## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

**Before Commissioners:** 

Shari Feist Albrecht, Chair

Jay Scott Emler

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.	)	

#### ORDER OPENING DOCKET

This matter comes before the State Corporation Commission of the State of Kansas ("Commission") for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

- 1. The Federal Communications Commission ("FCC"), in its *USF/ICC Transformation Order & FNPRM*, requires Eligible Telecommunications Carriers (ETCs) to submit specific information as outlined in 47 C.F.R. § 54.313, to the states, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1 of each year, beginning in the year 2012.
- 2. The Commission believes that this docket should be opened to collect those filings, as required by the FCC, and to determine whether the Commission should certify that the ETCs in Kansas will use their federal Universal Service Fund (USF) support for 2019 in compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and whether the

<sup>&</sup>lt;sup>1</sup> Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, (May 14, 2012), ¶ 10.

ETCs appropriately used their federal USF and Kansas Universal Service Fund (KUSF) support in 2017. States that desire ETCs to receive support pursuant to the USF high-cost program must file an annual certification with the FCC and USAC by October 1, stating that all federal high-cost support provided to such carriers within the state was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support was intended as required by 47 C.F.R. § 54.314.

3. Commission Staff ("Staff") prepared a Report and Recommendation, dated March 29, 2018, which is attached hereto and made a part hereof by reference. The Report and Recommendation addresses the above stated matters and requests the Commission open this docket. The Commission approves Staff's Report and Recommendation and adopts the request.

#### IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

- A. This docket shall be opened for the purpose of receiving information and certifications to ensure compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and ensure appropriate use of federal and Kansas Universal Service Fund support.
- B. The required ETC certifications for the year 2019, along with the attached worksheet(s) and a copy of their Form 481 shall be filed with the Commission in this docket on or before July 2, 2018.
- C. Citizen's Utility Ratepayer Board is made a party to this docket and shall be served with all entries of appearance, comments, forms and pleadings.
- D. The parties have fifteen (15) days, plus three (3) days if mailed service, from the date this order was served in which to petition for reconsideration. K.S.A. 66-118b; K.S.A. 77-529(a)(1).
- E. The Commission retains jurisdiction over the subject matter and parties for the purpose of issuing such further orders, as necessary.

#### BY THE COMMISSION IT IS SO ORDERED.

Albrecht.	Chair:	Emler.	Commis	sioner:	Apple.	Commissioner
1 1101 0 0 1110,	·,	,	001111111	,	PP · · ·	Commissioner

Dated:	04/05/2018				
_		Lynn	$\mathcal{M}$ .	Ret	

Lynn M. Retz

Secretary to the Commission

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#### STATE OF KANSAS

CORPORATION COMMISSION UTILITIES DIVISION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604-4027



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## GOVERNOR JEFF COLYER, M.D. SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | PAT APPLE, COMMISSIONER

## REPORT AND RECOMMENDATION UTILITIES DIVISION

TO:

Chair Shari Feist Albrecht

Commissioner Jay Scott Emler

Commissioner Pat Apple

FROM:

Christine Aarnes, Chief of Telecommunications

Jeff McClanahan, Director of Utilities

DATE:

March 29, 2018

**SUBJECT:** 

Docket No. 18-GIMT-394-GIT

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas

Universal Service Fund Support.

#### **EXECUTIVE SUMMARY:**

The Federal Communications Commission (FCC) requires Eligible Telecommunications Carriers (ETCs) to submit specific information as outlined in 47 C.F.R. § 54.313 to the states, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1<sup>st</sup> of each year, beginning in 2012. In addition, pursuant to 47 C.F.R. § 54.314 and 47 U.S.C. § 254(e), states that desire ETCs to receive support pursuant to the federal high-cost program must file an annual certification with USAC and the FCC stating that all federal high-cost support provided to such carriers within that state was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Staff recommends the Commission open a generic docket to collect the required filings and to determine whether the Commission should certify to the FCC and USAC that all federal high-cost support provided to ETCs in Kansas was used in 2017 and will be used in 2019 only for the provision, maintenance, and upgrading of facilities for which the support is intended. The docket

<sup>&</sup>lt;sup>1</sup> Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, (May 14, 2012), ¶ 10.

should further include a certification and analysis to ensure Kansas Universal Service Fund (KUSF) support was used in 2017 and will be used in 2019 appropriately. Each filing should be submitted separately by company and a copy of the supporting Excel files for Attachments 2-5 should be emailed to Staff at <u>c.aarnes@kcc.ks.gov</u>.

#### **BACKGROUND:**

Section 254(e) of the Federal Telecommunications Act provides that carriers receiving federal high-cost support shall use the support "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." (Emphasis Added). The FCC delegated the responsibility of oversight of Section 254(e) to the states.

Therefore, the Commission must send a letter by October 1 of each year to the FCC and USAC stating that the companies named in the letter have provided certification that they will use their federal high-cost support in accordance with Section 254(e) and that they used their federal high-cost support the prior year in accordance with Section 254(e) in order for the ETCs to be eligible to receive federal high-cost support the following year.

In addition, the Commission determined on January 30, 2009, in Docket No. 08-GIMT-154-GIT (154 Docket), that ETCs must provide information to document that the carriers appropriately spent their KUSF support and will continue to spend their KUSF support appropriately.

Beginning in 2013, the FCC required ETCs to file Form 481 and file a copy of their Form 481 with respective state commissions by July 1 of each year. However, in a July 7, 2017 Report and Order, the FCC determined, among other things, that it will no longer require ETCs to file a copy of their Form 481 with the state commissions, contingent upon USAC's completion of the rollout of an online portal for recipients of high-cost services.<sup>2</sup> Staff contacted USAC and was informed that the online portal is active; therefore, it is Staff's understanding that ETCs are no longer required to submit a copy of their Form 481 to the Commission.

#### **ANALYSIS:**

#### **Kansas ETC Certification Forms**

Listed below are the Forms and Instructions that will be used for this year's filing:

Attachment	
<u>No.</u>	<b>Description</b>
1	Certification Form for Federal High-Cost Support and KUSF Support
2a	Kansas' Test for Certification for Incumbent Local Exchange Carriers (ILECs)
2b	Kansas' Test for Certification for ILECs Using Illustrative Data
3a	Kansas' Test for Certification for Competitive ETCs
3b	Kansas' Test for Certification for Competitive ETCs Using Illustrative Data
4	Narrative Report for New Investments
5	Narrative Report for New Investments in Southwestern Bell Telephone Company
	d/b/a AT&T Kansas (SWBT) Exchanges (Certifies KUSF Support)

<sup>&</sup>lt;sup>2</sup> In the Matter of Connect America Fund ETC Annual Reports and Certifications, WC Docket No. 10-90, 14-58, Report and Order, Rel. July 7, 2017.

Attachment 7 contains the instructions for completing Attachments 1-6.

- ➤ ILECs that received in 2017 and/or will receive federal high-cost support and/or KUSF support in 2019 should complete Attachments 1, 2a, 4, and 6.
- Competitive ETCs that received in 2017 and/or will receive federal high-cost support and/or KUSF support in 2019 need to complete Attachments 1, 3a, 4, 5 and 6. However, competitive ETCs providing universal service using Local Wholesale Complete (LWC) must submit only Attachments 1 and 6 and include a statement that the company receives KUSF support only for lines to which it provisions service via LWC.
- Lifeline-Only ETCs need to complete only Attachment 6.

Attachments 2b and 3b are provided for illustration purposes to complete the respective 2a and 3a cost reports. Competitive ETCs that operate in SWBT exchanges and receive KUSF support need to complete Attachment 5 by reporting new investments made in KUSF-supported exchanges, as required in the Commission's January 30, 2009 Order in the 154 Docket.<sup>3</sup> Additionally, competitive ETCs should exclude expenses and investments for SWBT exchanges when justifying federal high-cost support on Attachments 3a and 4, pursuant to the Commission's August 9, 2007, Order in the 07-GIMT-498-GIT (498 Docket).<sup>4</sup>

#### **RECOMMENDATION:**

Staff recommends the Commission open a generic docket to collect the required filings and to determine whether the Commission should certify to the FCC and USAC that all federal high-cost support provided to ETCs in Kansas was used in 2017 and will be used in 2019 only for the provision, maintenance, and upgrading of facilities for which the support is intended. The docket should further include a certification and analysis to ensure KUSF support was used in 2017 and will be used in 2019 appropriately.

Staff further recommends the Commission require ETCs and competitive ETCs to submit their ETC certifications for 2017, along with the required attached worksheets on or before July 2, 2018. Each filing should be submitted separately by company and a copy of the supporting Excel files for Attachments 2-5 should be emailed to Staff at <a href="mailto:c.aarnes@kcc.ks.gov">c.aarnes@kcc.ks.gov</a>. Carriers should be reminded that late or incomplete filings may result in a fine or penalty.

<sup>&</sup>lt;sup>3</sup> Commission Order dated January 30, 2009, 154 Docket, Staff Report on Workshop, page 12.

<sup>&</sup>lt;sup>4</sup> In the 498 Docket, the Commission reaffirmed its previous decision not to certify competitive ETCs' expenditures and investments of federal high-cost support in non-supported areas, which are areas served by SWBT, except to the extent the competitive ETCs can justify an allocation of a portion of expenditures and investments of federal high-cost support to serve a supported area.

# 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 with Section 254(e) of the Feder Telecommunications Act of 199 Certification of Appropriate Use Universal Service Fund Support	al ) 6 and ) Do c of Kansas )	ocket No. 18-GIMT-394-GIT						
FEDERAL HIG FCC D and KANSAS	CTION 254(e) CERTIFICE GH-COST UNIVERSAL S ocket Reference: CC Dock S UNIVERSAL SERVICE (Please type or print legitals all appropriate support	SERVICE SUPPORT ket No. 96-45 C FUND SUPPORT bly)						
1. My title	is	of						
	(Company/ Coo	perative). In this capacity, I am in a						
position of authority to direct how	federal high-cost Universal Ser	rvice Fund (USF), Connect America Fund						
(CAF) support, and/or Kansas Uni	versal Service Fund (KUSF) s	support received will be used and by this						
certification I am binding	((	Company/Cooperative) to the statements						
made in this certification.								
2.		_ (Company/Cooperative) was named as						
an eligible telecommunications car	rier by the Kansas Corporatio	on Commission (KCC) for federal support						
purposes in Docket No	1	by order dated						
and KUSF support purposes	in Docket No.	by order dated						
3. By this affidav	•	SF, CAF and/or KUSF received by was used in the proceeding calendar year						
<b>2017</b> and will be used in the new		he provision, maintenance, and upgrading						

#### Attachment 1

of	facilities	and	services	for	which	the	support	İS	intended,	consistent	with	Section	254(e)	of	the
Те	lecommun	icatio	ons Act, a	nd/o	r Kansa	as sta	ntutes and	K	CC require	ments.					

I certify under penalty	of perjury under the	ne laws of the sta	ate of Kansas that th	e foregoing is true a	nd correct
(Pursuant to Kan. Stat.	Ann. 53-601.)				

Signature	
Printed/Typed Name	
Executed on	date.
Email address:	

Company Name:		
	DATA YEAR:	2017
	LINE	REGULATED AMOUNT
WORKING LOOPS 1. Total Loops 2. Category 1.3 Loops	(060) (070)	
INVESTMENT		
Plant Accounts     a. Acct 2001	(160)	
2. Selected Plant Accounts a. Acct 2210 b. Acct 2220 c. Acct 2230 d. Total Central Office Equip e. Circuit Equip Cat 4.13 f. Acct 2410	(230) (235) (240) (245) (250) (255)	\$ -
AMORTIZABLE TANGIBLE ASSETS	(800) (805) (810) (815) (820) (830)	
PART 36 - COST STUDY DATA  1. Cost Study Avg C&WF Acct 2410  2. Cost Study Avg C&WF Cat 1	(700) (710)	
C&WF CAT 1 Factor     COE CAT 4.13 Factor     Switching Factor		#DIV/0! #DIV/0! 1.000000

Company Name:		
	DATA YEAR:	2017
For the Following Lines, Use Gross Additions for	Plant and Ann	ual Amounts
for Expenses for the Test Year		
		DECL!! ATED
INVESTMENT, EXPENSE AND TAXES	LINE	REGULATED AMOUNT
Selected Plant Accounts		7 1110 0111
a. Acct 2230	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
Expenses - Plant Specific Exp		
a. Acct 6110	(335)	
b. Acct 6110 (benefits)	(340)	
c. Acct 6110 (rents)	(345)	
d. Acct 6120	(350)	
e. Acct 6120 (benefits) f. Acct 6120 (rents)	(355)	
g. Acct 6210	(360) (365)	
h. Acct 6210 (benefits)	(370)	
i. Acct 6210 (rents)	(375)	
j. Acct 6220	(380)	
k. Acct 6220 (benefits)	(385)	
I. Acct 6220 (rents)	(390)	
m. Acct 6230	(395)	
n. Acct 6230 (benefits)	(400)	
o. Acct 6230 (rents)	(405)	
p. (sum of lines 365+380+395)	(410)	-
q. Acct 6410	(430)	
r. Acct 6410 (benefits)	(435)	
s. Acct 6410 (rents)	(440)	•
t. Total Expenses Accts. 6110 - 6410	(445)	<b>5</b> -
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	
b. Acct 6530 (benefits)	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210)	(510)	
b. Acct 6560 (#2220)	(515)	
c. Acct 6560 (#2230)	(520)	
d. Acct 6560 (#2210-2230)	(525)	\$ -
e. Acct 6560 (#2410)	(530)	
5. Corporate Operating Expenses		
a. Acct 6710	(535)	
b. Acct 6710 (benefits)	(540)	
c. Acct 6720	(550)	
d. Acct 6720 (benefits)	(555)	
e.Total Corporate Operating Expense (line 535+550)	(565)	٠ -
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	
Sum of All Expenses (Excluding Depreciation)		\$ -
7. Taxes a. Acct 7200	(650)	
a. ACCL 1200	(650)	

Company Nar	ne:		
	DATA YEAR:	2017	
Test for use of FUSF & KUSF			
CAPITAL: 1. Category 1 C&WF		#DIV/0!	
1. Category I Cavvr		#51070!	
2. Category 4.13 COE and Switching		#DIV/0!	
MAINTENANCE:			
3. CWF - MAINT. EXP.		#DIV/0!	
4. COE - MAINT. SW		-	
5. COE - MAINT-OP SYSTEM		-	
6. COE - MAINT TRANS.		#DIV/0!	
7. CWF - NETWORK SUPPORT		#DIV/0!	
8. COE - NETWORK SUPPORT		#DIV/0!	
9. CWF GENERAL SUPPORT		#DIV/0!	
10. COE GENERAL SUPPORT		#DIV/0!	
20. CWF NETWORK OPERATION		#DIV/0!	
21. COE NETWORK OPERATION		#DIV/0!	
22. CWF EXEC. & PLANNING		#DIV/0!	
23. COE EXEC. & PLANNING		#DIV/0!	
24. CWF GENERAL ADMIN.		#DIV/0!	
25. COE GENERAL ADMIN.		#DIV/0!	
26. CWF OPERATING TAXES		#DIV/0! #DIV/0!	
27. COE OPERATING TAXES		#10/0!	
28. CWF BENEFITS - TTL OPER EXP		#DIV/0!	
29. COE BENEFITS - TTL OPER EXP		#DIV/0!	
30. CWF RENTS - TTL OPER EXP		#DIV/0!	
31. COE RENTS - TTL OPER EXP		#DIV/0!	

Company Name:				
	DATA YEAR:	2017		
A. Total Cash Expenditures Associated with USF		#DIV/0!		
B. Certified Federal USF Receipts:  B1. High Cost Loop Support / Frozen High Cost Support  B2. Safety Net Support  B3. Broadband Loop Support  B4. Safety Valve Support for acquired Exch.  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> </u>	
C. KUSF Receipts		ä		
D. Total FUSF and KUSF Receipts		8		
E. Do Expenditures Exceed FUSF Receipts?  Amount Expenditures Exceed Certified FUSF (negative number means FUSF exceeds Expenditures)	#DIV/0!	#DIV/0!	[A - B8]	
F. Do Expenditures Exceed FUSF & KUSF Receipts? Amount Expenditures Exceed Certified FUSF and/or KUS (negative number means FUSF/KUSF exceeds Expenditure)		#DIV/0!	[A - D]	
Please provide the following information: Contact:				
				ta,
#1				

Company Nam	Company Name: Wabaunsee Telephone Co				
	DATA YEAR	201	7		
	LINE	REGULA AMOL			
WORKING LOOPS 1. Total Loops	(060)		9,552		
2. Category 1.3 Loops	(070)		9,262		
INVESTMENT					
1. Plant Accounts					
a. Acct 2001	(160)	\$ 26,9	78,955		
2. Selected Plant Accounts					
a. Acct 2210 b. Acct 2220	(230)	5,2	247,838		
c. Acct 2230	(235) (240)	5.9	0 962,811		
d. Total Central Office Equip	(245)		10,649		
e. Circuit Equip Cat 4.13	(250)		061,618		
f. Acct 2410	(255)	13,	319,015		
MORTIZABLE TANGIBLE ASSETS					
Acct. 2680 Tot Assets	(800)		0		
Acct. 2680 (2230) COE Trans	(805)		0		
Acct. 2680 (Cat. 4.13) COE Trans Acct. 2680 (2410) Total CWF	(810) (815)		0		
Acct. 2680 (2410) Total CWP Acct. 2680 (2410) CWF-Cat 1	(820)		0		
Acct. 6560 (2680) Dep & Amort	(830)		0		
PART 36 - COST STUDY DATA					
1. Cost Study Avg C&WF Acct 2410	(700)	11,	311,817		
2. Cost Study Avg C&WF Cat 1	(710)	11,	718,782		
3. C&WF CAT 1 Factor			992124		
4. COE CAT 4.13 Factor			362300		
5. Switching Factor		1.	000000		

Company Name: Wabaunsee Telephone Co			
	DATA YEAR_	2017	
	LINE	REGULATED AMOUNT	
For the Following Lines, Use Gross Additions for for Expenses for the Test Year	Plant and Ann	ual Amounts	
tor Expenses for the rest rear			
NVESTMENT, EXPENSE AND TAXES  1. Selected Plant Accounts	LINE		
a. Acct 2230	(240)	198,228	
b. Total Central Office Equip	(245)	480,061	
c. Acct 2410 (Total)	(255)	436,274	
2. Expenses - Plant Specific Exp			
a. Acct 6110	(335)	12,628	
b. Acct 6110 (benefits)	(340)	1,362	
c. Acct 6110 (rents) d. Acct 6120	(345) (350)	256 211,447	
e. Acct 6120 (benefits)	(355)	8,068	
f. Acct 6120 (rents)	(360)	15,114	
g. Acct 6210	(365)	236,427	
h. Acct 6210 (benefits)	(370)	36,157	
i. Acct 6210 (rents)	(375)	2,922	
j. Acct 6220	(380)	0	
k. Acct 6220 (benefits) I. Acct 6220 (rents)	(385) (390)	0	
m. Acct 6230	(395)	108,923	
n. Acct 6230 (benefits)	(400)	14,821	
o. Acct 6230 (rents)	(405)	1,222	
p. (sum of lines 365+380+395)	(410)	\$ 345,350	
q. Acct 6410	(430)	882,320	
r. Acct 6410 (benefits)	(435)	124,429	
s. Acct 6410 (rents)	(440) _	63,079	
t. Total Expenses Accts. 6110 - 6410	(445)	\$ 1,451,745	
3. Expenses - Plant Non Specific Exp	(450)	007.707	
a. Acct 6530	(450)	287,767	
b. Acct 6530 (benefits)	(455)	45,519	
4. Depreciation & Amortization Exp	(E40)	200 405	
a. Acct 6560 (#2210) b. Acct 6560 (#2220)	(510) (515)	382,435 0	
c. Acct 6560 (#2230)	(520)	297,063	
d. Acct 6560 (#2210-2230)	(525)	679,498	
e. Acct 6560 (#2410)	(530)	677,375	
5. Corporate Operating Expenses			
a. Acct 6710	(535)	73,579	
b. Acct 6710 (benefits)	(540)	17,078	
c. Acct 6720 d. Acct 6720 (benefits)	(550)	428,472	
e.Total Corporate Operating Expense (line 535+550)	(555) (565)	\$ 502,051	
6. Other Expenses and Revenues			
a. Benefits Portion	(600)	425,974	
b. Rents Portion	(610)_	82,594	
Sum of All Expenses (Excluding Depreciation)		\$ 2,241,563	
7. Taxes a. Acct 7200	(650)	1,073,834	
u. / 100t / 200	(000)	1,070,004	

Company Name: Wabaunsee Telephone Company Inc.				
	DATA YEAR_	2017		
	LINE	REGULATED AMOUNT		
Test for use of FUSF and KUSF				
CAPITAL:				
1. Category 1 C&WF		432,838		
2. Category 4.13 COE and Switching		455,759		
MAINTENANCE:				
3. CWF - MAINT. EXP.		689,340		
4. COE - MAINT. SW		197,348		
5. COE - MAINT-OP SYSTEM		0		
3. COE - MAINT TRANS.		63,266		
7. CWF - NETWORK SUPPORT		5,595		
B. COE - NETWORK SUPPORT		3,799		
). CWF GENERAL SUPPORT		95,673		
10. COE GENERAL SUPPORT		64,963		
20. CWF NETWORK OPERATION		123,106		
21. COE NETWORK OPERATION		83,591		
22. CWF EXEC. & PLANNING		28,713		
23. COE EXEC. & PLANNING		19,496		
24. CWF GENERAL ADMIN.		193,891		
25. COE GENERAL ADMIN.		131,655		
26. CWF OPERATING TAXES		545,701		
27. COE OPERATING TAXES		370,541		
28. CWF BENEFITS - TTL OPER EXP		216,472		
29. COE BENEFITS - TTL OPER EXP		146,988		
30. CWF RENTS - TTL OPER EXP		41,973		
31. COE RENTS - TTL OPER EXP		28,500		

Company Name: Wabaunsee Telephone Company Inc.					
Company Name	vabadiise	e rerepriorie o	ompany me.		
	DATA YEAR	2017	_		
	LINE	REGULATED AMOUNT			
A. Total Cash Expenditures Assd with USF		3,939,208			
B. Certified Federal USF Receipts: B1. High Cost Loop Support / Frozen High Cost Support B2. Safety Net Support B3. Broadband Loop Support B4. Safety Valve Support for acquired Exch.		820,931			
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		820,931	7		
C. KUSF Receipts		2,500,000			
D. Total FUSF and KUSF Receipts		3,320,931			
E. Do Expenditures Exceed FUSF Receipts?  Amount Expenditures Exceed Certified FUSF  (negative number means FUSF exceeds Expenditures)	Yes	\$ 3,118,277	[A - B7]		
F. Do Expenditures Exceed FUSF & KUSF Receipts? Amount Expenditures Exceed Certified FUSF & KUSF (negative number means FUSF & KUSF exceeds Expendi	Yes tures)	618,277	[A - D]		
Please provide the following information:	Contact:	John Smith			
	Title:	Accountant			
	Phone No.:	785-555-1234			
	E-Mail:	jsmith@wtci.com			

Company Name :				<del>-</del>			
All CETCs must complete this form to receive certification for	its use of FUSF a	nd KUSF suppo	rt, pursuant	to 47 C.F.R. § 54.31	4, Kansas statu	ites, and KC	C Requirements.
Please attach additional pages if necessary. If you have any que	stions, please em	ail the KCC Sta	iff at c.aarne	s@kcc.ks.gov.			
Data Year	2017						
	AMOUNT FOR KANSAS	ALLOCATION PERCENT	FUSF CODE (see Notes)	AMOUNT FOR FUSF AREAS (Excluding SWBT Area)	ALLOCATION PERCENT	KUSF CODE (see Notes)	AMOUNT FOR KUSF AREAS (Including SWBT Area)
FUSF WORKING LOOPS/LINES KUSF SUPPORTED LINES	Α	В	C	D=AxB	E	F	G = AxE
NEW INVESTMENTS: 1. SWITCHING 2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1) SUBTOTAL NEW INVESTMENTS	\$ -			\$ 20			\$ -
EXPENSES:  3. SWITCH MAINTENANCE  4. OUTSIDE PLANT MAINTENANCE  5. NETWORK SUPPORT  6. ADMINISTRATIVE EXPENSE SUBTOTAL EXPENSES	\$ -			* · · · · · · · · · · · · · · · · · · ·			* ·
A. TOTAL CASH EXPENDITURES ASSD WITH USF	\$ -			\$ -			\$ -
B. CERTIFIED FUSF RECEIPTS FOR CETCS B1. Frozen High Cost Support B2. Mobility Fund Support B3. Rural Broadband Experiments Fund B4. Total Certified Federal USF Receipts				\$			\$ -
C. KUSF RECEIPTS				\$ 2			\$ -
D. TOTAL FUSF AND/OR KUSF				\$ -			\$ -
E. DO EXPENDITURES EXCEED FUSF RECEIPTS? No (negative number means FUSF exceeds Expenditures)				\$ -			\$ -
F. DO EXPENDITURES EXCEED FUSF and/or KUSF RECEIPTS? (negative number means KUSF exceeds Expenditures) No				\$ -		No	\$ -
Notes:  1) Exclude the cost of transport between switches (dial-tone and/or ta	ndem).						
2) Allocation Codes (describe how the costs are allocated): [the follo a. Based on number of switched MOUs from USF supported cell sites b. Based on actual expenditures at USF cell sites. An allocation of U (i.e. 200,000 investment at Cell Site A, which serves 80% USF suppoc. Based on percent of USF served areas to all areas.	s. SF area to total se	rved area is appl	ied at each ce	ell site.			
Contact Name:		Title: _					
Phone No.:		E-Mail:					

#### Example CETC Investment and Expense Test for USF Certification

Company Name :	Everyday Tele	ephone Comp	any, Inc.	<del>-</del>			
All CETCs must complete this form to receive certification for					4, Kansas statu	tes, and KC	C Requirements.
Please attach additional pages if necessary. If you have any que	stions, please em	ail the KCC Sta	ff at c.aarne	s@kcc.ks.gov.			
		21.7					
Data	2017	[1]					
Year	2017						
	AMOUNT	ALLOCATION	FUSF CODE	AMOUNT FOR	ALLOCATION	KUSF CODE	AMOUNT FOR
a a	FOR KANSAS	PERCENT	(see Notes)	FUSF AREAS	PERCENT	(see Notes)	KUSF AREAS
				(Excluding SWBT			(Including SWBT
	Α	В	С	Area) D=AxB	Е	F	Area) G = AxE
FUSF WORKING LOOPS/LINES	50,000	N/A		17,500	N/A		15,000
KUSF SUPPORTED LINES							
NEW INVESTMENTS:							- 1
1. SWITCHING	5,000,000	35%	а	1,750,000	50%		2,500,000
2.OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1) SUBTOTAL NEW INVESTMENTS	7,000,000 <b>12,000,000</b>	62%	b	4,340,000	75%	С	5,250,000 <b>7,750,000</b>
SOBTOTAL NEW INVESTIGENTS	12,000,000			0,000,000			7,700,000
EXPENSES:	4 500 000	7504		4 405 000	0501		075 000
3. SWITCH MAINTENANCE 4. OUTSIDE PLANT MAINTENANCE	1,500,000 4,000,000	75% 52%	a c	1,125,000 2,080,000	25% 48%		375,000 1,920,000
5. NETWORK SUPPORT	500,000	52%	C	260,000	48%		240,000
6. ADMINISTRATIVE EXPENSE	400,000	75%	а	300,000	25%		100,000
SUBTOTAL EXPENSES	6,400,000			3,765,000			2,635,000
A. TOTAL CASH EXPENDITURES ASSD WITH USF	18,400,000			9,855,000			10,385,000
B. CERTIFIED FUSF RECEIPTS FOR CETCS							
B1. Frozen High Cost Support B2. Mobility Fund Support				83,500			83,500
B3. Rural Broadband Experiments Fund							
B4. Total Certified Federal USF Receipts				\$ 83,500			\$ 83,500
C. KUSF RECEIPTS				\$ 200,000			\$ 200,000
D. TOTAL FUSF AND/OR KUSF				\$ 283,500			\$ 283,500
E. DO EXPENDITURES EXCEED FUSF RECEIPTS? Yes (negative number means FUSF exceeds Expenditures)				\$ 9,771,500			\$ 10,301,500
F. DO EXPENDITURES EXCEED FUSF and/or KUSF RECEIPTS? (negative number means KUSF exceeds Expenditures) Yes				\$ 9,571,500		Yes	\$ 10,101,500
Notes:  1) Exclude the cost of transport between switches (dial-tone and/or ta	ndem).						
<ol> <li>Allocation Codes (describe how the costs are allocated): [the followard a. Based on number of switched MOUs from USF supported cell sites</li> </ol>		only, not a comp	iete list.j				
b. Based on actual expenditures at USF cell sites. An allocation of U	SF area to total se			ell site.			
<ul><li>(i.e. 200,000 investment at Cell Site A, which serves 80% USF supporting to Based on percent of USF served areas to all areas.</li></ul>	rted area, results in	n 160,000 of USF	dollars.)				- 1
c. based on percent or our served areas to an areas.							
Contact: Robert Jo	ones	Title: A	Accounting				
		_			•		
Phone No.: 316-555-	9670	E-Mail: I	jones@edtc.d	com			

### **Narrative Report for New Investments**

Company Name: \_\_\_\_\_

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

Data Year:	2017	_			
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
Α	В	С	D	Е	F= C x D
Subtotal		0			0
Total		0			0
NOTES:	This total amo Subtotal on th (245 & 255).				
Contact:		Phone No.:			
Title:		- E-Mail:			

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### **Narrative Report for New Investments**

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

Carrier Name:	0	Supplementa
Data Year:	2017	Pages

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
A	В	С	D	Е	F= C x D
A	D	C	ט	<u> </u>	F- C X D
			·		
Subtotal		0			0

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### Narrative Report for New Investments in SWBT Exchanges

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

Carrier Name: \_\_\_\_\_\_

Data Year:	2017				
					Amount Used
					in the KUSF
		Cash	<b>Allocation</b>		Supported
Town or Exchange	<b>Description of Improvement</b>	Investment	%	Notes	Areas
A	В	С	D	E	F= C x D
			[		
Subtotal		0	,		0
Total		0			0
, our					
NOTES:					
Contact:		Phone No.:			
Title:		E-Mail:			

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### Narrative Report for New Investments in SWBT Exchanges

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

Carrier Name:	0	Supplemental
Data Year:	2017	Pages

Town or Exchange	Description of Improvement	Cash Investment	Allocation	Notes	Amount Used in the KUSF Supported Areas
A	В	С	<b>%</b>	E	F= C x D
Subtotal	1	0			0

# 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).

17 0110 113(0)	•				
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

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential c recipient's service areas that were unfulfilled during the prior applicable, please explain how your company attempted to provide potential customers.	calendar year. If
3. Please provide the number of complaints per 1,000 connections (fix prior calendar year.	ed or mobile) in the

**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 <u>WIRELINE</u> ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is	of the
	am in a position of authority to certify whether the
Company/ Cooperative is complying with re-	quired quality of service standards. I am binding
(Company/Coopera	tive) to the statements made in this certification.
2. By this affidavit, I certify that	(Company/ Cooperative) is in
	rvice standards as adopted in Docket No. 191,206-U.
I certify under penalty of perjury unde	r the laws of the state of Kansas that the foregoing is
true and correct. (Pursuant to Kan. Stat. Ann. 53	3-601.) Executed on(date).
	Signature
	Printed/Typed Name
KCC Docket Refer	ELESS ANNUAL CERTIFICATION rence: 06-GIMT-446-GIT e 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 re-	quired quality of service standards. I am binding
(Company/Cooperative	e) 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	r the laws of the state of Kansas that the foregoing is
true and correct. (Pursuant to Kan. Stat. Ann. 53	3-601.) 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 of the				
(Company/ Cooperative)	. In this capacity,	I am in a position of	authority to certify v	vhether the
Company/ Cooperative	is able to	function in an e	mergency. I an	n binding
	(Company/Co	operative) to the state	ements made in this ce	rtification.
2. By this	affidavit, I certify	that		(Company/
Cooperative) is capable of	of functioning in an	emergency.		
I certify under po	enalty of perjury ur	nder the laws of the st	tate of Kansas that the	foregoing
is true and correct.	(Pursuant to	Kan. Stat. Anr	n. 53-601.) Exe	ecuted on
	(date).			
		Signatur	re	
		Printed /	Typed Name	
6. 47 U.S.C. § 214(e)(service area for which Please complete the form	n it has been de	-		-
Name of Media	Type of Media	Geographic Ar Reached	reas Dates Pu	blished
				30 M C 1945 M P 1955 P 1955 S - 4 F 1956 M C 195

(If necessary, please attach additional pages.)

	y that it offers a local usage plan comparable to that of lescription of the local usage plan(s) that is comparable plete the certification.
Manual Association and the second sec	
<b>W</b>	
KCC Dock	L USAGE PLAN ANNUAL CERTIFICATION Ket Reference: 06-GIMT-446-GIT Clease type or print legibly)
1. My title is	of the
	pacity, I am in a position of authority to certify whether the
Company/ Cooperative offers a loc	al 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/
	n comparable to that of the incumbent.
I certify under penalty of pe	rjury under the laws of the state of Kansas that the foregoing
is true and correct. (Pursu	ant to Kan. Stat. Ann. 53-601.) Executed on
(date).	
	Signature
	Printed/Typed Name

The Kansas Corporation Commission (KCC) requires every Eligible Telecommunications Carrier (ETC) to complete the ETC certification forms as part of the annual ETC certification process.

If you have any questions, please contact the Telecommunications Division at 785-271-3132 or c.aarnes@kcc.ks.gov.

#### 1. Line Definitions:

#### Working Loops for federal High-Cost Supported Services

Provide the line counts by incumbent local exchange carrier (ILEC) study area or wire center that were reported to the Universal Service Administrative Company (USAC) for the same year as the cost data is reported.

## 2. Attachments 2 and 3 – ILEC ETC and Competitive ETC Investment and Expense Reports

#### a. ILEC ETC Report Format

Attachment 2a is used by Incumbent ETCs to report their use of federal high-cost support received in the prior year. The report is a modified version of the cost information submitted to USAC for high-cost support, with the prior year data used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually used to provide universal service in the supported areas for which the support was paid. Support should be segregated by the type of federal high-cost support received. KUSF support is required to be certified and, similar to federal support, the support must also be used to provide and maintain universal service. Attachment 2b is an example of how to complete Form 2a.

#### b. Competitive ETC (CETC) Report Format

Attachment 3a is used by CETCs to report their use of high-cost funds received in the prior year. Prior year data is used to evaluate past certifications provided by the companies. Amounts reported should reflect the <u>amounts actually expended</u> to provide universal service in the supported areas for which the support was paid.<sup>2</sup> If no universal service support was received for the prior year, the company need only file a statement to that effect. Cost information is split by new investment expenditures and expenses. This is compared to the amount of federal high-cost support received. KUSF support is required to be certified and, similar to federal high-cost support, the support must also be

1

<sup>&</sup>lt;sup>1</sup> Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

<sup>2</sup> Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

used to provide and maintain universal service. Attachment 3b is an example showing how to complete Form 3a.

The company should exclude the cost of transport between switches. This makes the reporting consistent with the costs submitted by the Incumbent ETCs. Once a call leaves the local switch, it is on the interoffice network and costs for those facilities are not included. The switch is the devise that provides dial tone and/or switching the call to the proper location for termination. This can be a smart remote with stand-alone capability<sup>3</sup> or a stand-alone/host switch.

#### c. Allocation Methods

The cost reports attempt to capture the cost to provide universal service and exclude certain types of investments and expenses. The FCC has deregulated some services, including voice messaging and inside wire; therefore, they should be excluded.

The allocation of new investments and expenses may play an important role in properly identifying the costs associated with the USF supported areas. Incumbent LECs utilize a series of allocation rules in the Separations process that are specific and documented. However, even ILECs may encounter situations where only a portion of their territory receives high-cost support.

CETCs, especially, may serve exchanges that are supported as well as areas that are not supported. Some costs may be specific to the supported area, while others may involve both areas. A number of valid methods are available to make these allocations. Below is a list of examples that will normally be acceptable in making allocations:

Outside plant projects –the supported areas' allocations can be determined as follow:

- 1. Identify the specific costs in supported areas and assign it as a qualified cost.
- 2. Determine the number of lines in the supported area versus the total lines served by the facilities.
- 3. Determine the geographic area in the supported area versus the total area served (this method is especially applicable to cellular towers).
- 4. Calculate the percent of miles on a cable that serves a supported area versus the total miles to all the areas.
- 5. Calculate the percent of fiber strands or cable pair that go to a supported area versus the total strands in service.

Expenses may be allocated based on the allocation determined for the related investment, or based on a percentage of lines or customers in the supported areas.

Maintenance expense may be allocated based on the number of items being maintained that are in the supported areas.

<sup>&</sup>lt;sup>3</sup> A smart remote with stand-alone capability is one that can still provide local calling even if its link to the host switch is severed.

#### Switching may be allocated using the following methods:

- 1. Calculate the percent of Minutes of Use (MOU) for the lines in the supported area versus all minutes.
- 2. Calculate the percent of lines in the supported area versus all lines served by the switch.
- 3. Similar allocations could apply to circuit equipment used for switched access.

#### General rules to follow when deciding on the allocation method:

- 1. Allocations may be calculated by individual investment location, by region or for the whole state.
- 2. Companies may decide which methods work best based on the accounting and network information they have available.
- 3. Methods can vary for different types of investment or expense.
- 4. The method is one that is appropriate for the item being allocated (i.e. MOU would be appropriate for a switch allocation but not for a loop).
- 5. The allocation is based on measurable data.
- 6. The method captures a reasonable cost of the investment and/or expense.
- 7. The company should maintain consistency in the allocation methods used from year to year when providing data to the Commission. This will avoid gaming the system and provide the ability to make comparisons from year to year.
- 8. When a company changes an allocation method, it should be noted in the data submission, complete with rationale explaining why this new method is more appropriate. Also, the company should provide a calculation of what effect the new allocation would have on the prior year's report.

#### 4. Attachment 4 - New Investments Utilizing High-Cost Support in Supported Areas

#### a. Report Format

For the prior calendar year, please provide a description of the new investments in supported areas where the high-cost support was used. Please use a format similar to the *Narrative for New Investment Report*. The first example is for a wireless ETC and the second example is for a wireline ETC. It is acceptable to submit a mechanized report if it contains the essential information. Any projects over the threshold should be listed separately. Those projects less than the threshold should be combined into one or more line items. See 3b below for the threshold.

### **EXAMPLE** of Narrative for New Investment Report

#### **EXAMPLE of a WIRELESS COMPANY**

Town or Exchange	Description of Improvement	Cash Investment	Allocation	Notes	Amount Used in the USF Supported Areas
A	В	С	D	E	F=C x D
20 miles West of Oakley serving USF areas: Levant, Winona, and Russell Springs.		\$300,000	70%	[1]	\$210,000
	Switch Software Upgrade.	\$250,000	25%	[2]	\$50,000
TOTAL		\$550,000			\$260,000

#### **NOTES**

- [1] Percent of the service area that is USF supported on geography served.
- [2] Percent of switch that is USF supported based on lines served.

#### **EXAMPLE of a WIRELINE COMPANY**

Town or Exchange	Description of Improvement	Cash Investment	Allocation	Notes	Amount Used in the USF Supported Areas
A	В	С	D	E	F=C x D
Buffalo, Quincy, Toronto	Replaced OSP with digital line carrier and fiber feeder	\$1,250,000	100%	[1]	\$1,250,000
	terminals to remote switch in Eureka.	\$800,000	50%	[2]	\$400,000
TOTAL		\$2,050,000			\$1,650,000

#### **NOTES**

- [1] All of the exchanges in this project are USF supported.
- [2] Percent of lines served by the fiber ring in the USF supported exchanges.

The objective of this report is to identify that new investment is being spent to benefit supported areas. Listing individual exchanges that will benefit will help meet this purpose.

<u>b. Threshold</u> - For companies spending less than \$10M in new projects in Kansas, use \$200,000 as the project threshold. For companies spending \$10M or more, use \$500,000 as the project threshold. It is acceptable to provide more detail than the threshold requires if it helps identify which supported areas are receiving benefit.

#### 5. Attachment 5 - Report on the Use of KUSF Support Funding in SWBT Exchanges

The information and instructions for Attachment 5 are the same as Attachment 4 except that the purpose is to describe the use of KUSF Support in SWBT exchanges. ETCs that receive KUSF for SWBT exchanges should complete this report.

Additional questions on the allocation process may be referred to the KCC Staff, see contact number at the top of these instructions.

## 6. Attachment 6 – Annual Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT.

Provide the information as requested on the attachment and attach additional pages, as necessary. All ETCs must complete Questions 1-6. Only Competitive ETCs need to complete Question 7.

#### 18-GIMT-394-GIT

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

first class mail/hand delivered on \_\_\_\_04/06/2018

ANDREW SCHWANTNER, MANAGER-CONTRACT COMPLIANCE BIG RIVER TELEPHONE COMPANY, LLC 24 S MINNESOTA AVE 270 CAPE GIRARDEAU, MO 63703 Fax: 314-225-2235 noc@bigrivercom.com

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DAVID W. NICKEL, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 d.nickel@curb.kansas.gov SHARYL FOWLER, MANAGER, REGULATORY ADMDINISTRATION BIRCH TELECOM OF KANSAS, INC. 320 INTERSTATE NORTH PKWY SE ATLANTA, GA 30339 Fax: 816-300-3350 sharyl.fowler@birch.com

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18-GIMT-394-GIT

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MICHAEL J. MURPHY, PRESIDENT & MANAGER GORHAM TELEPHONE COMPANY 100 MARKET PO BOX 235 GORHAM, KS 67640 Fax: 785-637-5590 mmurphy@gorhamtel.com LARRY GATES, UTILITIES DIRECTOR CITY OF CHANUTE 101 SOUTH LINCOLN MEMORIAL BLDG, PO BOX 907 CHANUTE, KS 66720 Igates@chanute.org

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BEAU REBEL, GENERAL MANAGER GOLDEN BELT TELEPHONE ASSOCIATION. 103 LINCOLN ST PO BOX 229 RUSH CENTER, KS 67575 Fax: 785-372-4210 brebel@gbtlive.com

ROBERT A. KOCH, PRESIDENT/GEN MGR H&B CABLE SERVICE, INC. 108 N MAIN PO BOX 108 HOLYROOD, KS 67450 Fax: 785-252-3229 robkoch@hbcomm.net

18-GIMT-394-GIT

ROBERT A. KOCH, PRESIDENT/GEN MGR H&B COMMUNICATIONS, INC. 108 N MAIN PO BOX 108 HOLYROOD, KS 67450 Fax: 785-252-3229

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