

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

**In the Matter of the Application and Request )  
Of United Telephone Association, Inc. for an ) Docket No. 20-UTAT-032-KSF  
Increase in its Cost-Based Kansas Universal )  
Service Fund Support. )**

**DIRECT TESTIMONY  
PREPARED BY  
KATIE L. FIGGS  
UTILITIES DIVISION  
KANSAS CORPORATION COMMISSION  
December 13, 2019**

1 **Q. Would you please state your name and business address?**

2 A. My name is Katie L. Figgs. My business address is 1500 Southwest Arrowhead Road,  
3 Topeka, Kansas, 66604.

4  
5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the Kansas Corporation Commission (KCC or Commission) as a  
7 Senior Auditor.

8  
9 **Q. Would you please describe your educational background and business experience?**

10 A. I received a Bachelor's of Business Administration with an emphasis in Accounting from  
11 Washburn University in May of 2011. I began employment with the Commission as a  
12 Regulatory Auditor in August 2012 and then was promoted to my current position in  
13 November 2016.

14  
15 **Q. Have you ever testified before the Commission?**

16 A. Yes. I have filed testimony before the Commission in Docket Nos. 12-LHPT-875-AUD,  
17 13-JBNT-437-KSF, 13-PLTT-678-KSF, 14-ATMG-320-RTS, 14-S&TT-525-KSF, 15-  
18 MRGT-097-AUD, 15-WSEE-115-RTS, 15-TWVT-213-AUD, 16-ATMG-079-RTS, 17-  
19 RNBT-555-KSF, 18-WSEE-328-RTS, 18-KGSG-560-RTS, 19-EPDE-223-RTS, and 19-  
20 GNBT-505-KSF.

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**EXECUTIVE SUMMARY**

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**Q. What were your responsibilities in the review of United Telephone Association, Inc.'s (United) July 24, 2019, Application?**

A. My responsibilities as a Senior Auditor were to analyze, audit, and review United's filing before the Commission to determine its cost-based Kansas Universal Service Fund (KUSF) support to reflect its current revenue requirement and circumstances. I reviewed the Company's filing, requested and analyzed additional information, and participated in an on-site review at the Company's headquarters in Dodge City, Kansas, to inspect records, tour the Company's facilities, and to confer with United's management and consultant. In addition, I calculated and am sponsoring selected Staff adjustments to United's Pro Forma Income Statement. My duties were carried out under the direction of the Senior Managing Auditor, Andria Jackson, and the Chief of Accounting and Financial Analysis, Justin Grady.

**Q. What is the purpose of your testimony in this proceeding?**

A. The purpose of my testimony is to sponsor adjustments based on Staff's review of United's Application. In summary, I recommend that the Commission:

- Update KUSF support included in United's filing to reflect the most current amounts;
- Update Intrastate Access Revenue as appropriate;
- Update estimated audit expenses included in United's filing to known audit expenses at the time of Staff's filing;



1 rate-of-return companies to become effective March 1, 2019. Pursuant to K.S.A.  
2 66-2005(d), changes in revenue due to the changes in the affordable monthly rate  
3 are to be netted against KUSF support payments. In other words, KUSF support  
4 payments are to be decreased by the amount of the additional revenue generated  
5 with the increase in local rates. Staff's adjustment recognizes the increase in local  
6 revenue not reflected in the test year.

- 7 ■ A decrease to KUSF support of \$75. This component of Staff's adjustment  
8 updates the KUSF support included in the Application to reflect the Commission-  
9 approved annual support for KUSF Year 23 provided in Sandy Reams' direct  
10 testimony in the 19-056 Docket.<sup>2</sup>

11  
12 **Q. Please continue by discussing Staff Adjustment No. 10 to the Income Statement.**

13 A. Staff Adjustment No. 10 (IS-10) increases United's Intrastate Access Revenue by \$1,075  
14 on a total company basis.<sup>3</sup> United's adjustment IS-3 reduces intrastate terminating access  
15 revenue by \$1,075 to reflect the calculated 5% annual reduction between its FY  
16 2018/2019<sup>4</sup> and FY 2019/2020<sup>5</sup> intrastate revenue requirement. United's adjustment is  
17 based on the Federal Communications Commission's (FCC) Intercarrier Compensation  
18 (ICC) reforms.<sup>6</sup> The FCC's ICC reforms allow a rate-of-return carrier to recover changes  
19 to its interstate and intrastate terminating access revenues based on its frozen Fiscal Year

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<sup>2</sup> *Direct Testimony of Sandy Reams*, 19-056 Docket, Attachment A (Dec. 14, 2018).

<sup>3</sup> See Exhibit KLF-2.

<sup>4</sup> FY 2018/2019 encompasses July 2018-June 2019. See Docket No. 18-GIMT-448-GIT, June 13, 2018 United Telephone Association, Inc.'s 2018 Confidential CAF/ICC Data Collection and Associated Certifications.

<sup>5</sup> FY 2019/2020 encompasses July 2019 – June 2020. Docket No. 19-GIMT-423-GIT, June 17, 2019 United Telephone Association, Inc.'s 2019 Confidential CAF/ICC Data Collection and Associated Certifications.

<sup>6</sup> See *in the Matter of Connect America Fund*, 26 F.C.C. Rcd. 17663 (Nov. 18, 2011).

1 2011<sup>7</sup> interstate and intrastate switched access and reciprocal compensation revenue  
2 requirements.<sup>8</sup> The FCC's methodology reduces the amount of recovery by 5% annually.  
3 The FCC established two recovery Mechanisms, the Connect America Fund (CAF) and  
4 the Access Recovery Charge (ARC), through which carriers would recover the reduction  
5 in access revenues.

6 K.S.A. 66-2005(c)(1) provides:

7 Any reduction of a rural telephone company's cost recovery due to  
8 reduction of its intrastate access revenue, except such revenue recovered  
9 from another support mechanism, shall be recovered from the KUSF.  
10

11 Staff's adjustment, therefore, reverses United's proposed adjustment IS-3 since it  
12 does not recognize the intrastate terminating access revenue the Company received  
13 during the test year, the actual intrastate terminating access revenue the Company has  
14 received in 2019, or any revenue recovered through the CAF or ARC recovery  
15 mechanisms.<sup>9</sup>  
16

17 **Q. Please continue by discussing Staff Adjustment No. 11 to the Income Statement.**

18 A. Staff Adjustment No. 11 (IS-11) decreases United's operating expense by \$17,784.<sup>10</sup>

19 This adjustment is necessary to include actual audit expense incurred as of October 31,  
20 2019, to reflect expenses incurred in this Docket.  
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<sup>7</sup> FY 2011 encompasses Oct. 2010 – Sept. 2011. See 47 CFR § 51.903(e); 47 CFR 51.917.

<sup>8</sup> *Id.*, at ¶ 39.

<sup>9</sup> See Docket No. 16-GIMT-468-GIT, April 26, 2016 Opening Docket to Determine Intrastate Access Revenues Due to Rural Local Exchange Carriers, ¶10-11, discussing information an RLEC is to provide regarding the recovery of intrastate terminating access revenues; July 12, 2016 Order, ¶6-7. See also *Bluestem Tel. Co. v. Kansas Corp. Comm'n*, 52 Kan.App.2d 96 (2015).

<sup>10</sup> See Exhibit KLF-3.

1 **Q. Please explain how Staff calculated its adjustment for audit expense.**

2 A. Staff's adjustment reflects a total of United's audit expense and Staff's audit expense.  
3 According to the updated response to Staff Data Request No. 77, United has incurred  
4 \$39,448 of external consulting services and legal fees related to this Docket through  
5 October 2019. TCA's final billing for work completed in November is not yet complete,  
6 and therefore, has not been included. Staff acknowledges that its adjustment does not  
7 fully recognize the costs that may have been incurred by United; however, the adjustment  
8 does recognize all invoices Staff has received from the Company to date.

9 According to the Commission's fiscal department, the maximum assessment for  
10 United for the fiscal year is \$22,238. This amount was calculated pursuant to K.S.A. 66-  
11 1502 (a), which provides a maximum annual assessment of 0.6% of intrastate revenues  
12 for any public utility or common carrier under the jurisdiction of the Commission. Since  
13 United has paid a total of \$607 in assessments to date, the remaining maximum  
14 assessment for the fiscal year is \$21,631. Actual Staff expenses incurred for this Docket  
15 total \$30,530 through November 23, 2019. Therefore, because Staff's actual expenses  
16 are greater than the allowable remaining assessment, the audit expense reflected in Staff's  
17 audit expense calculation is the remaining maximum assessment amount of \$21,631. The  
18 sum of United's invoices and Staff's remaining maximum assessment amount over a  
19 five-year period, results in an annual audit expense amortization of \$12,216. Staff then  
20 compared this amount with the estimated rate case expense included in United's  
21 Application, with the difference being Staff's adjustment.

22

1 **Q. Should the Commission reduce United's KUSF support once the audit expense has**  
2 **been fully recovered?**

3 A. Yes. Staff recommends that the Commission reduce United's approved KUSF draw by  
4 the audit expense amortization at the end of the amortization period. This  
5 recommendation is consistent with the Commission Order in *Craw-Kan Telephone*  
6 *Cooperative, Inc.'s (Craw-Kan) KUSF filing in Docket No. 13-CRKT-268-KSF (13-268*  
7 *Docket)*, which states:

8 With regard to *Craw-Kan's* audit expense, the Commission agrees that audit  
9 expense should be recovered over a five-year amortization period. However,  
10 once these expenses have been fully covered, *Craw-Kan's* KUSF support should  
11 be reduced accordingly by removing any portions relating to audit expense. This  
12 provision ensures *Craw-Kan* will recover the full amount of its audit expense but  
13 does not over-recover from the KUSF.<sup>11</sup>  
14

15 **Q. Please continue by discussing Staff Adjustment No. 12 to the Income Statement.**

16 A. Staff Adjustment No. 12 (IS-12) decreases United's operating expenses by \$7,158 on a  
17 total company basis, or \$4,818 on an intrastate basis.<sup>12</sup> Staff's adjustment to property  
18 taxes is comprised of two components. The first component is Staff's calculation of  
19 United's 2018 property tax expense, which is derived by taking the sum of United's 2018  
20 property tax statements totaling \$135,483 less its 2018 Kansas Telecom Credit totaling  
21 \$15,410. The second component is Staff's calculation of property tax expense allocable  
22 to the non-regulated portion of United's general support assets and plant assets. In  
23 determining the amount of property tax to be allocated to non-regulated assets, Staff took  
24 the Company's total plant in service balances as of December 31, 2018, and then applied

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<sup>11</sup> *Order Granting Joint Motion for Approval of Craw-Kan's Annual Cost-Based KUSF Support and for Approval of Additional Requirements*, 13-268 Docket, p. 5, ¶16 (Apr. 17, 2013).

<sup>12</sup> See Exhibit KLF-4.



1 Staff's allocation factors, as discussed in the testimony of Staff witness Ann Diggs, for  
2 the general support assets to determine the appropriate percentage of regulated general  
3 support assets. Additionally, Staff also calculated the percentage of regulated assets  
4 applicable to digital switching, circuit equipment, and buried cable. As depicted in  
5 Exhibit KLF-4(b), this resulted in an overall regulated percentage of 93.78%. This  
6 regulated percentage was then applied to Staff's adjusted 2018 property tax expense,  
7 resulting in a total of \$112,606 of regulated property taxes recoverable through the  
8 KUSF. Staff's adjusted 2018 regulated property tax expense is then compared to  
9 United's normalized property tax expense of \$119,764, with the difference being Staff's  
10 adjustment.

11  
12 **Q. Please continue by discussing Staff Adjustment No. 13 to the Income Statement.**

13 A. Staff Adjustment No. 13 (IS-13) decreases United's operating expenses by \$6,228 on a  
14 total company basis, or \$3,034 on an intrastate basis.<sup>13</sup> Staff's adjustment removes 100%  
15 of expenses related to corporate image advertising, sales and promotional advertising, and  
16 telephone directory advertising that Staff contends are not necessary to provide sufficient  
17 and efficient regulated telephone service. As supported by prior Commission Order,<sup>14</sup>  
18 these expenses are inappropriate for recovery through the KUSF support mechanism.

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<sup>13</sup> See Exhibit KLF-5.

<sup>14</sup> See June 25, 2001, Commission Order in Docket No. 01-RRLT-083-AUD, ¶ 32.

1 **Q. Please continue by discussing Staff Adjustment No. 14 to the Income Statement.**

2 A. Staff Adjustment No. 14 (IS-14) decreases United's operating expenses by \$4,615 on a  
3 total company basis, or \$2,501 on an intrastate basis.<sup>15</sup> Staff's adjustment removes 100%  
4 of dues and donations made by United to various vendors. Specifically, Staff's adjustment  
5 eliminates: (1) dues for various trade organizations, as well as newspaper subscriptions and  
6 annual membership fees; and (2) charitable donations made to local high schools for after  
7 prom activities. As discussed in greater detail below, these expenses are not necessary to  
8 provide sufficient and efficient regulated telephone service.

9  
10 **Q. Please provide a more detailed explanation of why Staff is recommending 100%  
11 removal of dues and donations.**

12 A. In the past, Staff has made recommendations to remove a portion of dues and donations  
13 pursuant to K.S.A. 66-1,193(a), which allows the Commission to adopt a policy of  
14 disallowing up to 50% of utility dues, donations and contributions to charitable, civic and  
15 social organizations and entities, in addition to completely disallowing specific dues,  
16 donations and contributions which are found unreasonable or inappropriate. However, in  
17 this Docket and going forward, Staff is recommending the Commission disallow these  
18 types of expenses from being recovered through KUSF support in light of the 2018 Order  
19 approved by the Federal Communications Commission (FCC).<sup>16</sup> Specifically, paragraph  
20 28 of the FCC Order states:

21 *Expenses Unrelated to Operations.* – We next codify the existing prohibitions on  
22 recovering support for expenses unrelated to operations – including political  
23 contributions, charitable donations, scholarships, membership fees and dues in

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<sup>15</sup> See Exhibit KLF-6.

<sup>16</sup> Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking, FCC 18-29 (Mar. 23, 2018), (2018 FCC Order) See <https://docs.fcc.gov/public/attachments/FCC-18-29A1.pdf>.

1 clubs and organizations, sponsorships of conferences or community events, and  
2 penalties or fines for statutory or regulatory violations, penalties or fees for late  
3 payments on debt, loans, or other payments – from high-cost support... Expenses  
4 unrelated to operations, however, are not currently included in these high-cost  
5 support calculations. Instead, under our current rules, “nonoperating expenses” –  
6 including political contributions, contributions for charitable, social, or community  
7 welfare purposes, membership fees and dues in social, service and recreational or  
8 athletic clubs and organizations, and penalties and fines on account of violations of  
9 statutes – are recorded in Account 7300, presumed excluded from the costs of  
10 service in setting rates, and not included in high-cost support calculations. Expenses  
11 unrelated to operations have historically not been recoverable from high-cost  
12 support because by definition these expenses are not operational in nature and are  
13 ancillary to core business objectives. Expenses must fall within the scope of the  
14 statutory requirement that support be used “only for the provision, maintenance,  
15 and upgrading of facilities and services for which support is intended.”<sup>17</sup>  
16

17 Furthermore, the disallowance of these expenses are further discussed and reiterated in  
18 paragraphs 31 and 32 of the FCC Order, which states in part:

19 Charitable donations and scholarships are expenses unrelated to operations that  
20 may not be recovered from high-cost support. We recognize the benefits charitable  
21 donations provide to the community... [h]owever, charitable donations are  
22 unrelated to the provision, maintenance, and upgrading of facilities and services for  
23 which the high-cost support is intended.<sup>18</sup>  
24

25 Membership fees and dues in clubs and organizations, including social, service, and  
26 recreational or athletic clubs and organizations, as well as trade associations and  
27 organizations that provide professional or trade certifications such as state bar  
28 associations, are expenses unrelated to operations excluded from high-cost  
29 support... We recognize the educational and training benefits that trade associations  
30 provide and that membership in chambers of commerce may help stimulate  
31 business. However, as other commenters acknowledge, a function of many of these  
32 organizations is advocacy on behalf of their members for the purpose of influencing  
33 public policy which is not used for the provision, maintenance, and upgrading of  
34 facilities and services for which support is intended. Just as ETCs may not recover  
35 lobbying expenses under our rules, similarly, they may not recover membership  
36 fees in organizations that engage in lobbying. Further, professional affiliations or  
37 certifications such as state bar associations, accounting associations, or other  
38 professional groups may facilitate general corporate functions but are not used only  
39 for the provision of supported facilities and services.<sup>19</sup>

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<sup>17</sup> *Ibid.*, pp. 13-14.

<sup>18</sup> *Ibid.*, p. 15.

<sup>19</sup> *Ibid.*, pp. 15-16.

1           Therefore, consistent with the FCC's ruling on these types of unrelated operational  
2           expenses and to prevent the KUSF from subsidizing expenses not recovered via the federal  
3           universal service fund high-cost support mechanisms, Staff finds these expenses  
4           inappropriate to recover from the KUSF as they are unnecessary for the provision of  
5           sufficient and efficient universal service.

6  
7   **Q.    Please continue by discussing Staff Adjustment No. 15 to the Income Statement.**

8   A.    Staff Adjustment No. 15 (IS-15) decreases United's operating expenses by \$3,090 on a  
9           total company basis, or \$1,674 on an intrastate basis.<sup>20</sup> Staff's adjustment removes the  
10          lobbying expenses recorded by United during the test year. The Commission has  
11          historically disallowed political contributions, lobbying, and legislative expenses as costs  
12          that cannot be recovered from customers or through KUSF support. Lobbying is not  
13          necessary for the provision of safe and reliable utility service and benefits the Company,  
14          not ratepayers. Staff's adjustment is consistent with past Commission practice to remove  
15          all expenses related to lobbying that are included in the cost of service.<sup>21</sup>

16  
17   **Q.    Please continue by discussing Staff Adjustment No. 16 to the Income Statement.**

18   A.    Staff Adjustment No. 16 (IS-16) decreases United's operating expenses by \$2,723 on a  
19           total company basis, or \$1,476 on an intrastate basis.<sup>22</sup> This adjustment eliminates certain  
20          miscellaneous expenses recorded by United during the test year. More specifically, this  
21          adjustment removes: (1) Survey Monkey expense totaling \$348; (2) employee gifts totaling

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<sup>20</sup> See Exhibit KLF-7.

<sup>21</sup> *Order Setting Revenue Requirements*, Docket No. 01-RRLT-083-AUD, p. 10, ¶29 (Jun. 26, 2001).

<sup>22</sup> See Exhibit KLF-8.

1 \$4,542; and (3) entertainment/party expenses totaling \$3,673. Staff considers Survey  
2 Monkey as an expense related to corporate image advertising and is not necessary to  
3 provide sufficient and efficient regulated telephone service. In addition, Staff contends  
4 that the employee gifts and party expenses are personal and/or entertainment-related  
5 expenses and should not be recovered through the KUSF support. This is discussed in  
6 greater detail below.

7  
8 **Q. Does the FCC address personal expenses in its 2018 Order referenced above?**

9 A. Yes. The portion of Staff's adjustment related to personal and/or entertainment related  
10 expenses is consistent with prior recommendations made by Staff in other dockets, as well  
11 as the 2018 FCC Order. The FCC specifically addresses these types of expenses in  
12 paragraph 19 of the Order, which states:

13 [w]e codify the existing prohibition on recovery from the high-cost program for  
14 personal expenses of employees, board members, family members of employees  
15 and board members, contractors, or any other individuals affiliated with the ETC,  
16 including but not limited to personal expenses for personal travel, personal vehicles,  
17 housing, such as rent, mortgages, or housing allowances, childcare, employee gifts,  
18 and entertainment-related expenses including food and beverage, regardless of  
19 whether such expenses are paid directly by the individual or indirectly by the carrier  
20 in the form of allowances or gifts. Personal expenses are clearly not used for the  
21 provision of supported services and thus may not be recovered through high-cost  
22 support. Furthermore, we caution recipients of high-cost support that recovering  
23 these types of expenses from high-cost support may constitute outright fraud, waste,  
24 and abuse on the Fund, subjecting employees, executives, and board members to  
25 personal civil and criminal liability.<sup>23</sup>  
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<sup>23</sup> 2018 FCC Order, p. 10.

1 **Q. Please continue by discussing Staff Adjustment No. 17 to the Income Statement.**

2 A. Staff Adjustment No. 17 (IS-17) decreases United’s operating expenses by \$5,970 on a  
3 total company basis, or \$3,350 on an intrastate basis.<sup>24</sup> This adjustment eliminates various  
4 refreshment expenses recorded by United during the test year. More specifically, this  
5 adjustment removes the following:

- 6           ▪ Employee meal and food expenses totaling \$4,810;
- 7           ▪ Coffee and supplies totaling \$2,515; and
- 8           ▪ Pop, water, plates, utensils, ice, and popcorn expenses totaling \$8,792.

9  
10 **Q. Please provide more detail of the portion of Staff’s adjustment related to removing**  
11 **meal expenses.**

12 A. Staff’s adjustment removes 100% of employee meals included in United’s test year  
13 expenses related to manager meeting meals, employee meeting meals, employee  
14 appreciation meals, etc., as these expenses are not necessary for the provision of sufficient  
15 and efficient regulated telephone service. Staff’s adjustment is consistent with FCC rules  
16 discussed in detail in paragraph 26 of its 2018 Order, which states:

17           Entertainment and food and beverage expenses, including but not limited to  
18           expenses incurred for meals to celebrate personal events, such as weddings, births,  
19           or retirements, are explicitly not recoverable through high-cost support. Some  
20           commenters agree that entertainment expenses in particular have not been  
21           recoverable in the past. Other commenters disagree, claiming that recovering  
22           entertainment expenses incurred for “client or vendor meetings, or attendance at  
23           board meetings” is a “common and accepted practice.” Some commenters maintain  
24           that they should be able to include food and beverage and entertainment expenses  
25           related to annual meetings, employee recognition, parties or picnics because such  
26           events build morale and improve service quality. The question is whether these  
27           expenses are used only for the provision, maintenance, and upgrading of facilities  
28           and services for which high-cost support is intended – not whether they are  
29           beneficial, desirable or common practice. Because these expenses do not meet our

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<sup>24</sup> See Exhibits KLF-9 and KLF-9(a).

1 interpretation of what the statutory standard requires, we exclude them from high-  
2 cost support.<sup>25</sup>  
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4 Staff acknowledges that meals provided during business-related travel may qualify as a  
5 reasonable expense to recover from the KUSF support; however, Staff agrees with the FCC  
6 Order and finds additional expenses related to employee lunches and board member meals  
7 to be excessive and unnecessary for the provision of universal service.  
8

9 **Q. Please continue by discussing Staff Adjustment No. 18 to the Income Statement.**

10 A. Staff Adjustment No. 18 (IS-18) decreases United's operating expenses by \$617 on a total  
11 company basis, or \$334 on an intrastate basis.<sup>26</sup> This adjustment removes fitness  
12 membership expenses for the months of September, October, November, and December of  
13 the test year. United removed fitness membership expenses for the months January through  
14 August 2018 within the cost study adjustment for Account No. 6720. In response to Staff  
15 Data Request No. 98, United explains that its fitness membership policy is to pay half of  
16 gym membership fees for employees. Staff's adjustment removes the remaining fitness  
17 membership expenses left in the cost of service as these expenses are not necessary for the  
18 provision of sufficient and efficient regulated telephone service and, therefore, are  
19 inappropriate to be recovered through the KUSF support mechanism.  
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<sup>25</sup> *Ibid.*, pp. 12-13.

<sup>26</sup> See Exhibit KLF-10.

1 **Q. Please continue by discussing Staff Adjustment No. 19 to the income statement.**

2 A. Staff Adjustment No. 19 (IS-19) decreases United's operating expenses by \$6,784 on a  
3 total company basis, or \$3,676 on an intrastate basis.<sup>27</sup> Staff's adjustment removes a  
4 portion of expenses recorded during the test year for employee clothing expenditures.

5  
6 **Q. Before explaining Staff's adjustment to employee clothing expenses, please explain  
7 United's employee clothing allowance policy.**

8 A. While the Company has no written clothing allowance policy, United allows employees  
9 an annual clothing allowance of up to \$400. Employees are allowed to purchase work  
10 clothing that is suitable for their department from wherever they chose, submit the  
11 receipts and then reimbursed by the Company.<sup>28</sup> Employees are also allowed to purchase  
12 items on their company credit card and order logoed items from EmbroidMe which are  
13 both directly paid for by the Company. During the test year, United incurred a total  
14 expense of \$29,197 for employee clothing allowance.

15  
16 **Q. Please explain Staff's calculation of its adjustment to employee clothing expenses.**

17 A. Staff's adjustment is comprised of two components. First, Staff calculated a reasonable  
18 price of a company business shirt totaling \$38.30. This amount consists of: (1) the cost of  
19 a quality business shirt purchased from Lands' End of \$31.30<sup>29</sup>; and (2) a \$7 company  
20 logo embroidery fee. Staff found these amounts to be reasonable and is consistent with

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<sup>27</sup> See Exhibit KLF-11.

<sup>28</sup> See United Telephone Association, Inc.'s Response to Staff Data Request No. 96

<sup>29</sup> Staff researched the prices of various shirts on Land's End website and was able to find quality, professional looking polo shirts (in both men's and women's clothing sizes) for \$31.28, including the price of the shirt, tax, and shipping. This pricing information is available upon request.



1 Staff's recommendation in Golden Belt's recent filing. Staff then calculated the total  
2 annual cost of employee shirts totaling \$8,732 and compared it to the clothing expenses  
3 totaling \$29,197 in the test year, with the difference being Staff's adjustment (prior to  
4 separations).

5 While Staff understands the need for employees to look professional and be easily  
6 identified by customers as employees of the Company for business purposes, Staff views  
7 the annual \$400 clothing allowance policy as excessive and, therefore, inappropriate to  
8 recover from KUSF support.

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10 **Q. Does this conclude your testimony?**

11 A. Yes, thank you.

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**SUMMARY OF EXHIBITS**

	<u>Exhibit No.</u>	<u>Description</u>
1		
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4	KLF-1	Work paper for KUSF Adjustment
5	KLF-2	Work paper for Intrastate Access Revenue Adjustment
6	KLF-3	Work paper for Audit Expense Adjustment
7	KLF-4	Work paper for Property Tax Adjustment
8	KLF-4(a)	Detail work paper for 2018 Property Tax Expense Detail
9	KLF-4(b)	Detail work paper for Property Tax Regulated Percentage Calculation
10	KLF-5	Work paper for Advertising Expense Adjustment
11	KLF-6	Work paper for Dues and Donations Adjustment
12	KLF-7	Work paper for Lobbying Adjustment
13	KLF-8	Work paper for Miscellaneous Expense Adjustment
14	KLF-9	Work paper for Refreshments Adjustment
15	KLF-9(a)	Detail work paper for Refreshments Adjustment
16	KLF-10	Work paper for Fitness Membership Adjustment
17	KLF-11	Work paper for Clothing Expense Adjustment

United Telephone Association, Inc.  
KUSF Support  
Income Statement Adjustment No. 9  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-1

Line No.	Description	Total Company	Intrastate Separation	Intrastate Adjustment
1	Adjustment to Network Access Revenue (Acct. 5080)	225	1.000000	225
2	Adjustment to Local Network Services Revenue (Acct. 5001)	26,473	1.000000	26,473
3	Adjustment to Kansas Universal Service Support (Acct. 5001)	(75)	1.000000	(75)
4	<b>Staff Adjustment to Kansas Universal Service Fund</b>	<u>\$ 26,623</u>		<u>\$ 26,623</u>
<b>Breakdown of Adjustment:</b>				
<b>Intrastate Access Reduction</b>				
5	Intrastate Access Reduction July 2019 - Year 23		<u>225</u>	
6	<b>Staff Adjustment to Intrastate Network Access Revenue</b>			<u>\$ 225</u>
<b>Local Service Revenue</b>				
7	Annual Local Revenue Decrease Effective March 2019 - Year 23		<u>26,473</u>	
8	<b>Staff Adjustment to Local Service Revenue</b>			<u>\$ 26,473</u>
<b>KUSF</b>				
9	KUSF Support Calculation Worksheet (Issue No. 32)		284,955	
10	United KUSF Balance - Section 9, Schedule 1, Line 3		<u>285,030</u>	
11	<b>Staff Adjustment to KUSF Support</b>			<u>\$ (75)</u>

Sources: United Telephone Association, Inc., Section 9  
KUSF Support Calculation Worksheet, Issue 32 (as of July 1, 2019)

United Telephone Association, Inc.  
Intrastate Access Revenues  
Income Statement Adjustment No. 10  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-2

<b>Line No.</b>	<b>Description</b>	<b>Total Company</b>	<b>Intrastate Separations</b>	<b>Intrastate Adjustment</b>
<b>1</b>	<b>Staff Adjustment to Intrastate Access Revenues (Acct. 5084)</b>	<b><u>\$ 1,075</u></b>	<b>1.000000</b>	<b><u>\$ 1,075</u></b>
	<b><u>Breakdown of Adjustment:</u></b>			
2	Reverse Applicant Intrastate Terminating Revenue Requirement Adjustment (Acct. 5084)	1,075		
<b>3</b>	<b>Staff Adjustment to Intrastate Access Revenues (Acct. 5084)</b>	<b><u>\$ 1,075</u></b>		

Source: United Telephone Association, Inc.'s Application, Section 9, W/P IS 3

United Telephone Association, Inc.  
 Audit Expense  
 Income Statement Adjustment No. 11  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-3

Line No.	Description	Total Company	Intrastate Separations	Intrastate Adjustment
1	Adjustment to General and Administrative - Rate Case Expense (Acct. 6720)	(17,784)	1.000000	(17,784)
2	<b>Staff Adjustment to Audit Expense</b>	<u><u>\$ (17,784)</u></u>		<u><u>\$ (17,784)</u></u>
<b><u>Breakdown of Adjustment</u></b>				
3	United Audit Expense		39,448	
4	KCC Assessable Audit Expense		<u>21,631</u>	
5	Total Audit Expenses		61,079	
6	Amortization Period (Years)		<u>5</u>	
7	Annual Audit Amortization			12,216
8	Less: United Adjustment for Audit Expense			<u>30,000</u>
9	<b>Staff Adjustment to Rate Case Expense (Acct. 6720)</b>			<u><u>\$ (17,784)</u></u>
<b><u>Detail of Audit Expense Calculations</u></b>				
<b><u>Consultant Fees - TCA</u></b>				
10	May 31, 2019		190	
11	June 30, 2019		212	
12	July 31, 2019		9,673	
13	August 31, 2019		12,529	
14	September 30, 2019		3,237	
15	October 31, 2019		<u>6,782</u>	
16	Total TCA Invoices			32,623
<b><u>Legal Fees - Jamison Law</u></b>				
17	June 6, 2019 through November 22, 2019		<u>6,825</u>	
18	Total Jamison Law Invoices			<u>6,825</u>
19	<b>Total United Audit Expense</b>			<u><u>\$ 39,448</u></u>
<b><u>KCC Maximum Assessment Calculation</u></b>				
20	Maximum Assessment for Fiscal Year per Accounting		22,238	
21	Less: Assessments to Date (includes Audit Assessments)		<u>607</u>	
22	Remaining Maximum Assessment for Fiscal Year		21,631	
23	Assessments for Docket to Date (included in Assessments to Date)		<u>-</u>	
24	Maximum Assessment for Docket		21,631	
<b><u>KCC Audit Expenses</u></b>				
25	Staff	23,487		
26	Consultants and Expenses	<u>7,043</u>		
27	Total KCC Audit Expenses		30,530	
28	<b>Total KCC Audit Expense</b>			<u><u>\$ 21,631</u></u>

Sources: United Telephone Association, Inc., Section 9  
 United Telephone Association, Inc. Response to Staff Data Request Nos. 77 and 77 Updated

United Telephone Association, Inc.  
 Property Tax Expense  
 Income Statement Adjustment No. 12  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-4

Line No.	Description	Total Company	Intrastate Separations	Intrastate Adjustment
1	Adjustment to Other Operating Taxes (Acct. 7240)	<u>\$ (7,158)</u>	0.673128	<u>\$ (4,818)</u>
<b><u>Breakdown of Adjustment:</u></b>				
2	Staff Calculated 2018 Property Tax		135,483	
3	Less: 2018 Available Telecom Credit		<u>15,410</u>	
4	Staff Adjusted 2018 Property Tax			120,073
5	Staff Calculated Regulated Percentage			<u>93.78%</u>
6	Staff Adjusted Regulated Property Tax Expense			<u>112,606</u>
7	United Property Tax Expense			<u>119,764</u>
8	Staff Adjustment for Property Taxes			<u>\$ (7,158)</u>

Sources: United Telephone Association, Inc.'s Application, Section 9  
 United Telephone Association, Inc.'s Response to Staff Data Request No. 76  
 Exhibits KLF-4(a) and KLF-4(b)

United Telephone Association, Inc.  
 Detail of 2018 Property Tax Expense  
 Income Statement Adjustment No. 12  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-4(a)

Line No.	County	Statement	Unit	Assessed Value	Levy	2018 Tax
1	Beaver			7,285		408.00
2	Clark	005217	002 Englewood City		212.881	1,326.04
3	Clark	005216	001 Ashland		282.357	12,333.63
4	Clark	005218	006 Appleton		226.299	294.87
5	Clark	005219	007 Appleton		139.829	11.33
6	Clark	005220	008 Appleton		154.666	198.59
7	Clark	005221	010 Appleton		220.564	109.62
8	Clark	005222	013 Center		227.788	3,571.03
9	Clark	005223	017 Lexington		228.358	2,548.25
10	Clark	005224	020 Liberty		151.970	5.93
11	Clark	005225	022 Sitka		227.788	3,211.81
12	Clark	005226	023 Sitka		225.104	23.19
13	Clark	005227	025 Englewood TWP		228.353	3,100.12
14	Finney	023345	001 City		158.868	230.36
15	Finney	023346	010 G 102 PWD		121.258	590.65
16	Finney	023347	015 G 457 PWD		125.085	269.56
17	Finney	023348	085 GC 457 DD2		123.137	84.47
18	Finney	023349	090 GC 457		120.616	129.90
19	Finney	023350	110 P 457		121.795	920.29
20	Finney	023351	120 P 457 DD2		124.316	19.64
21	Finney	023352	125 I 457		120.212	97.49
22	Finney	023353	130 I 363		124.459	1.99
23	Ford	12689	001 City-Dodge City USD 443		183.020	20,304.06
24	Ford	12690	001 City-Dodge City USD 443		183.020	8,921.32
25	Ford	12691	002 City-Dodge City USD 443		185.822	132.50
26	Ford	12692	004 City-Dodge City USD 443		186.233	184.74
27	Ford	12693	008 City-Ford City USD 459		195.737	2,395.04
28	Ford	12694	008 City-Ford City USD 459		195.737	76.74
29	Ford	12695	009 City-Spearville City USD 381		165.457	2,082.78
30	Ford	12696	009 City-Spearville City USD 381		165.457	46.82
31	Ford	12697	015 Twp-Wheatland Twp USD 347		169.261	12.70
32	Ford	12698	016 Twp-Wheatland Twp USD 381		152.862	742.46
33	Ford	12699	016 Twp-Wheatland Twp USD 381		152.862	13.92
34	Ford	12700	020 Twp-Spearville Twp USD 381		144.486	2,895.50
35	Ford	12701	020 Twp-Spearville Twp USD 381		144.486	45.08
36	Ford	12702	021 Twp-Spearville Twp USD 381		147.699	535.12
37	Ford	12703	021 Twp-Spearville Twp USD 381		147.699	30.28
38	Ford	12704	022 Twp-Spearville Twp USD 443		153.380	29.46
39	Ford	12705	023 Twp-Spearville Twp USD 443		150.167	0.45
40	Ford	12706	024 Twp-Spearville Twp USD 459		141.826	522.64
41	Ford	12707	024 Twp-Spearville Twp USD 459		141.826	5.96
42	Ford	12708	031 Twp-Grandview Twp USD 443		149.676	82.02
43	Ford	12709	040 Twp-Royal Twp USD 443		170.824	0.85
44	Ford	12710	050 Twp-Fairview Twp USD 443		156.257	126.10
45	Ford	12711	051 Twp-Fairview Twp USD 443		153.004	82.04
46	Ford	12712	052 Twp-Fairview Twp USD 102		141.379	296.90
47	Ford	12713	060 Twp-Dodge Twp USD 443		162.226	189.16
48	Ford	12714	061 Twp-Dodge Twp USD 443		159.013	164.90
49	Ford	12715	070 Twp-Richland Twp USD 443		156.476	666.90
50	Ford	12716	071 Twp-Richland Twp USD 443		159.278	62.44
51	Ford	12717	081 Twp-Bucklin Twp USD 381		162.060	18.80
52	Ford	12718	083 Twp-Bucklin Twp USD 381		172.434	5.35
53	Ford	12719	084 Twp-Bucklin Twp USD 459		169.774	40.76
54	Ford	12720	084 Twp-Bucklin Twp USD 459		169.774	19.18
55	Ford	12721	086 Twp-Bucklin Twp USD 459		174.585	266.42
56	Ford	12722	090 Twp-Ford Twp USD 443		154.507	1,710.08
57	Ford	12723	090 Twp-Ford Twp USD 443		154.507	37.24
58	Ford	12724	091 Twp-Ford Twp USD 443		169.344	123.62
59	Ford	12725	093 Twp-Ford Twp USD 459		146.166	203.18

United Telephone Association, Inc.  
 Detail of 2018 Property Tax Expense  
 Income Statement Adjustment No. 12  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-4(a)

Line No.	County	Statement	Unit	Assessed Value	Levy	2018 Tax
60	Ford	12726	094 Twp-Ford Twp USD 459		161.003	577.68
61	Ford	12727	094 Twp-Ford Twp USD 459		161.003	5.96
62	Ford	12728	095 Twp-Ford Twp USD 459		165.814	91.54
63	Ford	12729	100 Twp-Enterprise Twp USD 443		155.317	259.38
64	Ford	12730	110 Twp-Concord Twp USD 443		168.229	110.70
65	Ford	12731	111 Twp-Concord Twp USD 102		156.564	171.44
66	Ford	12732	121 Twp-Wilburn Twp USD 102		145.758	16.62
67	Ford	12733	140 Twp-Sodville Twp USD 459		172.214	765.66
68	Ford	12734	140 Twp-Sodville Twp USD 459		172.214	19.64
69	Ford	17808	001 City-Dodge City USD 443		183.020	3.36
70	Ford	17809	001 City-Dodge City USD 443		183.020	668.58
71	Gray	5806	001 City-Cimarron City USD 102		171.425	156.08
72	Gray	5807	001 City-Cimarron City USD 102		171.425	13,086.94
73	Gray	5808	002 City-Copeland City USD 476		156.366	111.88
74	Gray	5809	002 City-Copeland City USD 476		156.366	1,609.36
75	Gray	5810	003 City-Ensign City USD 102		163.608	63.00
76	Gray	5811	003 City-Ensign City USD 102		163.608	1,381.98
77	Gray	5812	004 City-Ingalls City USD 477		170.950	42.48
78	Gray	5813	004 City-Ingalls City USD 477		170.950	3,453.84
79	Gray	5814	005 City-Montezuma City USD 371		156.505	57.22
80	Gray	5815	005 City-Montezuma City USD 371		156.505	4,445.66
81	Gray	5816	010 Twp-Foote Twp USD 102		115.548	45.26
82	Gray	5817	010 Twp-Foote Twp USD 102		115.548	1,909.92
83	Gray	5818	011 Twp-Foote Twp USD 477		125.110	477.46
84	Gray	5819	012 Twp-Foote Twp USD 477		121.877	339.42
85	Gray	5820	013 Twp-Foote Twp USD 102		112.315	7.70
86	Gray	5821	020 Twp-Logan Twp USD 477		125.442	11.42
87	Gray	5822	020 Twp-Logan Twp USD 477		125.442	918.18
88	Gray	5823	021 Twp-Logan Twp USD 477		122.209	5.92
89	Gray	5824	021 Twp-Logan Twp USD 477		122.209	1,288.20
90	Gray	5825	030 Twp-Ingalls Twp USD 477		122.053	59.70
91	Gray	5826	030 Twp-Ingalls Twp USD 477		122.053	3,254.56
92	Gray	5827	031 Twp-Ingalls Twp USD 476		127.626	6.44
93	Gray	5828	031 Twp-Ingalls Twp USD 476		127.626	37.74
94	Gray	5829	032 Twp-Ingalls Twp USD 371		136.746	42.50
95	Gray	5830	040 Twp-Cimarron Twp USD 477		125.338	7.05
96	Gray	5831	040 Twp-Cimarron Twp USD 477		125.338	265.70
97	Gray	5832	041 Twp-Cimarron Twp USD 477		128.571	0.13
98	Gray	5833	042 Twp-Cimarron Twp USD 102		119.009	550.12
99	Gray	5834	043 Twp-Cimarron Twp USD 102		117.276	761.74
100	Gray	5835	044 Twp-Cimarron Twp USD 102		115.776	28.74
101	Gray	5836	044 Twp-Cimarron Twp USD 102		115.776	2,447.04
102	Gray	5837	050 Twp-East Hess Twp USD 102		112.987	31.90
103	Gray	5838	050 Twp-East Hess Twp USD 102		112.987	1,740.76
104	Gray	5839	051 Twp-East Hess Twp USD 371		137.242	8.34
105	Gray	5840	051 Twp-East Hess Twp USD 371		137.242	109.66
106	Gray	5841	052 Twp-East Hess Twp USD 225		136.157	3.19
107	Gray	5842	060 Twp-Montezuma Twp USD 102		116.161	413.84
108	Gray	5843	061 Twp-Montezuma Twp USD 371		140.416	76.54
109	Gray	5844	061 Twp-Montezuma Twp USD 371		140.416	6,128.06
110	Gray	5845	070 Twp-Copeland Twp USD 371		139.360	121.04
111	Gray	5846	071 Twp-Copeland Twp USD 477		124.667	0.86
112	Gray	5847	072 Twp-Copeland Twp USD 476		130.240	35.42
113	Gray	5848	072 Twp-Copeland Twp USD 476		130.240	826.68
114	Harper Oklahoma					2,913.00
115	Haskell	015737	013 Haskell-374-H		173.378	7.28
116	Haskell	015736	007 Lockport-374		127.720	1,074.00
117	Haskell	015735	006 Lockport-476		131.327	2,407.22
118	Hodgemen	21880049	1-Hanston City-227-228		216.687	2,067.64



United Telephone Association, Inc.  
 Detail of 2018 Property Tax Expense  
 Income Statement Adjustment No. 12  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-4(a)

Line No.	County	Statement	Unit	Assessed Value	Levy	2018 Tax
119	Hodgemen	21880050	5-Marena Township-227-228		178.618	2,105.74
120	Hodgemen	21880051	10-Valley Twp-227		190.301	23.80
121	Hodgemen	21880052	11-Valley Twp-227-228		176.377	72.32
122	Hodgemen	21880053	15-North Roscoe Twp-227		188.863	17.20
123	Hodgemen	21880054	20-Benton Twp-227		190.301	42.44
124	Hodgemen	21880055	30-Center Twp-227		190.301	8.76
125	Hodgemen	21880056	31-Center Twp-227-228		176.377	282.56
126	Hodgemen	21880057	35-Sterling Twp-227-228 IWS		174.594	1,086.50
127	Hodgemen	21880058	36-Sterling Twp-227 IWS		188.518	48.84
128	Hodgemen	21880059	37-Sterling Twp-227-228 OWS		171.381	16.46
129	Hodgemen	21880060	39-Sterling Twp-381 IWS		176.148	273.92
130	Hodgemen	21880061	40-Sterling Twp-381 OWS		172.935	25.42
131	Hodgemen	21880062	45-Sawlog Twp-227		190.301	243.98
132	Kiowa	11123	60-04 422 Twp		135.626	29.30
133	Meade	10984	036 Twp-Sand Creek Twp USD 220		153.390	31.60
134	Meade	10976	012 Twp-Crooked Creek Twp USD 371		144.704	22.58
135	Meade	10977	014 Twp-Mertilla Twp USD 483		122.138	7.21
136	Meade	10978	014 Twp-Mertilla Twp USD 483		122.138	121.04
137	Meade	10979	015 Twp-Mertilla Twp USD 226		135.669	1.90
138	Meade	10980	018 Twp-Mertilla Twp USD 371		147.349	17.24
139	Meade	10981	020 Twp-Mertilla Twp USD 476		142.647	6.99
140	Meade	10982	020 Twp-Mertilla Twp USD 476		142.647	422.66
141	Meade	10983	035 Twp-Sand Creek Twp USD 220		137.831	353.54
142	Ness	60170	100-Highpoint Twp-106-WS81		136.116	10.48
143	Pawnee	7859	001 City-Burdett City USD 496		207.377	20.74
144	Pawnee	7860	040 Twp-Browns Grove Twp USD 496		148.062	99.66
<b>145</b>			<b>Total 2018 Property Taxes</b>			<b>\$ 135,482.52</b>

Source: , Inc.'s Responses to Staff Data Request No. 47

United Telephone Association, Inc.  
 Regulated Property Tax Percentage Calculation  
 Income Statement Adjustment No. 12  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-4(b)

Line No.	Account	Description	Balance 12/31/2018	Staff Regulated %	Regulated Balance
1	2111	Land	292,763	63.54%	186,022
2	2112	Motor Vehicles	674,762	54.97%	370,917
3	2112.2	Motor Vehicles Non-Plant	76,215	33.15%	25,265
4	2115	Garage Work Equipment	23,580	54.97%	12,962
5	2116	Other Work Equipment	1,086,425	54.97%	597,208
6	2121	Buildings	2,816,528	63.54%	1,789,622
7	2121.1	Buildings - South Englewood	28,630	63.54%	18,192
8	2122	Furniture	424,797	33.15%	140,820
9	2123.1	Office Support Equipment	90,015	33.15%	29,840
10	2123.2	Company Communications Equipment	100,381	33.15%	33,276
11	2124	General Purpose Computers	<u>3,305,242</u>	33.15%	<u>1,095,688</u>
12		Total General Support Facilities	\$ 8,919,338		\$ 4,299,811
13	2212	Digital Electronic Co Office	890,801	100.00%	890,801
14	2212.1	Central Office Equipment	7,254	100.00%	7,254
15	2232	Carrier & Circuit Equipment	13,966,086	100.00%	13,966,086
16	2232	Carrier & Circuit Equipment 2013	4,331,375	100.00%	4,331,375
17	2232.1	Carrier & Circuit Equipment South Eng	115,642	100.00%	115,642
18	2232.1	Carrier & Circuit Equipment - OK 2013	42,248	100.00%	42,248
19	2232.2	Fiber Connection Equipment	<u>226,024</u>	100.00%	<u>226,024</u>
20		Total Central Office Equipment	\$ 19,579,430		\$ 19,579,430
21	2421	Aerial Cable	26,131	100.00%	26,131
22	2422	Underground Cable	252,171	100.00%	252,171
23	2423	Buried Cable	43,057,640	100.00%	43,057,640
24	2423.1	Buried Cable - South Eng	856,370	100.00%	856,370
25	2431	Aerial Wire	39,042	100.00%	39,042
26	2431	C&W - Map Com	858,487	100.00%	858,487
27	2441	Conduit Systems	694,759	100.00%	694,759
28	2441.1	Conduit Systems South Englewood	<u>1,835</u>	100.00%	<u>1,835</u>
29		Total Cable and Wire Facilities	\$ 45,786,435		\$ 45,786,435
30	2690	Intangibles	1,905	100.00%	1,905
31		Total Plant in Service	<u>\$ 74,287,108</u>		<u>\$ 69,667,581</u>
32		<b>Regulated Percentage</b>			<b>93.78%</b>
33		Non-Regulated Percentage			6.22%

Sources: United Telephone Association, Inc.'s Application, Section 4

United Telephone Association, Inc.  
 Advertising Expense  
 Income Statement Adjustment No. 13  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-5

Line No.	Acct	Description	Staff Adjustment to Advertising	Staff Regulated Percentage	Staff Regulated Advertising Adjustment	Intrastate Separations	Intrastate Adjustment
1	6610	Marketing Expense	(4,082)	100%	(4,082)	0.458347	(1,871)
2	6720	General and Administrative Expense	(6,474)	33.15%	(2,146)	0.541849	(1,163)
3			<u>\$ (10,556)</u>		<u>\$ (6,228)</u>		<u>\$ (3,034)</u>

Line No.	Date	Vendor	Description	6611.000	6613.000	6722.000
4	Jan-18	Ingalls USD #477	Single Hole Sponsor			150.00
5	Jan-18	Cimarron City Library	Chef Alli Women in Ag			100.00
6	Jan-18	Hodgeman Co Conservation District	Annual Meeting Donation			50.00
7	Jan-18	Spare Tyme Bowl	Rake Sweep Advertisement			100.00
8	Jan-18	Embroidme	Deluxe CD Padfolio/Pens			780.97
9	Jan-18	Visa 1120	Monthly Chamber Board Meeting			5.17
10	Jan-18	Great Plains Radio	Radio Advertising		100.00	
11	Feb-18	Boothill Model Railroad Club	Cimarron Model Train			50.00
12	Feb-18	Visa 4596	Candy for Gray Co Career Fair			12.46
13	Feb-18	Great Plains Radio	Radio Advertising		100.00	
14	Feb-18	Primo	Marketing Membership	50.00		
15	Mar-18	Gray County Wrestling	Gray Co Wrestling 5K			100.00
16	Mar-18	Ingalls Alumni Foundation	Donation			100.00
17	Mar-18	Visa 1120	Monthly Chamber Board Meeting			5.37
18	Mar-18	Emblazon Designs	T-Shirts			172.92
19	Mar-18	Great Plains Radio	Radio Advertising		100.00	
20	Mar-18	Primo	Marketing Membership	25.00		
21	Apr-18	Visa 1120	Monthly Chamber Board Meeting			5.17
22	Apr-18	Great Plains Radio	Radio Advertising		100.00	
23	Apr-18	Dodge City Roundup Inc	Arena Sign Advertising		575.00	
24	Apr-18	Primo	Marketing Membership	25.00		
25	Apr-18	Visa 7680	Direct Mail Cards	27.29		
26	May-18	Central Publishing Company	Advertising County Books		140.00	
27	May-18	Kaeser Blair Inc	Stainless Steel Tumbler			1,066.79
28	May-18	Great Plains Radio	Radio Advertising		100.00	
29	May-18	Primo	Marketing Membership	25.00		
30	Jun-18	Cow Festival	Select Sponsorship			250.00
31	Jun-18	Spearville Basketball Camps	Future Lancer Basketball Camp			200.00
32	Jun-18	Basketball Stars	2018 KS Hardwood Heroes Basket			500.00
33	Jun-18	Great Plains Radio	Radio Advertising		100.00	
34	Jun-18	Primo	Marketing Membership	25.00		
35	Jul-18	Hanston Library	Summer Reading Program			50.00
36	Jul-18	Great Plains Radio	Radio Advertising		100.00	
37	Jul-18	Primo	Marketing Membership	25.00		
38	Aug-18	Ingalls Booster Club	Bulldog Gold Booster		175.00	
39	Aug-18	Embroidme	Chairs			670.91
40	Aug-18	Spearville News	Calendar Ad			37.50
41	Aug-18	Great Plains Radio	Radio Advertising		100.00	
42	Aug-18	Primo	Marketing Membership	25.00		
43	Sep-18	South Gray Booster Club	Booster Supporter			45.00
44	Sep-18	Visa 1120	Meals w/Clients			109.33
45	Sep-18	Great Plains Radio	Radio Advertising		100.00	
46	Sep-18	Ingalls Yearbook Staff	Yearbook Advertisement			50.00
47	Sep-18	Primo	Marketing Membership	25.00		
48	Oct-18	Koehn Printing	Calendar			605.99
49	Oct-18	CHR Solutions	Ice Skate Invite			276.47
50	Oct-18	Friends of the Ashland Library Inc	Dinner Theatre Benefit			250.00
51	Oct-18	Great Plains Radio	Radio Advertising		100.00	
52	Oct-18	Primo	Marketing Membership	25.00		
53	Oct-18	Nextech	Fiber Marketing Plan	345.40		
54	Nov-18	Visa 4125	Meals w/Clients			25.00
55	Nov-18	Great Plains Radio	Radio Advertising		100.00	
56	Nov-18	Primo	Marketing Membership	25.00		
57	Nov-18	Nextech	Snap Chat Filter			170.50
58	Nov-18	Nextech	Website Graphic for Fiber	341.00		
59	Nov-18	Nextech	Directory Photo Contest	306.90		
60	Dec-18	Visa 4596	Directory Phone Book Cover	150.00		
61	Dec-18	Cash	Cimarron Chamber Meeting			10.50
62	Dec-18	Great Plains Radio	Radio Advertising		100.00	
63	Dec-18	Primo	Marketing Membership	25.00		
64	Dec-18	Nextech	Customer Postcards			523.60
65	Dec-18	Nextech	Directory Photo Contest	521.40		
66				<u>\$ 1,991.99</u>	<u>\$ 2,090.00</u>	<u>\$ 6,473.65</u>

Source: United Telephone Association, Inc. Response to Staff Data Request Nos. 29 and 115

United Telephone Association, Inc.  
Dues and Donations  
Income Statement Adjustment No. 14  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-6

Line No.	Account	Description	Staff Adjustment to Dues and Donations	Staff Regulated Percentage	Staff Regulated Dues and Donations Adjustment	Intrastate Separations	Intrastate Adjustment
1	6720	General and Administrative Expense	\$ (13,921)	33.15%	\$ (4,615)	0.541849	\$ (2,501)

Line No.	Account	Description	Membership Dues	Additional Fees	Total
<b><u>Organization</u></b>					
2	6722.0000	State Independent Telephone Association of Kansas (SITA)	1,654.70	-	1,654.70
3	6728.1000	Western Telecommunications Alliance (WTA)	1,472.50	250.00	1,722.50
4	6728.1000	NTCA - ILEC Membership	7,826.66	280.00	8,106.66
5			<b>10,953.86</b>	<b>530.00</b>	<b>11,483.86</b>
<b><u>Newspaper Subscriptions</u></b>					
5	6728.1000	Montezuma Press (ILEC Exchange)	-	38.00	38.00
6	6728.1000	Dodge City Daily Globe	-	194.92	194.92
7	6728.1000	Jacksonian (ILEC Exchange)	-	41.00	41.00
8			-	<b>273.92</b>	<b>273.92</b>
<b><u>Chamber Memberships</u></b>					
9	6728.1000	Dodge City Chamber of Commerce	766.31	-	766.31
10	6728.1000	Ashland Chamber of Commerce (ILEC Exchange)	100.00	-	100.00
11	6728.1000	Cimarron Chamber of Commerce (ILEC Exchange)	100.00	-	100.00
12			<b>966.31</b>	-	<b>966.31</b>
<b><u>Other Memberships</u></b>					
13	6723.0000	JJ Keller - Safety & HR (FMLA Revealed)	-	183.00	183.00
14	6723.0000	JJ Keller - Safety & HR (FLSA Esntls)	-	177.24	177.24
15	6723.0000	JJ Keller - Safety & HR (Wage & Hr Comp)	-	48.24	48.24
16	6723.0000	JJ Keller - Safety & HR (Esntls Employment Law)	-	183.84	183.84
17	6723.0000	SHRM - E. Neuschafer (UTA's portion)	-	104.50	104.50
18			-	<b>696.82</b>	<b>696.82</b>
<b><u>Donations</u></b>					
19	6728.1000	Pawnee Hights After Prom	-	100.00	100.00
20	6728.1000	Cimarron After Prom	-	100.00	100.00
21	6728.1000	South Gray High School After Prom	-	100.00	100.00
22	6728.1000	Spearville After Prom	-	100.00	100.00
23	6728.1000	Ashland After Prom	-	100.00	100.00
24			-	<b>500.00</b>	<b>500.00</b>
25					<b>\$ 13,920.91</b>

Sources: United Telephone Association, Inc. Response to Staff Data Request Nos. 31, 32, 69, 99, and 100

United Telephone Association, Inc.  
Lobbying Expense  
Income Statement Adjustment No. 15  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-7

<b>Line No.</b>	<b>Description</b>	<b>Total Company</b>	<b>Intrastate Separations</b>	<b>Intrastate Adjustment</b>
1	Staff Adjustment to General and Administrative Expense (Acct. 6720)	(3,090)	0.541849	(1,674)
2	<b>Total Staff Adjustment to Lobbying Expense</b>	<b>\$ (3,090)</b>		<b>\$ (1,674)</b>

<b><u>Breakdown of Adjustment</u></b>		<b>Amount</b>	<b>Lobbying Percentage</b>	<b>Total Adjustment</b>
Miscellaneous Expense (Acct. 6728.1000)				
3	Western Telecommunications Alliance (WTA)	7,750	81%	6,278
4	NTCA - ILEC Membership	10,870	28%	3,044
5	Total Miscellaneous Expense Adjustment	18,620		9,321
6	Regulated Percentage			33.15%
7	<b>Staff Adjustment to Miscellaneous Expense (Acct. 6728.1000)</b>			<b>\$ 3,090</b>

Sources: United Telephone Association, Inc.'s Response to Staff Data Request No. 31, 33, 99, and 100

United Telephone Association, Inc.  
Miscellaneous Expenses  
Income Statement Adjustment No. 16  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-8

Line No.	Acct	Description	Staff Adjustment to Miscellaneous Expense	Staff Regulated Percentage	Staff Regulated Miscellaneous Expense Adjustment	Intrastate Separations	Intrastate Adjustment
1	6720	General and Administrative Expense	\$ (8,216)	33.15%	\$ (2,723)	0.541849	\$ (1,476)

Line No.	Date	Vendor	Description	6711.1000	6723.0000	6728.1000	6728.2000
2	Nov-18	4AWALKER	Cookies for Retirement			126.00	
3	Nov-18	4C4	2019 Membership Retirement Gift			225.00	
4	Jul-18	4DWERNER	Sheets Cakes for Bob's Retirement			80.00	
5	Nov-18	4DWERNER	3 Sheet Cakes			129.00	
6	Oct-18	4EARTHFIRE	Annual Meeting - Gifts			122.23	
7	Aug-18	4EKOEHN4	Gifts for Annual Meeting			117.50	
8	Mar-18	4FORDCOEXT	Walk Across KS 7 Teams of 6			336.00	
9	Oct-18	4GRANDPA	Annual Meeting - Gifts			150.00	
10	Jan-18	4KKNEDLER1	2017 Christmas Party			232.62	
11	Jan-18	4MESSAGEYO	Christmas Party			120.00	
12	Jan-18	4MESSAGEYO	Massages - After Christmas Party			166.71	
13	Apr-18	FLOWERS	CUST 4208			82.03	
14	Nov-18	FLOWERS	Plant R Schroeder			86.93	
15	May-18	FLOWERSMAI	Arrangement Coast			84.94	
16	Nov-18	FLOWERSMAI	Plant - Tucker Service			68.60	
17	Jan-18	American Express	Gifts - Employee Holiday			1,860.65	
18	Jan-18	Visa 0009	Games & Gifts - Employee Holiday Party			172.64	
19	Jan-18	Visa 4306	Employee Birthday Cards		122.25		
20	Jan-18	Visa 7245	Gifts - Employee Holiday Party			19.39	
21	Jan-18	Visa 9563	Décor - Employee Holiday Party			71.94	
22	Jan-18	Visa 9704	Survey Monkey			29.00	
23	Feb-18	Visa 4306	Wellness Gift Cards - Luke Bunker				155.95
24	Feb-18	Visa 9704	Survey Monkey			29.00	
25	Mar-18	Visa 9704	Survey Monkey			29.00	
26	Apr-18	Visa 9704	Survey Monkey			29.00	
27	May-18	Visa 4306	Plant for Employee (Rodeny) in Hospital			44.40	
28	May-18	Visa 9704	Survey Monkey			29.00	
29	Jun-18	Visa 9704	Survey Monkey			29.00	
30	Jul-18	Visa 2656	Bob Carlson's Retirement Gift			250.00	
31	Jul-18	Visa 2656	Bob Carlson's Retirement			200.31	
32	Jul-18	Visa 3910	Bob's Retirement Party			33.53	
33	Jul-18	Visa 3910	Bob's Retirement Party			17.30	
34	Jul-18	Visa 4306	Flowers for Employee (Death in Family)			107.84	
35	Jul-18	Visa 5389	Josh Bunker Farewell Party			126.88	
36	Jul-18	Visa 9704	Survey Monkey			29.00	
37	Aug-18	Visa 9563	Rosanna's Birthday			54.39	
38	Aug-18	Visa 9704	Survey Monkey			29.00	
39	Sep-18	Visa 1534	BOD - Retirement Plaque	106.50			
40	Sep-18	Visa 5428	Funeral Plant - Employees Parent			116.99	
41	Sep-18	Visa 9704	Survey Monkey			29.00	
42	Oct-18	Visa 9704	Survey Monkey			29.00	
43	Nov-18	Visa 1534	Retirement Party - Guymon Petro			2,143.11	
44	Nov-18	Visa 4306	Customer Gift Cards			50.00	
45	Nov-18	Visa 4596	Christmas Cards			89.18	
46	Nov-18	Visa 4596	Retirement Cards			1.63	
47	Nov-18	Visa 5355	Retirement Party			50.94	
48	Nov-18	Visa 5439	Retirement Mints			17.46	
49	Nov-18	Visa 9704	Survey Monkey			29.00	
50	Dec-18	Visa 0676	Xmas Party			3.90	
51	Dec-18	Visa 4306	Birthday Cards			158.93	
52	Dec-18	Visa 9704	Survey Monkey			29.00	
53	Sep-18	1BEV	Sunflower Wreaths Annual Meeting			50.00	
54	Oct-18	1TINA	Annual Meeting Prize			12.00	
55	Oct-18	1BRENDA	Annual Meeting Prize			50.00	
56				\$ 106.50	\$ 122.25	\$ 8,178.97	\$ 155.95

United Telephone Association, Inc.  
Refreshments  
Income Statement Adjustment No. 17  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-9

Line No.	Acct	Description	Staff Adjustment to Refreshments	Staff Regulated Percentage	Staff Regulated Refreshments Adjustment	Intrastate Separations	Intrastate Adjustment
1	6110	Network Support Expense	(6)	100%	(6)	0.673128	(4)
2	6230	Central Office Transmission Expense	(376)	100%	(376)	0.614686	(231)
3	6410	Cable and Wire Facilities Expense	(513)	100%	(513)	0.698355	(358)
4	6610	Marketing Expense	(34)	100%	(34)	0.458347	(16)
5	6620	Directory Expense	(9)	100%	(9)	0.458347	(4)
6	6710	Executive and Planning Expense	(449)	33.15%	(149)	0.610639	(91)
7	6720	General and Administrative Expense	(14,729)	33.15%	(4,883)	0.541849	(2,646)
8	Total Staff Adjustment to Meals and Refreshments		<u>\$ (16,117)</u>		<u>\$ (5,970)</u>		<u>\$ (3,350)</u>

Sources: Staff Exhibit KLF-9(a)





United Telephone Association, Inc.  
Refreshments  
Income Statement Adjustment No. 17  
Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
Exhibit KLF-9(a)

Line No.	Date	Vendor	Description	6115.0000	6232.0000	6423.0000	6611.0001	6623.1000	6711.1000	6711.1100	6721.0000	6722.0000	6723.0000	6728.1000
63	Jul-18	Dillons Customer Charge	Pop. Water, Plates,Popcorn											585.32
64	Jul-18	VISA	Employee Meal - Plant Operations - Training											144.08
65	Jul-18	VISA	Employee Meal - Locate Training			50.39								
66	Jul-18	VISA	Employee Meeting - Debra & Bev											22.47
67	Aug-18	CRH Coffee Inc	Office Coffee & Supplies											159.72
68	Aug-18	Quill Corporation	Cups for Breakroom											42.36
69	Aug-18	Dillons Customer Charge	Pop, Water, Plates,Popcorn											865.26
70	Aug-18	Artic Glacier	Ice											81.86
71	Aug-18	VISA	Employee Appreciation Meal											38.94
72	Aug-18	VISA	Meal for Employees - Working											33.67
73	Sep-18	CRH Coffee Inc	Office Coffee & Supplies											152.98
74	Sep-18	Daylight Donuts	Donuts											34.41
75	Sep-18	Daylight Donuts	Donuts											34.41
76	Sep-18	Daylight Donuts	Donuts											35.88
77	Sep-18	Daylight Donuts	Donuts											34.41
78	Sep-18	Amazon - Donna's Visa	Foam Cups											48.66
79	Sep-18	Artic Glacier	Ice											98.24
80	Sep-18	Dillons Customer Charge	Pop, Water, Plates, Forks											509.66
81	Sep-18	VISA	Food - Training Day		184.65									
82	Sep-18	VISA	Food - Training Day			27.82								
83	Oct-18	CRH Coffee Inc	Office Coffee & Supplies											172.70
84	Oct-18	Daylight Donuts	Donuts											35.88
85	Oct-18	Daylight Donuts	Donuts											35.88
86	Oct-18	Daylight Donuts	Donuts											35.88
87	Oct-18	Daylight Donuts	Donuts											35.88
88	Oct-18	Bad Habits - Mike's Visa	Meal to setup for Annual Meeting											35.63
89	Oct-18	Dillons Customer Charge	Pop, Water, Plates, Forks											682.65
90	Nov-18	Daylight Donuts	Donuts											35.88
91	Nov-18	Daylight Donuts	Donuts											35.88
92	Nov-18	Daylight Donuts	Donuts											35.88
93	Nov-18	Daylight Donuts	Donuts											35.88
94	Nov-18	CRH Coffee Inc	Office Coffee & Supplies											102.35
95	Nov-18	Cimarron Shurfine - Donella's Visa	Mints for Retirement - Ron, Bev, Donna											7.54
96	Nov-18	Quill Corporation	Paper Cups											135.76
97	Nov-18	Dillons Customer Charge	Pop, Water, Plates, Forks											547.57
98	Nov-18	Wal-mart - Lori's Visa	Punch for retirement party											21.99
99	Nov-18	VISA	Food for Meeting											52.70
100	Nov-18	VISA	Food for Corporate Image											25.00
101	Nov-18	VISA	Food for Employee Meeting											17.57
102	Nov-18	VISA	Food for Employee Meeting											66.25
103	Dec-18	CRH Coffee Inc	Office Coffee & Supplies											142.66
104	Dec-18	Daylight Donuts	Donuts											35.88
105	Dec-18	Daylight Donuts	Donuts											35.88
106	Dec-18	Daylight Donuts	Donuts											35.88
107	Dec-18	Daylight Donuts	Donuts											35.88
108	Dec-18	Central Station - American Express	Board Holiday Dinner						439.48					
109	Dec-18	Prime on the Nine - Randy Visa	Employee Appreciation Meal											44.03
110	Dec-18	Dillons Customer Charge	Pop, Water, Plates, Forks											403.73
111	Dec-18	Dillons Customer Charge	Pop, Water, Plates, Forks											433.52
112	Dec-18	VISA	Food for Meeting				34.19							
113	Dec-18	VISA	Food for Inventory											16.11
114	Dec-18	VISA	Food for Utility Lunch											95.23
115	Dec-18	VISA	Food for Meeting		35.04									
116	Dec-18	VISA	Food for Meeting											44.03
117				\$ 6.35	\$ 376.46	\$ 512.57	\$ 34.19	\$ 9.44	\$ 439.48	\$ 9.44	\$ 18.90	\$ 158.66	\$ 9.44	\$ 14,541.90

Sources: United Telephone Association, Inc. Response to Staff Data Request Nos. 69, 103, 105, and 107

United Telephone Association, Inc.  
 Fitness Memberships  
 Income Statement Adjustment No. 18  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-10

Line No.	Acct	Description	Staff Adjustment to Fitness Memberships	Staff Regulated Percentage	Staff Regulated Fitness Memberships Adjustment	Intrastate Separations	Intrastate Adjustment
1	6720	General and Administrative Expense	\$ (1,860)	33.15%	\$ (617)	0.541849	\$ (334)

Line No.	Date	Vendor	Description	Account No. 6728.1000
2	Sep-18	1TODD TODD SCHRINER	1/2 SEPT FITNESS MEMBERSHIP	26.16
3	Sep-18	1JONATHAN JONATHAN RIVAS	1/2 FITNESS MEMBERSHIP AUG-SEP	30.62
4	Sep-18	1TODD TODD SCHRINER	1/2 AUG FITNESS MEMBERSHIP	25.84
5	Sep-18	1KATE KATE LOCK	1/2 FITNESS MEMBERSHIP SEPT	42.50
6	Sep-18	1KIM KIM THEIS	1/2 FITNESS MEMBERSHIP SEPT	50.00
7	Sep-18	1RANDYR RANDY RIEKENBERG	1/2 FITNESS MEMBERSHIP SEPT	32.50
8	Oct-18	1RANDYR RANDY RIEKENBERG	1/2 FITNESS MEMBERSHIP OCT	32.50
9	Oct-18	1KIM KIM THEIS	1/2 FITNESS MEMBERSHIP OCT	50.00
10	Oct-18	1KATE KATE LOCK	1/2 OCT FITNESS MEMBERSHIP	42.50
11	Oct-18	1TODD TODD SCHRINER	1/2 OCT FITNESS MEMBERSHIP	26.16
12	Nov-18	1ASHLEY ASHLEY LEDFORD	1/2 FITNESS MEMBERSHIP MAR-OCT	297.50
13	Nov-18	1TODD TODD SCHRINER	1/2 FITNESS MEMBERSHIP NOV	26.16
14	Nov-18	1JUAN JUAN MARTINEZ	1/2 FITNESS MEMBERSHIP NOV	29.23
15	Nov-18	1JONATHAN JONATHAN RIVAS	1/2 FITNESS MEMBERSHIP OCT-NOV	34.44
16	Nov-18	1RANDYR RANDY RIEKENBERG	1/2 FITNESS MEMBERSHIP NOV	65.00
17	Nov-18	1JONATHAN JONATHAN RIVAS	1/2 FITNESS MEMBERSHIP OCT-NOV	30.62
18	Nov-18	1KIM KIM THEIS	1/2 FITNESS MEMBERSHIP NOV	50.00
19	Nov-18	1ROSANNA ROSANNA MELENDEZ	1/2 FITNESS MEMBERSHIP NOV	37.50
20	Nov-18	1KATE KATE LOCK	1/2 NOV FITNESS MEMBERSHIP	42.50
21	Dec-18	1JONATHAN JONATHAN RIVAS	1/2 FITNESS MEMBERSHIP DEC	15.31
22	Dec-18	1JUAN JUAN MARTINEZ	1/2 FITNESS MEMBERSHIP DEC	21.73
23	Dec-18	1TODD TODD SCHRINER	1/2 FITNESS MEMBERSHIP DEC	26.16
24	Dec-18	1RANDYR RANDY RIEKENBERG	1/2 FITNESS MEMBERSHIP DEC	65.00
25	Dec-18	1KATE KATE LOCK	1/2 DEC FITNESS MEMBERSHIP	42.50
26	Dec-18	1ADRIANA ADRIANA GARCIA	1/2 FITNESS MEMBERSHIP JAN-DEC	605.00
27	Dec-18	1ANGELICA ANGELICA MIRANDA	1/2 FITNESS MEMBERSHIP DEC	27.50
28	Dec-18	1ASHLEY ASHLEY LEDFORD	1/2 FITNESS MEMBERSHIP NOV-DEC	85.00
29				<u>\$ 1,859.93</u>

Sources: United Telephone Association, Inc. Response to Staff Data Request Nos. 69, 98, and 115

United Telephone Association, Inc.  
 Clothing Allowance  
 Income Statement Adjustment No. 19  
 Test Year Ending December 31, 2018

Docket No. 20-UTAT-032-KSF  
 Exhibit KLF-11

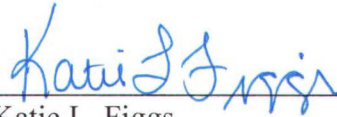
Line No.	Description	Account	Staff Adjustment to Clothing Allowance	Staff Regulated Percentage	Staff Regulated Clothing Allowance Adjustment	Intrastate Separations	Intrastate Adjustment
1	General and Administrative Expense	6720	\$ (20,464)	33.15%	\$ (6,784)	0.541849	\$ (3,676)
<b>Breakdown of Staff's Clothing Expense Calculation</b>					<b>Amount</b>	<b>Total</b>	
2	Lands' End Business Shirt				31.30		
3	Logo Embroidery				7.00		
4	<b>Total Expense per Shirt</b>					<b>38.30</b>	
5	Number of Employees				76		
6	Number of Shirts per Employee				3		
7	<b>Staff's Total Clothing Expense</b>					<b>8,732.40</b>	
8	<b>United's Test Year Clothing Allowance Expense</b>					<b>29,196.74</b>	
9	<b>Staff's Adjustment to Clothing Allowance Expense</b>					<b>(20,464.34)</b>	

Sources: United Telephone Association, Inc. Response to Staff Data Request Nos. 96 and 97

VERIFICATION

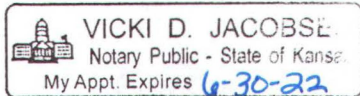
STATE OF KANSAS                    )  
  ) ss.  
COUNTY OF SHAWNEE            )

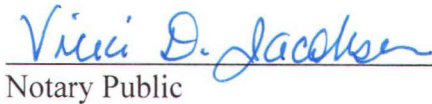
Katie L. Figgs, being duly sworn upon her oath deposes and states that she is the Senior Auditor for the Utilities Division of the State Corporation Commission of the State of Kansas; that she has read and is familiar with the foregoing *Testimony in Support of Settlement*, and that the statements contained therein are true and correct to the best of her knowledge, information and belief.



\_\_\_\_\_  
Katie L. Figgs  
Senior Auditor, Utilities Division  
Kansas Corporation Commission  
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 13<sup>th</sup> day of December, 2019.



  
\_\_\_\_\_  
Notary Public

My Appointment Expires: 06-30-22

**CERTIFICATE OF SERVICE**

20-UTAT-032-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Direct Testimony was served via electronic service this 13th day of December, 2019, to the following:

COLLEEN JAMISON  
JAMISON LAW, LLC  
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colleen.jamison@jamisonlaw.legal

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/s/ Vicki Jacobsen  
Vicki Jacobsen