

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

**In the Matter of An Investigation to Determine)
the Affordable Local Service Rates for Rate-)
of-Return Regulated Carriers and the Annual) Docket No. 25-GIMT-141-GIT
Assessment Rate for the Twenty- Ninth Year)
of the Kansas Universal Service Fund,)
Effective March 1, 2025.)**

**VERIZON’S MOTION FOR APPROVAL
OF INTRASTATE ALLOCATION METHODOLOGY**

Cellco Partnership, Topeka Cellular Telephone Company, Inc., Alltel Corporation, Visible Service LLC, and Verizon Value, Inc. (f/k/a TracFone Wireless, Inc.)¹ (together, “Verizon”) respectfully move the Commission for an order approving their use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund (“KUSF”).

1. In support hereof, Verizon files the accompanying affidavit of Stephen Prew, Vice President - Taxes.
2. As explained in more detail in Stephen Prew’s affidavit, Verizon utilizes a company-specific traffic report that relies on actual minutes of use (“MOU”) data for both Federal Universal Service Fund (“FUSF”) purposes and KUSF purposes, using the inverse of the federal percentage derived from the report to determine the appropriate percentage for KUSF reporting and remittance purposes.
3. Verizon has been using this approach since 2009 for Cellco Partnership, Topeka Cellular Telephone Company, Inc., and Alltel Corporation, and since 2018 for Visible Service

¹ Please note that effective March 14, 2025 Tracfone Wireless, Inc. changed its name to Verizon Value, Inc. All other company information, including its regulatory contacts, stayed the same.

LLC, and since 2012 for Verizon Value, Inc. (f/k/a TracFone Wireless, Inc.). Verizon last updated its Kansas traffic factor in 2024.²

4. Because the traffic report contains actual MOU data that is proprietary and confidential and constitutes a trade secret, the factors developed using that data are being filed as confidential and under seal.

WHEREFORE, Verizon respectfully requests that the Commission enter an order approving Cellco Partnership's, Topeka Cellular Telephone Company, Inc.'s, Alltel Corporation's, Visible Service LLC's and Verizon Value, Inc.'s company-specific traffic report and using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as is just and proper.

Dated: April 16, 2025

Respectfully submitted,

/s/ David E. Bengtson

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² Cellco Partnership, Topeka Cellular Telephone Company, Inc., Alltel Corporation, Visible Service LLC and TracFone Wireless, Inc. filed their last update on April 23, 2024 in Docket 24-GIMT-229-GIT and the Commission approved it by Order dated May 2, 2024.


VERIFICATION

I, Stephen Prew, being of lawful age and duly sworn, state that I have read the above and foregoing Motion and verify that the statements contained therein are true and correct to the best of my knowledge and belief.



Stephen Prew

Subscribed and sworn to before me this 1 day of April, 2025.



Notary Public

My Commission Expires:



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Verizon's Motion for Approval of Intrastate Allocation Methodology was served via electronic mail this 16th day of April, 2025, to the parties appearing on the Commission's service list for Docket No. 25-GIMT-141-GIT:

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/s/ David E. Bengtson
David E. Bengtson

EXHIBIT “A”

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OF THE STATE OF KANSAS**

In the Matter of An Investigation to Determine)	
the Affordable Local Service Rates for Rate-)	
of-Return Regulated Carriers and the Annual)	Docket No. 25-GIMT-141-GIT
Assessment Rate for the Twenty-Ninth Year of)	
the Kansas Universal Service Fund, Effective)	
March 1, 2025.)	

STATE OF NEW JERSEY)	
)	
COUNTY OF SOMERSET)	

**AFFIDAVIT OF STEPHEN PREW
ON BEHALF OF VERIZON**

I, Stephen Prew, being of lawful age and duly sworn, state as follows:

1. I am employed by Verizon as Vice President - Taxes. In this capacity, I am responsible for, *inter alia*, reporting and remittances relating to the Kansas Universal Service Fund ("KUSF") for Cellco Partnership, Topeka Cellular Telephone Company, Inc., Alltel Corporation, Visible Service LLC, and Verizon Value, Inc. (f/k/a TracFone Wireless, Inc.) (together, "Verizon").
2. Verizon's allocation methodology for KUSF purposes is based on a company-specific traffic report. Verizon's company-specific traffic report is used for both Federal Universal Service Fund ("FUSF") and KUSF purposes. The traffic report is based on actual call origination and termination minutes of use ("MOU") data obtained from Verizon's call detail records, and, for Verizon Value, Inc. (f/k/a TracFone Wireless, Inc.), call data provided by other carriers. The MOU are classified as interstate, intrastate or international. Verizon derives the percentage of interstate/international MOU by dividing the number of interstate and international

MOU into total MOU. This percentage is accepted by the Federal Communications Commission for FUSF reporting purposes.

3. Verizon uses the inverse of the federal percentage derived therewith to calculate the percentage for KUSF reporting purposes ($100\% - \text{FUSF \%} = \text{KUSF \%}$). This approach provides a fair and balanced symmetry between federal and state USF programs, and complies with the Commission's directive that carriers use the same allocation methodology for FUSF and KUSF purposes.

4. Verizon applies the KUSF percentage to its Kansas retail revenues to determine the amount it remits to the KUSF.

5. Cellco Partnership, Topeka Cellular Telephone Company, Inc., Alltel Corporation, and Visible Service LLC have used, and continue to use, the same methodology previously disclosed to the Commission.

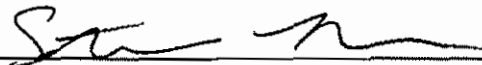
6. TracFone Wireless, Inc. – now Verizon Value, Inc. has used, and continues to use, the same methodology previously disclosed to the Commission.

7. Beginning in April of 2023, Visible Service LLC will use the same methodology as described herein and previously disclosed, however it will be using a Visible-specific traffic report.

8. The intrastate factors used by Verizon for KUSF purposes for the KUSF reporting period from March 2012 through the present are set forth on the confidential and proprietary attachment to my affidavit.

9. Because the intrastate factors are derived from proprietary and confidential trade secret actual MOU data, the attachment to my affidavit is being filed under seal.

Pursuant to Kan. Stat. Ann. 53-601, I certify that the foregoing is true and correct to the best of my knowledge.


Stephen Prew

Subscribed and sworn to before me this 7 day of April, 2025.


Notary Public

My Commission Expires:



Attachment to Stephen Prew's Affidavit

Verizon Proprietary and Confidential Data**Active Entities****Cellco Partnership, Topeka Cellular Telephone Company, Inc., and Alltel Corporation**

KS SUSF Revenue Filing Period	Intrastate Factor
03/2012 to 03/2013	
04/2013 to 03/2014	
04/2014 to 03/2015	
04/2015 to 03/2016	
04/2016 to 03/2017	
04/2017 to 03/2018	
04/2018 to 03/2019	
04/2019 to 03/2020	
04/2020 TO 03/2021	
04/2021 to 03/2022	
04/2022 to 03/2023	
04/2023 to 03/2024	
04/2024 to 3/2025	
04/2025 forward	

Visible Service LLC

KS SUSF Revenue Filing Period	Intrastate Factor
04/2018 to 03/2019	
04/2019 to 03/2020	
04/2020 TO 03/2021	
04/2021 to 03/2022	
04/2022 to 03/2023	
04/2023 Tto 03/2024	
04/2024 to 3/2025	
04/2025 forward	

Tracfone Wireless, Inc.

KS SUSF Revenue Filing Period	Intrastate Factor
03/2012 to 03/2013	
04/2013 to 03/2014	
04/2014 to 03/2015	
04/2015 to 03/2016	
04/2016 to 03/2017	
04/2017 to 03/2018	
04/2018 to 03/2019	
04/2019 to 03/2020	
04/2020 to 03/2021	
04/2021 to 03/2022	
04/2022 to 03/2023	
04/2023 to 03/2024	
04/2024 to 3/2025	
04/2025 forward	