

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

In the Matter of the Audit of USCOC of)
Nebraska/Kansas LLC by the Kansas)
Universal Service Fund (KUSF) Administrator) Docket No. 24-USCZ-106-KSF
Pursuant to K.S.A. 66-2010(b) for KUSF)
Operating Year 26, Fiscal Year March 2022-)
February 2023.)

**RESPONSE TO PETITION FOR RECONSIDERATION OF
ORDER ADOPTING AUDIT REPORT**

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively) in response to the Petition for Reconsideration filed by USCOC of Nebraska/Kansas LLC (“USCOC”) and states as follows:

1. On August 15, 2023, the Commission directed Vantage Point Solutions (VPS) to perform an audit of USCOC of Nebraska/Kansas LLC (USCOC) for Kansas Universal Service Fund (KUSF) purposes.

2. On April 25, 2024, VPS filed its Audit Report for USCOC regarding Operating Year 26 (March 2022–February 2023) which recommended, among other recommendations, the commission require USCOC issue one-time billing credits in the amount of \$2,236.20 to its affected customers, on a pro-rata basis; update its billing system to exclude KUSF surcharge collection from international calling usage revenues; provide VPS with ten (10) customer bills supporting that the refund process has been completed; and file an affidavit, signed by an officer of the company, attesting that the company: corrected its KUSF reporting procedures to exclude international calling usage revenues from its reporting revenues within 60 days of the Order Adopting the Report.

3. On May 21, 2024, the Commission's order adopted VPS's April 25, 2024, Audit Report recommendations.

4. On June 4, 2024, USCOC filed a Petition for Reconsideration of the commission's May 21, 2024, Order Adopting Audit Report's 60 day deadline for billing system changes and issuance of any refunds. USCOC requests the deadline be extended to November 18, 2024. VPS's Compliance Report would accordingly be due by December 18, 2024.

WHEREFORE, Staff does not object to extension of the deadline to November 18, 2024. Staff respectfully requests the Commission give due consideration to requiring USCOC to advise Staff of its progress toward complying with the requirements of the May 21, 2024, Order Adopting Audit Report should USCOC's Petition for Reconsideration be granted.

Respectfully submitted,

Brett W. Berry

Brett W. Berry #15026
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3287
b.berry@kcc.ks.gov

CERTIFICATE OF SERVICE

24-USCZ-106-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Response to Petition for Reconsideration was served via electronic service this 13th day of June, 2024, to the following:

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.berry@kcc.ks.gov

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.fedotin@kcc.ks.gov

LISA A. GILBREATH
PIERCE ATWOOD LLP
254 Commercial Street
Portland, ME 04101
lgilbreath@pierceatwood.com

STEPHANIE CASSIOPPI, SR. DIRECTOR, GOV'T AFFAIRS
USCOC OF NEBRASKA/KANSAS LLC
8410 BRYN MAWR
CHICAGO, IL 60631
stephanie.cassioppi@uscellular.com

ADRIANA WALTON, CHIEF OF LEGAL & GOV'T AFFAIRS
USCOC OF NEBRASKA/KANSAS LLC
8410 BRYN MAWR
CHICAGO, IL 60631
adriana.welton@uscellular.com

DAWN CARTELLONE, ADMINISTRATIVE ASSISTANT
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
dawn.cartellone@vantagepnt.com

WENDY HARPER, USF SERVICES MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
wendy.harper@vantagepnt.com

SHOMARI JACKSON
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
shomari.jackson@vantagepnt.com

DENNIS SMITH
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE STE B
SPRINGFIELD, IL 62704
dennis.smith@vantagepnt.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
nicole.stephens@vantagepnt.com

CERTIFICATE OF SERVICE

24-USCZ-106-KSF

Ann Murphy

Ann Murphy