF II support model includes an adjustment location factor. The Commission previously determined that once broadband service is deployed in a census block, the adjustment location factor will no longer be applied in that census block.¹⁴ Thus, Staff reviewed the CAF II support model to confirm CenturyLink did not apply the adjustment location factor in the census blocks in which it has enabled broadband service and confirms that it did not.

Staff also reviewed the data to verify that CenturyLink reported each household location in the correct wire center and zone for KUSF support purposes and worked with the Commission's GIS division to map each household location in the 12 exchanges in which CenturyLink has enabled broadband service. As a result, Staff identified two hundred and fifty-five (255) household locations that CenturyLink reported in the wrong wire center and/or zone for KUSF purposes. Discussions with CenturyLink revealed the Company determined the wire center and zone location of each household for KUSF purposes based on the city limits instead of the base rate area boundaries for wire centers located in the United Telephone Company of Kansas (United) and Embarq Missouri.¹⁵ Staff, therefore, adjusted the location of these households to the correct wire center and zone for KUSF support purposes. The impact of Staff's adjustments to the calculation of CenturyLink's annual KUSF support are shown in Table 1, below:

Table 1

Description	Year 21 Support - Current	Year 21 Support - Adjusted	Year 21 True-up
Gross Cost-Based KUSF Support	\$ 12,307,878	\$ 12,345,697	\$ 37,819
Less: CAF II Support Offset	3,255,823	3,217,510	(38,313)
Net Cost Based KUSF Support	\$ 9,052,055	\$ 9,128,187	\$ 76,132
Plus: Access Revenue Recovery	902,745	902,745	-
Less: Year 20 CAF II/KUSF Support True-Up	(16,119)	(16,119)	-
KUSF Support Payable to Company – Annual	\$ 9,938,681	\$10,014,813	\$ 76,131
KUSF Support - Monthly	\$ 828,223	\$ 834,568	\$ 6,344
Annual True-up/Month (Nov.–Feb.)		19,033	
Total Monthly KUSF Support		\$ 853,601	

¹⁴ October 2016 Order.

¹⁵ Docket 236, Feb. 2000 Order.

As illustrated in Table 1, effective March 1, 2017, CenturyLink has received \$828,223 of monthly KUSF support, based on the Company being qualified to receive \$9,938,681¹⁶ of annual KUSF support. However, the \$38,313 true-up reduction for CAF II support means the Company qualifies to receive an equal increase in its annual KUSF support. Additionally, Staff's adjustments for household locations results in a \$37,819 increase in the gross KUSF support CenturyLink qualifies to receive. Thus, CenturyLink qualifies to receive \$10,014,813 of annual KUSF support (\$834,568 monthly) for Year 21, meaning the Company qualifies to receive an additional \$76,131 of KUSF support for Year 21. Staff recommends this amount be paid to the Company via a \$19,033 increase in the Company's monthly KUSF support for the four remaining months of Year 21, November 2017 through February 2018.

CenturyLink's KUSF support for the new KUSF Fiscal Year of March 2018, through February 2019 (KUSF Year 22) will be determined in Docket No. 18-GIMT-084-GIT.¹⁷ A true-up to the Year 22 calculations will need to occur to reflect the CAF II and KUSF support CenturyLink receives for the year based on the household locations to which it enabled broadband service during 2017. To ensure each enabled household location is located in the correct wire center and/or zone for KUSF support purposes, the Company will need to provide household location information, by exchange and zone, for each census block in which it enables broadband service during 2017.

RECOMMENDATION:

Based on Staff's analysis, Staff recommends the Commission issue an Order to:

- (1) adopt CenturyLink's proposed \$38,313 true-up to reflect the actual CAF II support received for enabled locations;
- (2) adopt Staff's adjustments correcting household locations for KUSF support calculation purposes;
- (3) find that CenturyLink qualifies to receive, for Year 21, \$10,014,813 of annual KUSF support (\$834,568 per month) - an annual increase of \$76,132 (\$6,344 per month);¹⁸
- (4) authorize recovery of the \$76,132 annual increase through a \$19,033¹⁹ increase in the Company's monthly KUSF support for the four months of November 2017²⁰ through February 2018. This will result in CenturyLink receiving \$853,601 of KUSF support in each of these four months; and
- (5) direct CenturyLink to file an update to its CAF II support and KUSF support calculations for the March 2018 through February 2019 KUSF Fiscal Year (Year 22), based on its September 30, 2017 lines in service, in this Docket on or before May 31, 2018. The May 2018 compliance filing should include: (a) the adjusted household locations, as applicable, proposed by Staff in

¹⁶ Docket 008, Jan. 2017 Order, Reams Direct.

¹⁷ Docket No. 18-GIMT-084-GIT, Oct. 18, 2018, CenturyLink Data Submission.

¹⁸ Docket No. 17-GIMT-008-GIT (Docket 008), Jan. 19, 2017 Order Adopting KUSF Assessment and Affordable Local Service Rates (Jan. 2017 Order); Dec. 15, 2016 Direct Testimony of Sandy Reams on Behalf of the Kansas Corporation Commission Staff, pp. 11 – 12 (Reams' Direct).

¹⁹ See Attachment I for detailed calculations. Total \$76,131 annual increase/12 = \$6,344 monthly increase. To allow recovery over the four months, the monthly increase is \$19,033 (\$6,344 x 3 or \$76,131/4).

²⁰ The due date for the November 2017 data is December 15, 2017. Payment for the November 2017 calendar month is due to the Company no later than January 1, 2018.

this Report; (b) the household locations to which the Company enabled broadband service in 2015 through December 2017; and (c) a listing, separately by wire center and zone, identifying each household location in an exchange in which the Company enabled broadband service during 2017. Each household location should be reported based on the Company's wire center and the zone boundaries adopted by the Commission for KUSF support purposes.

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

In the Matter of An Investigation to Address)
CenturyLink's CAF II and KUSF Support.) Docket No. 16-GIMT-511-GIT

REDACTED

Attachment I

to Staff's November 2017

Report and Recommendation

Contains Confidential

Company Lines

by

KUSF Wire Center and Exchange

Summary of
CenturyLink KUSF 21
(3/1/2017 - 2/28/2018)
KUSF/CAF II Support True-Up

Docket No. 16-GIMT-511-GIT
Attachment 1

<u>Description</u>	<u>Amount</u>
Year 21 Gross Cost-Based KUSF Per Issue No. 35	\$ 12,307,877
Year 21 Gross Cost-Based Per Issue No. 36	\$ 12,345,696
Total True-Up	\$ 37,819
Year 21 CAF II Offset Per Issue No. 35	\$ (3,255,823)
Year 21 CAF II Offset Per Issue No. 36	\$ (3,217,510)
Total True-Up	\$ 38,313
Year 21 Gross Cost-Based KUSF Support True-Up	\$ 37,819
Year 21 CAF II Support True-Up	38,313
Total True-Up	\$ 76,132
Monthly True-Up	\$ 6,344
Total True-Up	\$ 76,132
Recovery Period (months)	4
Monthly Adjustment	\$ 19,033
Adjusted Monthly KUSF Support, effective 3/1/2017	\$ 834,568
4-Month Recovery Period Adjustment	19,033
Adjusted KUSF Support, effective 11/1/2017	\$ 853,601

United Telephone Companies of Kansas d/b/a CenturyLink KS00001411
KUSF Support Calculation Worksheet
Effective As Of 3/1/2017 Data Month
Fiscal Year 2017/2018

Issue No. 36

<u>Description</u>		<u>Annual</u>	<u>Monthly</u>	
<u>United of Eastern/South Central SAC 411317</u>				
Gross KUSF	\$ 9,359,038			(1)
Less: Adjusted CAF II Offset Year 21	(2,288,093)			(2)
Net KUSF: United of Eastern/South Central SAC		\$ 7,070,945	\$ 589,245	
<u>United of Kansas SAC 411842</u>				
Gross KUSF	\$ 2,825,217			(1)
Less: Adjusted CAF II Offset Year 21	(904,312)			(2)
Net KUSF: United of Kansas SAC		1,920,905	160,075	
<u>Embarq MO SAC 411957</u>				
Gross KUSF	\$ 161,441			(1)
Less: CAF II Offset Year 21	(25,105)			(2)
Net KUSF: United of MO SAC		136,336	11,361	
Net Cost-Based KUSF Year 21 Support Payable to Company		\$ 9,128,186	\$ 760,682	(3)
Plus: Access revenue Recovery-Docket No. 08-1023		902,745	75,229	(4)
Less: KUSF Year 20 Support Correction		(16,119)	(1,343)	(5)
Adjusted KUSF Support		\$ 10,014,813	\$ 834,568	
Plus: Year 21 Monthly True-Up			19,033	(6)
Total Adjusted KUSF Support Payable to Company			\$ 853,601	(7)
Assessment Rate	7.25%			(8)
Lifeline	\$ 7.77			

Per HB 2201, KUSF Support Capped at:	Support
KUSF Support, as of 2/28/2013	\$ 13,279,541
	90%
	\$ 11,951,587
Or, Lesser of, or Cap	\$ 11,400,000

Notes:

- 1) Gross KUSF support for each study area is based on 9/30/2016 lines and Docket No. 99-GIMT-326-GIT high-cost model, Order Nos. 10 and 16.
- 2) High Cost Model reflects the total company unseparated cost-based support. CAF II support received for the same household is an offset to the gross KUSF support. (K.S.A. 66-2008(c) and Docket No. 16-GIMT-511-GIT). Subject to CAF II support true-up for eligible lines/locations for January 2016 - February 2018.
- 3) Net cost-based KUSF support payable to Company for all study areas.
- 4) Revenue-Neutral KUSF Support for Intrastate access reductions, Docket No. 08-GIMT-1023-GIT.
- 5) Adjustment for 9/30/2015 KUSF supported line locations (Docket Nos. 16-GIMT-511-GIT, 17-GIMT-008-GIT).
- 6) Adjustment for 9/30/2016 KUSF supported line locations.
- 7) Total adjusted KUSF Support Payable to Company.
- 8) Docket No. 17-GIMT-008-GIT, Jan. 19, 2017 Order.

United Telephone Companies of Kansas d/b/a CenturyLink KS00001411
KUSF Support Calculation Worksheet
Effective As Of 3/1/2017 Data Month
Fiscal Year 2017/2018
Reflects Annual True-Up, effective Nov. 2017

<u>Description</u>		<u>Annual</u>	<u>Issue No. 35 Revised Monthly</u>	
<u>United of Eastern/South Central SAC 411317 (see pp. 2 - 3)</u>				
Gross KUSF	\$ 9,328,658			(1)
Less: Estimated CAF II Offset Year 20 (see p. 5 - 6):	<u>(2,312,162)</u>			(2)
Net KUSF: United of Eastern/South Central SAC		\$ 7,016,496	\$ 584,708	
<u>United of Kansas SAC 411842 (from p. 3)</u>				
Gross KUSF	\$ 2,817,778			(1)
Less: Estimated CAF II Offset Year 20 (see p. 5 - 6):	<u>(918,556)</u>			(2)
Net KUSF: United of Kansas SAC		1,899,223	158,269	
<u>Embarq MO SAC 411957 (see p. 3)</u>				
Gross KUSF	\$ 161,441			(1)
Less: Estimated CAF II Offset Year 20 (see p. 5 - 6):	<u>(25,105)</u>			(2)
Net KUSF: United of MO SAC		136,337	11,361	
Net Cost-Based KUSF Year 21 Support Payable to Company		\$ 9,052,056	\$ 754,338	(3)
Plus: Access revenue Recovery-Docket No. 08-1023 (see p. 4)		902,745	75,229	(4)
Less: KUSF Year 20 Support Correction		<u>(16,119)</u>	<u>(1,343)</u>	(5)
Total Preliminary Calculated KUSF Support		\$ 9,938,681	\$ 828,223	(6)
<i>KUSF Year 21 True-Up</i>		<u>76,131</u>	<u>6,344</u>	
Total Adjusted KUSF Support Payable to Company		<u>\$ 10,014,813</u>	<u>\$ 834,568</u>	
Assessment Rate	7.25%			(7)
Lifeline	\$ 7.77			

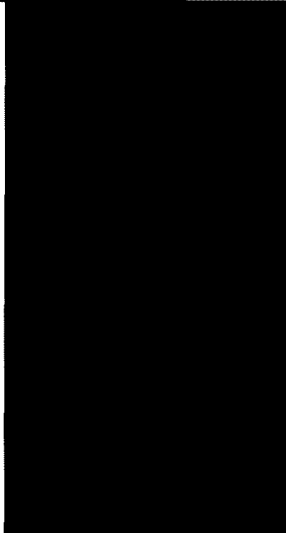
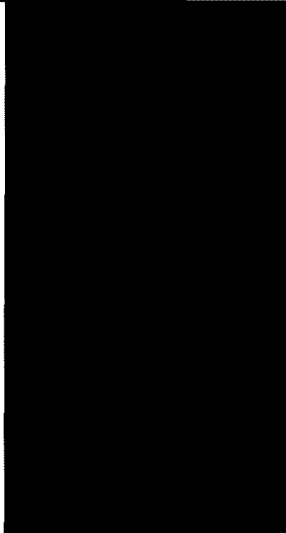






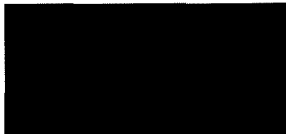
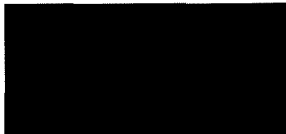


Per HB 2201, KUSF Support Capped at:	Support
KUSF Support, as of 2/28/2013	\$ 13,279,541
	90%
	\$ 11,951,587
Or, Lesser of, or Cap	\$ 11,400,000

Notes:

- Gross KUSF support for each study area is based on 9/30/2016 lines and Docket No. 99-GIMT-326-GIT high-cost model, Order Nos. 10 and 16.
- High Cost Model reflects the total company unseparated cost-based support. CAF II support received for the same household is applied as an offset to the gross KUSF support. (K.S.A. 66-2008(c) and Docket No. 16-GIMT-511-GIT). Subject to CAF II support true-up for eligible lines/locations for January 2016 - February 2018.
- Net cost-based KUSF support payable to Company for all study areas.
- Revenue-Neutral KUSF Support for Intrastate access reductions, Docket No. 08-GIMT-1023-GIT.
- Adjustment to correct for KUSF supported line locations.
- Total KUSF Support Payable to Company.
- January 19, 2017 Order, Docket No. 17-GIMT-008-GIT.

Summary of KUSF Line
Service Address Location
Adjustments

Docket No. 16-GIMT-511-GIT
Attachment I

Wire Center	Zone 1	Zone 2	DR reference
Alma			39
Blue Mound			39
Edgerton			39
Gardner			39
Morrill			39
Hiawatha			39
Rossville			39
Delia			39
Silver Lake			39
Perry			39
Oskaloosa			39
Overbrook			39
Pomona			39
Garnett			39
St Marys			39
Emmett			39
Total	(32)	32	
Edgerton			40
Gardner			40
Spring Hill			40
Fredonia			40
LaFontaine			40
Pomona			40
Overbrook			40
Centropolis			40
Garnett			40
Total	7	(8)	
Garnett			41
St. Mary's			41
Spring Hill			41
Fredonia			41
Total	4	(6)	
Alma			42
Fredonia			42
Total	(23)	23	
Fredonia			43
LaFontaine			43
Toronto			43
Benedict			43
Total	(3)	3	
Fredonia			44
LaFontaine			44
Fall River			44
Coyville			44
Altoona			44
Total	24	(24)	

REDACTED

11/27/2017

Company: CenturyLink of Kansas

Wire Center Study Area		As of September 30, 2016						KUSF / CAF2 Overlap						Zone1 KUSF Reduction Zone 2 KUSF Reduction Total KUSF Reduction		
		ZONE 1			ZONE 2			Zone 1			Zone 2					
		Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap			
Alta Vista	Eastern	\$	18.19		\$	100.01										
Altoona	Eastern	\$	21.80		\$	91.96										
Belle Plaine	Eastern	\$	-		\$	31.13										
Benedict	Eastern	\$	-		\$	117.03										
Blue Mound (REV)	Eastern	\$	40.47		\$	114.80										
Bucyrus	Eastern	\$	-		\$	39.07										
Buffalo	Eastern	\$	-		\$	70.97										
Centropolis	Eastern	\$	-		\$	69.73										
Circleville	Eastern	\$	34.46		\$	90.67										
Conway	Eastern	\$	-		\$	98.49										
Coyville	Eastern	\$	-		\$	88.71										
Delia (REV)	Eastern	\$	-		\$	84.53										
Denison	Eastern	\$	29.99		\$	84.00										
Durham	Eastern	\$	-		\$	103.19										
Easton	Eastern	\$	7.74		\$	43.71										
Edgerton (REV)	Eastern	\$	-		\$	21.98										
Effingham	Eastern	\$	4.01		\$	59.56										
Emmett (REV)	Eastern	\$	39.17		\$	93.49										
Fall River (REV)	Eastern	\$	-		\$	68.10										
Fontana	Eastern	\$	-		\$	47.58										
Gardner (REV)	Eastern	\$	-		\$	3.08										
Greeley	Eastern	\$	8.04		\$	66.26										
Gridley	Eastern	\$	14.80		\$	109.86										
Harveysville	Eastern	\$	24.75		\$	82.47										
Hesston	Eastern	\$	-		\$	17.30										
Hoyt	Eastern	\$	5.81		\$	45.96										
Inman	Eastern	\$	-		\$	42.76										
Lafontaine	Eastern	\$	-		\$	125.45										
Lancaster	Eastern	\$	4.09		\$	51.05										
Lane	Eastern	\$	-		\$	32.96										
Lobo	Eastern	\$	2.99		\$	77.37										
Lehigh	Eastern	\$	41.68		\$	117.10										
Le Roy	Eastern	\$	17.48		\$	111.73										
Linwood	Eastern	\$	8.12		\$	29.30										
Mapleton	Eastern	\$	-		\$	93.54										
Mayetta	Eastern	\$	16.87		\$	51.20										
Mc Louth	Eastern	\$	3.77		\$	50.21										
Meriden	Eastern	\$	1.17		\$	28.18										
Michigan Valley	Eastern	\$	-		\$	86.39										
Mound City	Eastern	\$	1.71		\$	53.47										
Neosho Falls	Eastern	\$	-		\$	93.55										
Nortonville	Eastern	\$	5.83		\$	57.07										

Company: CenturyLink of Kansas

Wire Center Study Area		As of September 30, 2016						KUSF / CAF2 Overlap						Zone1 KUSF Reduction	Zone 2 KUSF Reduction	Total KUSF Reduction								
		ZONE 1			ZONE 2			Zone 1			Zone 2													
		Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap											
Osage City	Eastern	\$	-			\$	37.89																	
Overbrook (REV)	Eastern	\$	1.30			\$	54.24																	
Oxford	Eastern	\$	-			\$	49.26																	
Ozawie	Eastern	\$	7.56			\$	38.45																	
Parker	Eastern	\$	12.16			\$	67.36																	
Perry (REV)	Eastern	\$	0.15			\$	36.68																	
Piqua	Eastern	\$	-			\$	117.23																	
Princeton	Eastern	\$	8.28			\$	67.05																	
Quincy	Eastern	\$	-			\$	243.23																	
Richmond	Eastern	\$	9.84			\$	69.69																	
Rossville (REV)	Eastern	\$	-			\$	45.52																	
Silver Lake (REV)	Eastern	\$	-			\$	27.20																	
Spring Hill (REV)	Eastern	\$	0.41			\$	21.46																	
Saint Marys (REV)	Eastern	\$	-			\$	15.95																	
Thayer	Eastern	\$	11.90			\$	75.96																	
Toronto	Eastern	\$	14.09			\$	80.33																	
Walton	Eastern	\$	12.47			\$	70.57																	
Wellsville	Eastern	\$	-			\$	41.21																	
Winchester	Eastern	\$	1.11			\$	60.84																	
Windom	Eastern	\$	-			\$	60.58																	
Abbyville	S. Central	\$	-			\$	59.22																	
Alden	S. Central	\$	27.44			\$	45.06																	
Arlington	S. Central	\$	10.55			\$	71.51																	
Belpre	S. Central	\$	-			\$	72.04																	
Claffin	S. Central	\$	6.34			\$	75.04																	
Cunningham	S. Central	\$	15.68			\$	109.55																	
Hoisington	S. Central	\$	-			\$	49.76																	
Hudson	S. Central	\$	-			\$	57.73																	
Langdon	S. Central	\$	-			\$	67.61																	
Macksville	S. Central	\$	-			\$	43.76																	
Murdock	S. Central	\$	-			\$	92.68																	
Partridge	S. Central	\$	13.29			\$	64.25																	
Preston	S. Central	\$	-			\$	87.12																	
Pretty Prairie	S. Central	\$	9.13			\$	70.83																	
Saint John	S. Central	\$	0.42			\$	73.11																	
Sterling	S. Central	\$	-			\$	33.26																	
Sylvia	S. Central	\$	-			\$	48.80																	
Subtotal			\$	524,039			\$	8,834,999		\$	303,569	\$	503,980		\$	9,036,327	\$	6,566,965	\$	20,059	\$	2,268,034	\$	2,288,093

Company: CenturyLink of Kansas

		As of September 30, 2016						KUSF / CAF2 Overlap								
		ZONE 1			ZONE 2			Zone 1			Zone 2					
Wire Center	Study Area	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap	Zone1 KUSF Reduction	Zone 2 KUSF Reduction	Total KUSF Reduction
Riverton	South East		\$ 5.38			\$ 36.70										
Scammon	South East		\$ 2.06			\$ 28.18										
	Subtotal			\$ 2,913			\$ 158,528		\$ 2,899	\$ 2,901		\$ 91,021	\$ 133,435	\$ 11	\$ 25,093	\$ 25,105
Alma (REV)	United		\$ -			\$ 63.41	\$ -									
Altamont	United		\$ 0.82			\$ 57.60	\$ -									
Baldwin	United		\$ -			\$ 20.81	\$ -									
Buhler	United		\$ -			\$ 26.31	\$ -									
Burlingame	United		\$ -			\$ 27.66	\$ -									
Burlington	United		\$ -			\$ 32.11	\$ -									
Burton	United		\$ 9.41			\$ 82.62	\$ -									
Ellinwood	United		\$ -			\$ 37.54	\$ -									
Eskridge	United		\$ -			\$ 95.25	\$ -									
Fredonia	United		\$ -			\$ 4.78	\$ -									
Garrett (REV)	United		\$ -			\$ 21.33	\$ -									
Haven	United		\$ -			\$ 9.16	\$ -									
Highland	United		\$ -			\$ 21.49	\$ -									
Hillsboro	United		\$ -			\$ 13.26	\$ -									
Kincaid	United		\$ -			\$ 54.52	\$ -									
Lyndon	United		\$ -			\$ 28.81	\$ -									
Melvorn	United		\$ -			\$ 60.74	\$ -									
Moran	United		\$ 7.46			\$ 72.61	\$ -									
Morrill (REV)	United		\$ -			\$ 36.76	\$ -									
Mound Valley	United		\$ 15.01			\$ 78.78	\$ -									
Oskaloosa (REV)	United		\$ -			\$ 26.07	\$ -									
Oswego	United		\$ -			\$ 24.81	\$ -									
Poncha (REV)	United		\$ -			\$ 28.28	\$ -									
Powhattan	United		\$ -			\$ 51.81	\$ -									
Quenemo	United		\$ -			\$ 111.32	\$ -									
Troy	United		\$ -			\$ 45.65	\$ -									
Valley Falls	United		\$ -			\$ 26.42	\$ -									
Wathena	United		\$ 2.68			\$ 45.16	\$ -									
Waverly	United		\$ 1.12			\$ 84.23	\$ -									
Westphalia	United		\$ -			\$ 75.84	\$ -									
White Cloud	United		\$ 14.45			\$ 69.22	\$ -									
	Subtotal			\$ 51,239		\$ 2,773,978		\$ 271,618	\$ 44,659		\$ 4,908,081	\$ 1,876,246	\$ 6,580	\$ 897,732	\$ 904,312	
Subtotal - All Companies			\$ 578,191			\$ 11,767,505		578,086	551,540		14,035,429	8,576,646	\$ 26,650	\$ 3,190,859	\$ 3,217,510	
Total Company						\$ 12,345,696					\$ 14,613,515	\$ 9,128,186				

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

In the Matter of An Investigation to Address)
CenturyLink's CAF II and KUSF Support.) Docket No. 16-GIMT-511-GIT

REDACTED

Attachment II

to Staff's November 2017

Report and Recommendation

CenturyLink's Responses to

Staff Data Requests Nos. 39-44

United Telephone Company of Kansas dba CenturyLink
Docket No. 16-GIMT-511-GIT

Staff Data Request No: #17, #18 & #19
Request Date: July 19, 2017
Due Date: July 28, 2017

Re: Geocoding, longitude and latitude

Staff Request #17

Please refer to the Attachment to Staff DR 17 for the following:

The Commission's Information Technology (IT) Division remapped the longitude and latitudes of each provided location; however, the study area, exchange, wire center, and/or BRA zone arising from the IT Division's remapping did not arrive at the same location as that reported by CenturyLink. For each address that did not match, please confirm the address, reported location, and longitude and latitude of each, and provide corrected data as applicable. If the company agrees with Staff's results, please so indicate.

CenturyLink Response Request #17:

CenturyLink's response by location is in the attached Attachment to Staff DR 17_CTL response_07192017.xlsx.

The location specific data is only used for determining whether customer locations fall in CAFII eligible census blocks and not used for determining the overall KUSF. To determine whether customer locations fell in CAFII census blocks, CenturyLink geocoded the locations that were summed to wire center and zone for KUSF purposes. If the geocoding results in the location falling into a CAFII census block it is included in the overlap model. If the locations fall outside of a CAFII census block, they are not included in the overlap model. CenturyLink's geocoding process relied upon publically available geocoding software, Alteryx, to identify the location of the serving address and determine the census block. The Zone mapping files that staff uses was used to determine zone, and CenturyLink's wire center boundaries were used to determine serving wire center. The field CTL Geocoding Result identifies the level of accuracy:

- Well Geocoded – Exact address was found at either the Actual, Street, or Zip9 level.
- Living Unit Fallback indicates – If the address was not Well Geocoded, the address was compared to CenturyLink's Living Unit database and if an exact match was found, that location was used to determine Census Block and Zone for KUSF overlap with CAFII purposes.
- Nearest Living Unit Fallback indicates – The lat/long from geocoding was compared to CenturyLink's Living Unit database and if it fell within 2 miles, the nearest living unit was used as a surrogate of the serving location. The surrogate location was then used to determine Census Block and KUSF Zone for KUSF overlap with CAFII purposes.
- WC/Zone Fallback – If the serving location did not match to any of the criteria above, TaxID codes in CenturyLink's billing and CLLI in CenturyLink's billing data were used to identify the KUSF Zone and Wirecenter. For these locations, a CB was not assigned.

Reviewing the locations of the BANS in Staff's file, CenturyLink found that of the 71 locations, 10 are in CAFII eligible CBs. The remaining fell outside of CAFII areas and are thus not part of the overlap analysis. Of the 10 falling into CAFII areas, four are geocoded based on the Living Unit Fallback and 6 were Well Geocoded.

Staff Request #18

- a. Please explain why the May 1, 2017 CAF model was revised for 2015 enabled locations.
- b. Identify the 2015 locations that were revised, by census block, and KUSF support exchange and zone.
- c. Did CenturyLink flow through the 2015 enabled location revisions in the KUSF model?

CenturyLink Response Request #18

- a. CenturyLink's July 2017 CAFII filing with the FCC included revised 2015 data for locations enabled as part of CAFII. Because of the updated locations and filing year, all locations are included in 2016 as that is the year of the data filed and the need to be consistent with CenturyLink's FCC filing. In CenturyLink's filing with the FCC for 2015, 110 locations were deemed enabled in KS, however, this was revised to 97 in CenturyLink's filing for 2016. CenturyLink billed customers at 26 of the 97 locations. In total, CenturyLink's July 2017 FCC filing for 2016 shows 461 enabled locations in KS, which is cumulative and includes locations enabled in both 2015 and 2016. 171 of the total locations fall into areas of KS with KUSF while the remaining 290 CAFII enabled locations are in areas where CenturyLink does not receive KUSF.
- b. The revised locations by CB, CLLI, and KUSF Zone are found on "CAF2 Completed" tab of CenturyLink's model (KS CAF2_KUSF CB overlap with Sept2016 data 2015 refile and 2016 enabled locations_04212017_final.xlsx). The "CBDetail" tab in the model then pulls in these data via lookups to determine the overlapping funding by CB.
- c. Yes. To the extent that the 2015 locations are in areas eligible for KUSF, the locations flow through the KUSF model.

Staff Request #19

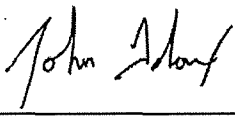
Please confirm that the wire center and zone location corrections, adopted by the Commission in its October 11, 2016 Order, for lines in service as of Sept. 30, 2015, are recognized in the CAF II and KUSF support model calculations filed by CenturyLink on May 1, 2017. If all line location corrections were not reflected in the May 1, 2017 support models, identify the locations, by wire center and KUSF support zone, that were not incorporated into the model(s) and explain why the line(s) corrections were not reflected.

CenturyLink Response Request #19

The lines in service as of September 30, 2015 are now almost two years old. Over time, new customers were added and existing customers disconnected service in the normal course of business. Since the 2015 lines were reported, CenturyLink now has reported two rounds of enabled CAFII locations to the FCC. CenturyLink also updated its geocoding application (Alteryx) since 2015. When new data are pulled for each fall filing, that data set is re-geocoded. Because the current data are based on September 2016 and more up to date geocoding procedures, CenturyLink relied on the results of the updated geocoding.

Verification of CenturyLink Response #17, #18 & #19

I have read the foregoing Information Requests and answers thereto and find answers to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose any matter subsequently discovered which affects the accuracy or completeness of the answers to these information requests.

Signed: 

Date: July 27, 2018

Kansas Corporation Commission
Information Request

Request No: **39**

Company Name UNITED TELEPHONE CO. OF KANSAS UTDT
Docket Number 16-GIMT-511-GIT
Request Date October 19, 2017
Date Information Needed October 30, 2017
RE: Location Adjustments, DRs 22 - 32

Please Provide the Following:

Please refer to the Attachment to Staff DR 39, consisting of customer line location adjustments identified in Staff DRs 22-32 and to which CenturyLink agreed to Staff's proposed adjustment. To ensure Staff has correctly identified each location adjustment, please reconfirm the Company's agreement with the adjustment. If the Company cannot confirm the agreement, please explain why not (e.g. .Company did not previously agree to adjustment, etc.).

Submitted By Sandy Reams

Submitted To John Idoux

CenturyLink Response to Request #39:

CenturyLink agrees with the Commission's GIS Division's results and Staff's recommendations for all items presented in Adjustment Summary DR 22 – 32.

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:  _____

Date: October 23, 2017

**Kansas Corporation Commission
Information Request**

Request No: **40**

Company Name UNITED TELEPHONE CO. OF KANSAS UTDT
Docket Number 16-GIMT-511-GIT
Request Date October 19, 2017
Date Information Needed October 30, 2017

RE:

Please Provide the Following:

Please refer to the Attachment to Staff DR 40, consisting of customer line location adjustments identified in Staff DRs 33-37 and to which CenturyLink agreed to Staff's proposed adjustment. To ensure Staff has correctly identified each location adjustment, please reconfirm the Company's agreement with the adjustment. If the Company cannot confirm the agreement, please explain why not (e.g. .Company did not previously agree to adjustment, etc.).

Submitted By Sandy Reams

Submitted To John Idoux

CenturyLink Response to Request #40:

CenturyLink agrees with the Commission's GIS Division's results and Staff's recommendations for all items presented in Adjustment Summary DR 33 – 37.

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:  _____

Date: October 23, 2017

Kansas Corporation Commission
Information Request

Request No: **41**

Company Name UNITED TELEPHONE CO. OF KANSAS UTDT
Docket Number 16-GIMT-511-GIT
Request Date October 24, 2017
Date Information Needed November 2, 2017

RE: Service Location Adjustments, KUSF Support

Please Provide the Following:

Please refer to the Attachment to Staff DR 41 for the following:

- A. For service address locations identified in Line Nos. 1-3, please provide the service address. If no service address is available, please indicate the Company's agreement or disagreement with Staff's proposed adjustments. If the company disagrees with Staff's proposed adjustments, please provide information supporting the wire center and zone of each line's location for KUSF purposes.
- B. For service address locations identified in Line Nos. 4-7, please confirm if the lines are located at the rest stop on I-70 west or the physical location of the service location. Please provide documentation to assist Staff in identifying the location of the service locations.
- C. For the service address locations identified in Line Nos. 8-31, please indicate CenturyLink's agreement or disagreement with Staff's proposed adjustment. If the Company disagrees, please provide documentation supporting the location of the line.

Submitted By Sandy Reams

Submitted To John Idoux

CenturyLink Response to Staff DR #41:

- A. Please see the response on the attached spreadsheet.
- B. Please see the response on the attached spreadsheet. The accounts are for the eastbound and westbound KS Highway Patrol weigh station on I-70 just northwest of McFarland, which is included in the Alma exchange.
- C. CenturyLink agrees with the Staff's recommendations for all items presented for Lines 8-31.

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: _____

Date: November 1, 2017

Kansas Corporation Commission
Information Request

Request No: 42

Company Name UNITED TELEPHONE CO. OF KANSAS UTDT
Docket Number 16-GIMT-511-GIT
Request Date October 27, 2017
Date Information Needed November 6, 2017

RE:

Please Provide the Following:

Referring to the Attachments to Staff DR 42, state CenturyLink's agreement or disagreement with Staff's proposed adjustment. If the Company disagrees, please explain why and provide additional information to assist Staff in locating the service address.

Submitted By Sandy Reams

Submitted To John Idoux

CenturyLink Response to Staff DR #42

Please see the response on the attached spreadsheet. CenturyLink agrees with the Staff Adjustment for each item listed.

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.



Signed: _____

Date: November 1, 2017

Kansas Corporation Commission
Information Request

Request No: **43**

Company Name UNITED TELEPHONE CO. OF KANSAS UTDT
Docket Number 16-GIMT-511-GIT
Request Date October 27, 2017
Date Information Needed November 6, 2017

RE:

Please Provide the Following:

Referring to the Attachments to Staff DR 43, please state whether CenturyLink agrees or disagrees with Staff's proposed adjustment. If the Company disagrees, please explain why and provide information to assist Staff with the location of the service address.

Submitted By Sandy Reams

Submitted To John Idoux
CenturyLink Response to Staff DR #43

Please see the response on the attached spreadsheet. CenturyLink agrees with the Staff Adjustment for each item listed.

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed:  _____

Date: November 1, 2017

Kansas Corporation Commission
Information Request

CONFIDENTIAL

Request No: **44**

Company Name UNITED TELEPHONE CO. OF KANSAS UTD
Docket Number 16-GIMT-511-GIT
Request Date October 27, 2017
Date Information Needed November 28, 2017

RE: DR 25, Service address locations

Please Provide the Following:

Referring to the Attachment to Staff DR 44, please indicate whether CenturyLink agrees or disagrees with Staff's mapping results of the identified service address location and proposed adjustment. If the Company disagrees, please explain why and provide supporting documentation.

Submitted By Sandy Reams

Submitted To John Idoux

CenturyLink Response to Staff DR #44

Please see the response on the attached spreadsheet. CenturyLink agrees with the Staff Adjustment for each item listed.

If for some reason, the above information cannot be provided by the date requested, please provide a written explanation of those reasons.

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: _____

Date: 11/28/2017

CERTIFICATE OF SERVICE

16-GIMT-511-GIT

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served by electronic service on this 6th day of December, 2017, to the following:

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Pamela Griffeth
Administrative Specialist

* Denotes those receiving the Confidential version