

COLLEEN R. JAMISON  
JAMISON LAW, LLC

June 25, 2024

Lynn M. Retz, Secretary  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604

RE: S&A Telephone Co., LLC  
Docket No. 24-GIMT-612-GIT  
254(e) certifications

Dear Ms. Retz:

On behalf of S&A Telephone Co., LLC, attached please find for filing in Docket No. 24-GIMT-612-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 28, 2024 (Attachments 1, 2a, 4, and 5). Because S&A has elected ACAM support, and in order to assist Staff in its evaluation, we have included both an unallocated Attachment 2a and an Attachment 2a allocating S&A's ACAM support between the interstate and intrastate jurisdictions.

In this filing, the entirety of Attachments 2a and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Cordially yours,

*Colleen R. Jamison*

Colleen R. Jamison  
JAMISON LAW, LLC

Encl.

cc: Derek O'Borsky  
Jackie McCarthy

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

In the Matter of Certification of Compliance       )  
with Section 254(e) of the Federal                )  
Telecommunications Act of 1996 and                )       Docket No. 24-GIMT-612-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 Federal and Kansas Support Received)**

1. My title is Vice President-Controller of S&A Telephone Company  
(Company/Cooperative). In this capacity, I am in a position of authority to direct how federal high-cost  
Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety  
Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF  
II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband  
Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal  
Service Fund (KUSF) support received will be used and by this certification I am binding S&A Telephone  
Company (Company/Cooperative) to the statements made in this certification.

2. S&A Telephone Company (Company/Cooperative) was named as an Eligible  
Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support  
purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997 and KUSF support purposes  
in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997.

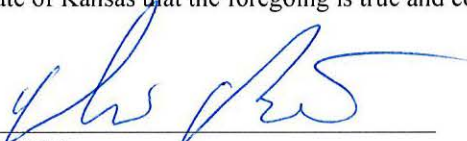
3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF  
I/CAF II, A-CAM/ACAM II/EACAM, RBE, RDOF, and/or KUSF received by S&A Telephone Company

**Docket No. 24-GIMT-612-GIT**  
**Attachment 1**

(Company/Cooperative) was used in the proceeding calendar year 2023 and will be used in the new calendar year 2025 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal Telecommunications Act, and/or Kansas statutes and KCC requirements.

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.)

  
\_\_\_\_\_  
Signature

Chris Reno  
Printed/Typed Name

Executed on June 29, 2024 date.

Email address: [Chris.Reno@highlinefast.com](mailto:Chris.Reno@highlinefast.com)

Company Name: S&A Telephone Company

DATA YEAR: 2023

LINE	REGULATED AMOUNT
WORKING LOOPS	
1. Total Loops	
2. Category 1.3 Loops	
3. Consumer Broadband-only Loops	
INVESTMENT** Remove all BLS only investments	
1. Plant Accounts	
a. Acct 2001 - Telephone Plant in Service	
2. Selected Plant Accounts	
a. Acct 2210 - Central Office Switching	
b. Acct 2220 - Operator System Equipment	
c. Acct 2230 - Central Office Transmission	
d. Total Central Office Equip	
e. Circuit Equip Cat 4.13	
f. Acct 2410 - Cable & Wire Facilities Total	
AMORTIZABLE TANGIBLE ASSETS	
Acct. 2680 - Tangible Assets	
Acct. 2680 (2230) - Central Office Transmission	
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	
Acct. 2680 (2410) Cable & Wire Facilities	
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	
Acct. 6560 (2680) Dep & Amort	
PART 36 - COST STUDY DATA	
1. Acct. 2410 - Cost Study Avg C&WF	
2. Cost Study Avg C&WF Cat 1	
3. C&WF CAT 1 Factor	
4. COE CAT 4.13 Factor	
5. Switching Factor	

**For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year**

LINE	REGULATED AMOUNT
INVESTMENT, EXPENSE AND TAXES**	
Remove all BLS only amounts	
1. Selected Plant Accounts	
a. Acct 2230 - Central Office Transmission	
b. Total Central Office Equip	
c. Acct 2410 - Cable & Wire Facilities Total	
2. Expenses - Plant Specific Exp	
a. Acct 6110 - Network Support Total	
b. Acct 6110 - Network Support Benefits	
c. Acct 6110 - Network Support Rents	
d. Acct 6120 - General Support Total	
e. Acct 6120 - General Support Benefits	
f. Acct 6120 - General Support Rents	

Company Name: S&A Telephone Company

DATA YEAR: 2023

- g. Acct 6210 - Central Office Switching Total
- h. Acct 6210 - Central Office Switching Benefits
- i. Acct 6210 - Central Office Switching Rents
- j. Acct 6220 - Operator Systems Total
- k. Acct 6220 - Operator Systems Benefits
- l. Acct 6220 - Operator Systems Rents
- m. Acct 6230 - Central Office Transmission Total
- n. Acct 6230 - Central Office Transmission Benefits
- o. Acct 6230 - Central Office Transmission Rents
- p. Total - Central Office (Acct. 6210 - 6230)**
- q. Acct 6410 - Cable & Wire Facilities
- r. Acct 6410 - Cable & Wire Facilities Benefits
- s. Acct 6410 - Cable & Wire Facilities Rents
- t. Total Plant Specific Expense (Accts. 6110 - 6410)**

- 3. Expenses - Plant Non Specific Exp
  - a. Acct 6530 - Network Operations
  - b. Acct 6530 - Network Operations Benefits
- 4. Depreciation & Amortization Exp
  - a. Acct 6560 (#2210) - Central Office Switching
  - b. Acct 6560 (#2220) - Operator Systems
  - c. Acct 6560 (#2230) - Central Office Transmission
  - d. Acct 6560 (#2210-2230) - Total
  - e. Acct 6560 (#2410) - Cable & Wire Facilities
- 5. Corporate Operating Expenses
  - a. Acct 6710 - Executive & Planning
  - b. Acct 6710 - Executive & Planning Benefits
  - c. Acct 6720 - General Admin
  - d. Acct 6720 - General Admin Benefits
  - e.Total Corporate Operating Expense  
(line 535+550)**
- 6. Other Expenses and Revenues
  - a. Benefits Portion
  - b. Rents Portion
- Total Expenses (Excluding Depreciation)
- 7. Operating Taxes
  - a. Acct 7200

Test for use of FUSF & KUSF

CAPITAL:

- 1. Category 1 C&WF
- 2. Category 4.13 COE and Switching

MAINTENANCE:

- 3. CWF - MAINT. EXP.
- 4. COE - MAINT. SW
- 5. COE - MAINT-OP SYSTEM
- 6. COE - MAINT. - TRANS.

Company Name: S&A Telephone Company

DATA YEAR: 2023

7. CWF - NETWORK SUPPORT  
8. COE - NETWORK SUPPORT

9. CWF GENERAL SUPPORT  
10. COE GENERAL SUPPORT

20. CWF NETWORK OPERATION  
21. COE NETWORK OPERATION

22. CWF EXEC. & PLANNING  
23. COE EXEC. & PLANNING

24. CWF GENERAL ADMIN.  
25. COE GENERAL ADMIN.

26. CWF OPERATING TAXES  
27. COE OPERATING TAXES

28. CWF BENEFITS - TTL OPER EXP  
29. COE BENEFITS - TTL OPER EXP

30. CWF RENTS - TTL OPER EXP  
31. COE RENTS - TTL OPER EXP

**A. Total Cash Expenditures Associated with USF**

**B. Certified Federal USF Receipts:**

B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)  
B2. Safety Valve Support for acquired Exch. (SVS)  
B3. Alternative Connect America Model (ACAM/ACAM II)  
B4. Connect America Fund, Phase I, II (CAF I/CAF II)  
B5. Rural Digital Opportunity Fund, Phase I (RDOF I)  
B6. Rural Broadband Experiment (RBE)

**B7. Total Federal USF Receipts**

C. Gross KUSF Receipts (do not deduct KUSF assessments)

**D. Total FUSF and KUSF Receipts**

E. Do Expenditures Exceed FUSF Receipts?

Amount Expenditures Exceed Certified FUSF

(negative number means FUSF exceeds Expenditures)

F. Do Expenditures Exceed FUSF & KUSF Receipts?

Amount Expenditures Exceed Certified FUSF & KUSF

(negative number means FUSF & KUSF exceeds Expenditures)

Please provide the following information:

Contact: Chris Reno

Title: Vice President - Controller

Phone No.: 307-600-000

E-Mail: chris.reno@highlinefast.com

REDACTED

Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification

24-GIMT-612-GIT  
Attachment 2a

Company Name: S&A Telephone Company

DATA YEAR: 2023

Company Name: S&A Telephone Company

DATA YEAR: 2023

	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops		
2. Category 1.3 Loops		
3. Consumer Broadband-only Loops		
INVESTMENT** Remove all BLS only investments		
1. Plant Accounts		
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Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission		
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**For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year**

INVESTMENT, EXPENSE AND TAXES\*\*

Remove all BLS only amounts

LINE	REGULATED AMOUNT
1. Selected Plant Accounts	
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b. Total Central Office Equip	
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b. Acct 6110 - Network Support Benefits	
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Company Name: S&A Telephone Company

DATA YEAR: 2023

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- l. Acct 6220 - Operator Systems Rents
- m. Acct 6230 - Central Office Transmission Total
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- o. Acct 6230 - Central Office Transmission Rents
- p. Total - Central Office (Acct. 6210 - 6230)**
- q. Acct 6410 - Cable & Wire Facilities
- r. Acct 6410 - Cable & Wire Facilities Benefits
- s. Acct 6410 - Cable & Wire Facilities Rents
- t. Total Plant Specific Expense (Accts. 6110 - 6410)**

- 3. Expenses - Plant Non Specific Exp
  - a. Acct 6530 - Network Operations
  - b. Acct 6530 - Network Operations Benefits
- 4. Depreciation & Amortization Exp
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  - b. Acct 6560 (#2220) - Operator Systems
  - c. Acct 6560 (#2230) - Central Office Transmission
  - d. Acct 6560 (#2210-2230) - Total
  - e. Acct 6560 (#2410) - Cable & Wire Facilities
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  - a. Acct 6710 - Executive & Planning
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- 3. CWF - MAINT. EXP.
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- 6. COE - MAINT. - TRANS.

Company Name: S&A Telephone Company

DATA YEAR: 2023

7. CWF - NETWORK SUPPORT  
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9. CWF GENERAL SUPPORT  
10. COE GENERAL SUPPORT

20. CWF NETWORK OPERATION  
21. COE NETWORK OPERATION

22. CWF EXEC. & PLANNING  
23. COE EXEC. & PLANNING

24. CWF GENERAL ADMIN.  
25. COE GENERAL ADMIN.

26. CWF OPERATING TAXES  
27. COE OPERATING TAXES

28. CWF BENEFITS - TTL OPER EXP  
29. COE BENEFITS - TTL OPER EXP

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**A. Total Cash Expenditures Associated with USF**

**B. Certified Federal USF Receipts:**

B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)  
B2. Safety Valve Support for acquired Exch. (SVS)  
B3. Alternative Connect America Model (ACAM/ACAM II)  
B4. Connect America Fund, Phase I, II (CAF I/CAF II)  
B5. Rural Digital Opportunity Fund, Phase I (RDOF I)  
B6. Rural Broadband Experiment (RBE)

**B7. Total Federal USF Receipts**

C. Gross KUSF Receipts (do not deduct KUSF assessments)

**D. Total FUSF and KUSF Receipts**

E. Do Expenditures Exceed FUSF Receipts?

Amount Expenditures Exceed Certified FUSF

(negative number means FUSF exceeds Expenditures)

F. Do Expenditures Exceed FUSF & KUSF Receipts?

Amount Expenditures Exceed Certified FUSF & KUSF

(negative number means FUSF & KUSF exceeds Expenditures)

Please provide the following information:

Contact: Chris Reno

Title: Vice President - Controller

Phone No.: 307-600-000

E-Mail: chris.reno@highlinefast.com

**REDACTED**

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**24-GIMT-612-GIT  
Attachment 2a**

**Company Name:** *S&A Telephone Company*

**DATA YEAR:** *2023*

## Narrative Report for New Investments

ETC Certification for Use of **USF** Support  
Provided to the Kansas Corporation Commission

Company Name: S&A Telephone Company

Data Year: 2023

					Amount Used in the USF Supported Areas
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	
A	B	C	D	E	F= C x D
Subtotal					
Total					

NOTES:

**This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255).**

Contact: Chirs Reno  
Title: Vice President – Controller

Phone No.: 307-600-0000  
E-Mail: Chris.Reno@highlinefast.com

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

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?

**(Yes/No) . IF YES, PLEASE COMPLETE THE FOLLOWING:**

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
1/25/2023 0:22	Config bug led to DHCP issue	data	Allen/Scranton	Fixed config bug	418
2/10/23 15:37	Cisco bug in Denver router	Data/voice	Allen/Scranton	Bug fixed	565
2/16/23 8:06	Pseudo wire failure	Data/voice	Allen/Scranton	Fixed software bug	565
2/24/23 18:30	DDOS attack	Data/voice	Allen/Scranton	DDOS mitigation	565
4/7/23 13:46	GR303 failure	voice	Allen	Reboot C15 switch and bug fixes	100
6/2/23 6:26	Config error	Data/voice	Allen/Scranton	Fixed config error	493

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

No Requests that were unable to be fulfilled

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

No Filed complaints this calendar year.

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 WIRELINE ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is Vice President-Controller of S&A Telephone Company (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding S&A Telephone Company (Company) to the statements made in this certification.

2. By this affidavit, I certify that S&A Telephone Company (Company) 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 June 29<sup>th</sup>, 2024 (date).

  
Signature

Chris Reno

Printed/Typed Name

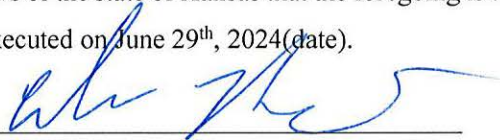
**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION****KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is Vice President-Controller of S&A Telephone Company (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding S&A Telephone Company (Company) to the statements made in this certification..

2. By this affidavit, I certify that S&A Telephone Company (Company) is in compliance with the CTIA Code.

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 June 29<sup>th</sup>, 2024(date).



Signature

Chris Reno

Print / Typed Name



5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 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 Vice President-Controller of S&A Telephone Company (Company/ Cooperative). 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 S&A Telephone Company (Company) to the statements made in this certification.

2. By this affidavit, I certify that I am binding S&A Telephone Company (Company) 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 June 29<sup>th</sup>, 2024(date).



Signature

Chris Reno

Printed / Typed Name



**24-GIMT-612-GIT**  
**Attachment 5**

**6.** 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline services) throughout the service area for which it has been designated “using media of general distribution.” **Please complete the following:**

[illegible]


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

N/A - S&A Telephone Company is an ILEC