

JAN 7 1994  
STATE OF KANSAS  
NOTARY PUBLIC

CM-GM-T-082 DRS  
DOCKET NO. 18-45-10-100-100  
STATE CORPORATION COMMISSION

JAN 13 1994  
UTILITIES DIVISION  
3-201-1-2-7

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of a Common  
Depreciation Schedule for  
Small Independent Telephone  
Companies in Kansas.

PETITION FOR RECONSIDERATION  
Petitions the  
COMES NOW, Blue Valley, et al, and petitions in the  
Commission to reconsider parts of its order as issued in the  
above-captioned docket on December 21, 1993, and in support  
thereof states the following:

1. While the Commission and its staff are commended for their time and effort in establishing a streamlined process for small companies who seek to submit proposed areas of the State of Kansas that on error sparsely populated areas, it is our belief that an error determine depreciation rates, it is our belief that an error was made by staff in using old historical depreciation rates to arrive at a range of rates for today's environment. Present circumstances of regulations, competition and rapid technological explosion strip away the antiquated methodology for establishing depreciation rates. Computer based equipment, no longer have a long stable life of switching equipment, no longer have the latest available technology service. Consumer demand for the latest available depreciation prevents hardware life alone to be used for depreciation rates.
3. We would ask the Commission to reconsider its order in this docket along the lines suggested in Blue Valley, et

VERIFICATION

STATE OF KANSAS } ss.  
COUNTY OF SHARPEE }

J. M. Connelly, of lawful age, being duly sworn according to law, upon his/her oath, deposes and says:

I am the District Manager-Rate Administration and Industry Relations and as such have read the above information and this petition and verify to the best of my knowledge, information and belief.

J. M. Connelly  
J. M. Connelly  
7 day of January,

BELINDA JOYCE WILSON  
Notary Public - in Kansas  
My Exp. Expires 11/45

Subscribed and sworn to before me this 7 day of January, 1994.

My appointment Expires: January 26, 1995  
of the above Petition of  
this 7 day of  
Chartered  
Thomas E. Gleason, Notary Public  
410 S. 9th N. Suite 410  
Ottawa, KS

CERTIFICATE OF SERVICE  
I hereby certify that a copy was mailed this 7 day of January, 1994, to the following:  
Martha Cooper Counsel  
Southwestern Bell Telephone Commission  
Kansas City, Missouri  
James M. Caplinger, Esq.  
831 Tenth Street 66612  
Topeka, Kansas

Michael G. Smith  
Notary Public

al's comments. We suggested a two-tier system for determining the range for depreciation. The first should cover the more stable assets as used by staff. The second should apply to the technological sensitive assets, of computer based equipment such as digital switching.

4. Also, because of the rapid obsolescence of analog and electromechanical switching brought on by the digital technology, the depreciation rates for these accounts should be elevated.

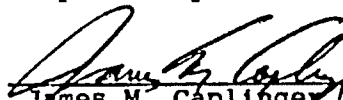
5. We respectfully ask the Commission to reconsider its order and raise the upper level of depreciation rates for technology driven accounts as follows:

<u>Account</u>	<u>Present Upper Rate</u>	<u>Proposed Rate</u>
2124 Gen. Purpose Computer	14.30	20.00
2211 Analog Switch	9.92	15.00
2212 Digital Switch	7.72	10.00
2215 Electro Switch	9.34	10.00

6. The above requested rates will more accurately reflect a recovery rate necessary in today's environment.

WHEREFORE, we respectfully request the Commission to reconsider its order in this docket and raise the upper limit on the depreciation rates of those accounts affected by the rapid advances in technology.

Respectfully submitted,

  
James M. Caplinger  
Supreme Court #04738  
JAMES M. CAPLINGER, CHARTERED  
823 West Tenth  
Topeka, Kansas 66612  
(913) 232-0495

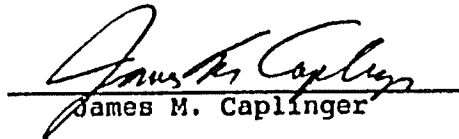
CERTIFICATE OF MAILING

I hereby certify that copies of the foregoing Petition for Reconsideration were placed in the United States mail, first class postage prepaid, this 7th day of January, 1994 to:

Martha Cooper  
Asst. General Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604

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PO Box N  
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Attorney for Columbus, et al

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James M. Caplinger