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June 28, 2018

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

RE: Docket 18-GIMT-394-GIT  
Section 254(e) certifications

Dear Ms. Retz:

On behalf of Blue Valley Telecommunications, Inc., attached please find for filing in Docket No. 18-GIMT-394-GIT the 254(e) certifications required by the Commission to be filed in this docket by July 2, 2018.

In this filing, Attachment 2a, lines 240, 245, and 255 as well as the entirety of Attachment 4 has 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. As always, if you have any questions, please do not hesitate to contact me.

Cordially yours,



Colleen R. Jamison

cc: Candace Wright

Encl.

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Chair Shari Feist Albrecht  
Commissioner Jay Scott Emler  
Commissioner Pat Apple

In the Matter of Certification of Compliance )  
with Section 254(e) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 18-GIMT-394-GIT  
Certification of Appropriate Use of Kansas )  
Universal Service Fund Support. )

**SECTION 254(e) CERTIFICATION**  
**FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT**  
**FCC Docket Reference: CC Docket No. 96-45**  
**and KANSAS UNIVERSAL SERVICE FUND SUPPORT**  
(Please type or print legibly)  
(Circle all appropriate support received)

1. My title is CEO/General Manager of Blue Valley Telecommunications, Inc. In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), Connect America Fund (CAF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding Blue Valley Telecommunications, Inc. to the statements made in this certification.

2. Blue Valley Telecommunications, Inc. was named as an eligible telecommunications carrier 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 the USF, CAF and/or KUSF received by Blue Valley Telecommunications, Inc. was used in the proceeding calendar year 2017 and will be used in the new calendar year 2019 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

**Attachment 1**

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

Candace Wright  
Printed/Typed Name

Executed on 6/15/2018 date.

Email address: cwright@bluevalleyinc.net

Company Name: Blue Valley TelecommunicationsDATA YEAR: 2017

	LINE	REGULATED AMOUNT
<b>WORKING LOOPS</b>		
1. Total Loops	(060)	3,360
2. Category 1.3 Loops	(070)	3,338
<b>INVESTMENT</b>		
1. Plant Accounts		
a. Acct 2001	(160)	56,096,881
2. Selected Plant Accounts		
a. Acct 2210	(230)	807,726
b. Acct 2220	(235)	0
c. Acct 2230	(240)	
d. Total Central Office Equip	(245)	
e. Circuit Equip Cat 4.13	(250)	4,292,177
f. Acct 2410	(255)	
<b>AMORTIZABLE TANGIBLE ASSETS</b>		
Acct. 2680 Tot Assets	(800)	0
Acct. 2680 (2230) COE Trans	(805)	0
Acct. 2680 (Cat. 4.13) COE Trans	(810)	0
Acct. 2680 (2410) Total CWF	(815)	0
Acct. 2680 (2410) CWF-Cat 1	(820)	0
Acct. 6560 (2680) Dep & Amort	(830)	0
<b>PART 36 - COST STUDY DATA</b>		
1. Cost Study Avg C&WF Acct 2410	(700)	40,600,873
2. Cost Study Avg C&WF Cat 1	(710)	39,079,635
3. C&WF CAT 1 Factor		0.962532
4. COE CAT 4.13 Factor		0.496957
5. Switching Factor		1.000000

Company Name: Blue Valley Telecommunications

DATA YEAR: 2017

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

INVESTMENT, EXPENSE AND TAXES	LINE	REGULATED AMOUNT
1. Selected Plant Accounts		
a. Acct 2230	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110	(335)	2,807
b. Acct 6110 (benefits)	(340)	0
c. Acct 6110 (rents)	(345)	0
d. Acct 6120	(350)	353,546
e. Acct 6120 (benefits)	(355)	93,669
f. Acct 6120 (rents)	(360)	0
g. Acct 6210	(365)	336,653
h. Acct 6210 (benefits)	(370)	40,351
i. Acct 6210 (rents)	(375)	0
j. Acct 6220	(380)	0
k. Acct 6220 (benefits)	(385)	0
l. Acct 6220 (rents)	(390)	0
m. Acct 6230	(395)	1,159,459
n. Acct 6230 (benefits)	(400)	308,911
o. Acct 6230 (rents)	(405)	0
p. (sum of lines 365+380+395)	(410)	1,496,112
q. Acct 6410	(430)	828,980
r. Acct 6410 (benefits)	(435)	230,432
s. Acct 6410 (rents)	(440)	0
t. Total Expenses Accts. 6110 - 6410	(445)	\$ 2,681,445
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	128,719
b. Acct 6530 (benefits)	(455)	72
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210)	(510)	19,214
b. Acct 6560 (#2220)	(515)	0
c. Acct 6560 (#2230)	(520)	786,040
d. Acct 6560 (#2210-2230)	(525)	\$ 805,254
e. Acct 6560 (#2410)	(530)	1,716,849
5. Corporate Operating Expenses		
a. Acct 6710	(535)	499,691
b. Acct 6710 (benefits)	(540)	173,121
c. Acct 6720	(550)	1,390,931
d. Acct 6720 (benefits)	(555)	315,578
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ 1,890,622
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	1,388,018
b. Rents Portion	(610)	0
Sum of All Expenses (Excluding Depreciation)		\$ 4,700,786
7. Taxes		
a. Acct 7200	(650)	251,168

Company Name: Blue Valley TelecommunicationsDATA YEAR: **2017**

## Test for use of FUSF &amp; KUSF

## CAPITAL:

1. Category 1 C&WF	11,653
2. Category 4.13 COE and Switching	255,150

## MAINTENANCE:

3. CWF - MAINT. EXP.	576,122
4. COE - MAINT. SW	296,302
5. COE - MAINT-OP SYSTEM	-
6. COE - MAINT. - TRANS.	466,294
7. CWF - NETWORK SUPPORT	1,955
8. COE - NETWORK SUPPORT	255
9. CWF GENERAL SUPPORT	181,042
10. COE GENERAL SUPPORT	23,626
20. CWF NETWORK OPERATION	89,621
21. COE NETWORK OPERATION	11,696
22. CWF EXEC. & PLANNING	227,504
23. COE EXEC. & PLANNING	29,689
24. CWF GENERAL ADMIN.	749,140
25. COE GENERAL ADMIN.	97,763
26. CWF OPERATING TAXES	174,975
27. COE OPERATING TAXES	22,834
28. CWF BENEFITS - TTL OPER EXP	966,956
29. COE BENEFITS - TTL OPER EXP	126,188
30. CWF RENTS - TTL OPER EXP	0
31. COE RENTS - TTL OPER EXP	0



Company Name: <u>Blue Valley Telecommunications</u>	
DATA YEAR: <u>2017</u>	
A. Total Cash Expenditures Associated with USF	4,308,765
<b>B. Certified Federal USF Receipts:</b>	
B1. High Cost Loop Support / Frozen High Cost Support	2,343,417
B2. Safety Net Support	-
B3. Broadband Loop Support	-
B4. Safety Valve Support for acquired Exch.	434,856
B5. Connect America Cost Model	-
B6. Alternative Connect America Model	-
B7. CAF ICC (§§ 51.915, 51.917, 51.304)	-
B8. Total Certified Federal USF Receipts	<u>\$ 2,778,273</u>
C. KUSF Receipts	674,679
D. Total FUSF and KUSF Receipts	3,452,952
E. Do Expenditures Exceed FUSF Receipts?	<b>Yes</b>
Amount Expenditures Exceed Certified FUSF (negative number means FUSF exceeds Expenditures)	\$ 1,530,492.35 [A - B8]
F. Do Expenditures Exceed FUSF & KUSF Receipts?	<b>Yes</b>
Amount Expenditures Exceed Certified FUSF and/or KUSF (negative number means FUSF/KUSF exceeds Expenditures)	855,813 [A - D]
Please provide the following information:	
Contact:	<u>Daniel Meszler</u>
Title:	<u>Senior Regulatory Consultant</u>
Phone No.:	<u>719-266-4334</u>
E-Mail:	<u>dmeszler@tcatel.com</u>

**18-GIMT-394-GIT**  
**Attachment 4**

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

Data Year: 2017

NOTES:

E-Mail: [dmeszler@tcatel.com](mailto:dmeszler@tcatel.com)



**18-GIMT-394-GIT**  
**Attachment 4**

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

Supplemental  
PagesPage 2

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

1. All ETCs must provide detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 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 CFR 4.5(e).

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected
None					

(If necessary, please provide additional pages.)

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.

None

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

None

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 CEO/General Manager of the Blue Valley Telecommunications, Inc. 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 Blue Valley Telecommunications, Inc. to the statements made in this certification.

2. By this affidavit, I certify that Blue Valley Telecommunications, Inc. 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 July 1, 2018.

  
\_\_\_\_\_  
Signature

Candace Wright

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 \_\_\_\_\_ of the \_\_\_\_\_  
(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 \_\_\_\_\_(Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_(Company/ Cooperative) 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 \_\_\_\_\_(date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print / Typed Name


5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is CEO/General Manager of the Blue Valley Telecommunications Inc. 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 Blue Valley Telecommunications, Inc. to the statements made in this certification.

2. By this affidavit, I certify that Blue Valley Telecommunications, Inc. 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 July 1, 2018.

  
Signature

Candace Wright

Printed / Typed Name

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

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
See Attachment			

(If necessary, please attach additional pages.)

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

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

1. My title is \_\_\_\_\_ of the \_\_\_\_\_  
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_ (date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed/Typed Name

47 U.S.C. 214(e)(1)(B) requires an ETC to advertise its services throughout the service area for which it has designated "using media of general distribution."

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Marshall County Plat Maps	Plat Book	Marshall County, KS	All of 2017
Nemaha County Plat Maps	Plat Book	Nemaha County, KS	All of 2017
Pottawatomie County Plat Maps	Plat Book	Pottawatomie County, KS	All of 2017
Washington County Plat Maps	Plat Book	Washington County, KS	All of 2017
Flood Communications	Radio	Northeast - Northcentral Kansas	All of 2017
KCLY	Radio	Northeast - Northcentral Kansas	All of 2017
KNZA	Radio	Northeast Kansas	All of 2017
KNDY	Radio	Northeast Kansas	All of 2017
Centralia High School Yearbook	Yearbook	Centralia & Vermillion, KS	All of 2017
Linn High School Yearbook	Yearbook	Linn & Palmer, KS	All of 2017
Marysville High School Yearbook	Yearbook	Beattie, Home, Marysville, & Oketo, KS	All of 2017
Onaga High School Yearbook	Yearbook	Onaga, Westmoreland & Wheaton, KS	All of 2017
Valley Heights High School Yearbook	Yearbook	Blue Rapids & Waterville, KS	All of 2017
Washington County High School Yearbook	Yearbook	Washington County, KS	All of 2017
Rock Creek High School Athletic Program	Program	Westmoreland, KS	2017 School Year
Thomas Signs	Billboards	Northeast Kansas	All of 2017
Kanzaland Phone Book	Directory	Northeast - Northcentral Kansas	All of 2017
Kanzaland Phone Book - Yellow Pages	Directory	Northeast - Northcentral Kansas	All of 2017
<a href="http://www.bluevalley.net">www.bluevalley.net</a>	Website & Web Banners	Northeast Kansas	All of 2017
<a href="http://www.marysvilleonline.net">www.marysvilleonline.net</a>	Website & Web Banners	Northeast Kansas	All of 2017
<a href="http://www.northeastkansassports.com">www.northeastkansassports.com</a>	Website & Web Banners	Northeast Kansas	All of 2017
Brochures/Direct Mail Pieces	Marketing Collateral	Marshall, Nemaha, Pottawatomie & Washington Counties, KS	All of 2017
Blue Valley Print Newsletter	Marketing Collateral	Marshall, Nemaha, Pottawatomie & Washington Counties, KS	All of 2017
Blue Valley eNewsletter	Marketing Collateral	Marshall, Nemaha, Pottawatomie & Washington Counties, KS	All of 2017
Blue Valley Bill Inserts	Marketing Collateral	Marshall, Nemaha, Pottawatomie & Washington Counties, KS	All of 2017
Blue Valley Water Bottle Program	Marketing Collateral	Marshall, Nemaha, Pottawatomie & Washington Counties, KS	All of 2017
Kansas Living Magazine	Magazine	Kansas	All of 2017
KNZA Fair Edition	Newspaper	Northeast Kansas	Summer 2017
Frankfort Area News	Newspaper	Frankfort & Vermillion, KS	All of 2017
Hanover News	Newspaper	Hanover, KS	All of 2017
Linn-Palmer Record	Newspaper	Linn & Palmer, KS	All of 2017
Marysville Advocate	Newspaper	Marshall County, KS	All of 2017
Onaga Herald	Newspaper	Onaga & Wheaton, KS	All of 2017
The Courier-Tribune	Newspaper	Nemaha County, KS	All of 2017
The Telegraph	Newspaper	Blue Rapids & Waterville, KS	All of 2017
Washington County News	Newspaper	Washington County, KS	All of 2017



47 U.S.C. 214(e)(1)(B) requires an ETC to advertise its services throughout the service area for which it has designated "using media of general distribution."

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Westy Official Weekly	Newspaper	Westmoreland, KS	All of 2017
Facebook	Social Media	Nationwide	All of 2017