

July 2, 2018

Ms. Lynn M. Retz
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

Re: Docket No. 18-GIMT-394-GIT
Section 254(e) Certification

Dear Ms. Retz:

Please find the attached copy of Section 254(e) Certification responses on behalf of N.E. Colorado Cellular d/b/a Viaero Wireless for filing in the above-referenced docket. Portions of the filing are deemed confidential as commercially and competitively sensitive or trade secret, the disclosure of which could cause irreparable financial harm to the company, and are therefore being filed under seal pursuant to K.S.A. 66-1220a.

If you have any questions or require additional information, don't hesitate to contact me.

Sincerely,

/s/ Susan B. Cunningham

Susan B. Cunningham
Counsel

Attachments

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 Executive Vice President / CFO of NE Colorado Cellular, Inc. d/b/a Viaero Wireless . 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 _ NE Colorado Cellular, Inc. d/b/a Viaero Wireless to the statements made in this certification.

2. NE Colorado Cellular, Inc. d/b/a Viaero Wireless was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 09-NECZ-747-ETC by order dated June 4, 2010 and KUSF support purposes in Docket No. 09-NECZ-747-ETC by order dated June 4, 2010.


3. By this affidavit, I certify that the USF, CAF and/or KUSF received by NE Colorado Cellular, Inc. d/b/a Viaero Wireless 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

Attachment 1

which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

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

Michael Felicissimo, Executive Vice President/CFO
Printed/Typed Name

Executed on July 2, 2018 date.

Email address: mike.felicissimo@viaero.com

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
n/a					

(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.

 We did not have any unfulfilled service requests

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

 zero

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 _____ 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 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 _____ (date).

Signature

Printed/Typed Name

QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION

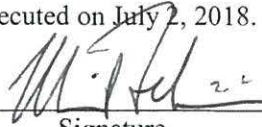
KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is Executive Vice President / CFO of the NE Colorado Cellular, Inc. d/b/a Viaero Wireless. 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 NE Colorado Cellular, Inc. d/b/a Viaero Wireless to the statements made in this certification.

2. By this affidavit, I certify that NE Colorado Cellular, Inc. d/b/a Viaero Wireless 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 July 2, 2018.


Signature

Michael Felicissimo

Print / Typed Name

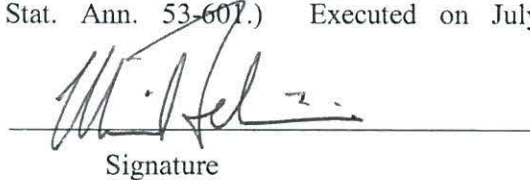
5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

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

1. My title is Executive Vice President / CFO of the NE Colorado Cellular, Inc. d/b/a Viaero Wireless. 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 NE Colorado Cellular, Inc. d/b/a Viaero Wireless to the statements made in this certification.

2. By this affidavit, I certify that NE Colorado Cellular, Inc. d/b/a Viaero Wireless 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. 53-607.) Executed on July 2, 2018.



Signature

Michael Felicissimo

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
Google Adwords	Social Media	Kansas	Jan – Dec, 2017
Colby Free Press	Print	Colby and surrounding area	Jan – Dec, 2017
Eagle Community TV	Television	Hays and surrounding area	Jan – Dec, 2017
Eagle Radio	Radio	Hays and surrounding area	Jan – Dec, 2017
J&D Publishing Inc/ Western Times	Print	Sharon Springs and surrounding area	Jan – Dec, 2017
KRSL	Radio	Russell and surrounding area	Jan – Dec, 2017
KSNB 1011	Radio	Hastings and surrounding area	Jan – Dec, 2017
MSPARK	Direct Mailing	Hays, Great Bend, Russell, Wakeeney, Hoisington, Dorrance,	July, 2017

Rocking M Radio	Radio	Manhattan and surrounding area	Jan – Dec, 2017
Russell County News	Print	Russell and surrounding area	Jan – Dec, 2017

(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.

See attached exhibit(s) 7-A, 7-B, 7-C

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

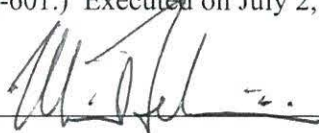
KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is Executive Vice President / CFO of the NE Colorado Cellular, Inc. d/b/a Viaero Wireless. 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 NE Colorado Cellular, Inc. d/b/a Viaero Wireless to the statements made in this certification.

2. By this affidavit, I certify that NE Colorado Cellular, Inc. d/b/a Viaero Wireless 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 July 2, 2018.



Signature

Michael Felicissimo

Printed/Typed Name



No Contracts | No Credit Checks | No Activation Fee | No Deposit

4G LTE UNLIMITED TALK & TEXT

TRULY HD UNLIMITED MOBILE DATA

WIFI HOTSPOT INCLUDED**

NATIONWIDE - CANADA - MEXICO*

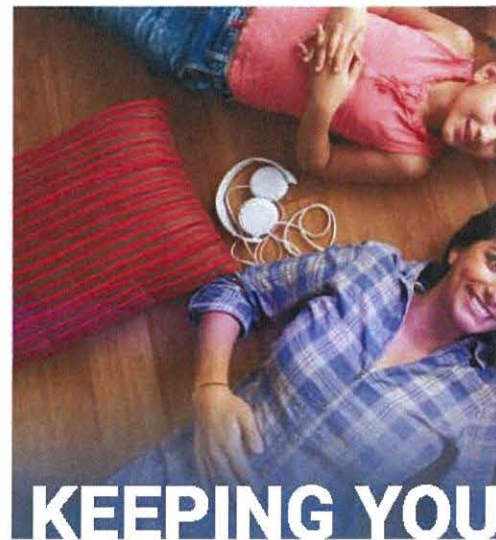
**2 Lines of Unlimited
HD Mobile Data \$110/mo.**

We won't slow you down!



QUESTIONS: WWW.VIAERO.COM OR VISIT YOUR LOCAL STORE

Not available for all handsets. Check with local store for details. *From home network. **Includes up to 1GB/day of high speed hot spot data, after which speed is reduced to 512kbps for the remainder of the day. Activation fee & tax not included. Current termination policies apply. Visit a Visero location or www.visero.com for details. Other restrictions may apply. For terms and conditions applicable to service plans, visit www.visero.com/legal. VZ.21.16



No Contracts | No Credit Checks

4G LTE UNLIMITED

TRULY HD UNLIMITED

WIFI HOTSPOT INCLUDED

NATIONWIDE - CANADA - MEXICO*

**2 Lines of
HD Mobile Data \$110/mo.**

We won't slow you down!



QUESTIONS: WWW.VIAERO.COM OR VISIT YOUR LOCAL STORE

Not available for all handsets. Check with local store for details. *From home network. **Includes up to 1GB/day of high speed hot spot data, after which speed is reduced to 512kbps for the remainder of the day. Activation fee & tax not included. Current termination policies apply. Visit a Visero location or www.visero.com for details. Other restrictions may apply. For terms and conditions applicable to service plans, visit www.visero.com/legal. VZ.21.16

DON'T NEED AN UNLIMITED PLAN?

Pick a Plan that meets your needs

**All Pre-Paid Plans include:
Unlimited Talk & Text and WiFi Hotspot****

**15 GB
DATA**

\$60

**10 GB
DATA**

\$45

**2 GB
DATA**

\$35

**1 GB
DATA**

\$30

*Includes Calling to
Mexico & Canada*

DON'T NEED AN UNLIMITED PLAN?

Pick a Plan that meets your needs

**All Pre-Paid Plans include:
Unlimited Talk & Text and WiFi Hotspot****

**15 GB
DATA**

\$60

**10 GB
DATA**

\$45

*Includes Calling to
Mexico & Canada*



No Contracts

No Credit Checks

No Activation Fee

No Deposit

VIAERO
WIRELESS



Name: _____ Phone: () _____ - _____

Date: ____ / ____ / ____ Email Address: _____

Associate Name: _____ Phone: () _____ - _____

1 SELECT PLAN

BETTER UNLIMITED

Talk/Text/Data[†]

- ___ 1 Line \$75
- ___ 2 Lines \$120
- ___ 3 Lines \$145
- ___ 4 Lines \$170
- ___ 5 Lines \$195
- ___ 6 Lines \$220

SHARE MORE

ACCESS CHARGE

Circle the charge for corresponding # of lines for each device. Add together for total Access Charges.

Lines	Phone*	Hot Spot	Tablet**
1 Line	\$25	\$20	\$10
2 Lines	\$50	\$40	\$20
3 Lines	\$75	\$60	\$30
4 Lines	\$100	\$80	\$40
5 Lines	\$125	\$100	\$50
6 Lines	\$150	\$120	\$60

*24/mo. service contract equipment purchases require \$40 access charge.
**Only \$5 when combined with smartphone or high-speed internet.

DATA BUCKETS

Circle the charge for desired data bucket & add to total Access Charges.

\$5.00	1GB [±]
\$10.00	2GB [±]
\$20.00	4GB [±]
\$35.00	8GB
\$45.00	16GB
\$55.00	24GB
\$67.50	30GB
\$90.00	40GB
\$112.50	50GB

[†]Includes up to 1 GB/Day of high speed hot spot data after which speed is reduced to 512kps for the remainder of the day. [±]Promotional pricing

2 SELECT ADDITIONAL FEATURES

- ___ Assurance Program Membership \$9
- ___ AppleCare+ for iPhone SE, iPad \$99 or \$33 x 3
- ___ AppleCare+ for iPhone 8, 7, 6s, or 6 \$129 or \$43 x 3
- ___ AppleCare+ for iPhone 8 Plus, 7 Plus, 6s Plus, or 6 Plus \$149 or \$49.67 x 3
- ___ AppleCare+ for iPhone X \$199 or \$66.33 x 3
- ___ Global Connect (Requires 6 mo's good payment history)..... \$10
- ___ Deluxe Voicemail w/Viaero VMail FREE
- ___ Premium Voice Mail (w/transcription for Android) \$3
- ___ Detail Paper Bill \$3
- ___ 2GB/Day High Speed Hot Spot \$35 ___ 3GB/Day High Speed Hot Spot \$65

3 ACCESSORIES

4 VIAERO HOME PHONE & HIGH

HOME PHONE

- ___ Home Phone (No Data) \$19.99
- ___ VIP International/National LD ... \$9.99
- ___ Call Conferencing \$
- ___ Call Forwarding \$

HIGH SPEED INTERNET

PRO CONNECT UNLIMITED INTERNET+

- ___ 5 Mbps \$35
- ___ 10 Mbps \$45
- ___ 15 Mbps \$65

HOME CONNECT WITH UNLIMITED

- ___ 25 GB Peak
- ___ 50 GB Peak
- ___ 100 GB Peak
- ___ 250 GB Peak

[±] Usage in excess of 15GB in any one day may be slowed based on network availability and capacity.

*Off peak: 12am - 6:59am

DEVICE CHARGES

DEVICE(S)	MO. PAYMENT	MO. LINE ACCESS CHARGE

TOTAL CHARGES

Devices	
Accessories	
Plan Charges	
Feature Charges	
*Total:	

[†]Does not include fees and taxes. All plans require eBill.

5

**BETTER
UNLIMITED⁺**

- | | |
|-------------|-------|
| ___ 1 Line | \$80 |
| ___ 2 Lines | \$110 |
| ___ 3 Lines | \$150 |
| ___ 4 Lines | \$190 |
| ___ 5 Lines | \$230 |

*Includes up to 1 GB/Day of high speed hot spot data after which speed is reduced to 512kps for the remainder of the day.

 METERED

- 1GB \$30
Unlimited Talk & Text + 1GB* High Speed Data
- 2GB \$35
Unlimited Talk & Text + 2GB* High Speed Data
- 10GB \$45
Unlimited Talk & Text + 10GB* High Speed Data
- 15GB \$60
Unlimited Talk & Text + 15GB* High Speed Data
(Includes Mexico/Canada Calling)

**Additional Nationwide High Speed Data \$.10/MB*

Worksheet:

Notes:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



Unlimited Home & Office Internet

— For As Low As —

\$30/MO.

when you bundle with a Viaero Wireless
Cell Phone Plan

LIMITED TIME ONLY!

- Save \$75 On Installation •
- \$25 Equipment Discount •

ProConnect - 24/7 Unlimited Data with no overages!

SPEEDS	MO. CHARGE	INCLUDED DATA
5Mbps Max.....	\$35.....	Unlimited*
10Mbps Max.....	\$45.....	Unlimited*
15Mbps Max.....	\$65.....	Unlimited*

*ProConnect usage in excess of 15GB in any one day may be slowed based on network availability and capacity. Service is not available in all areas. Service availability depends on terrain, weather, distance to tower, and other factors. Viaero has the final say on whether customer location meets minimum line of sight requirements. Where ProConnect service is not available customer may be offered other internet plan options at Viaero's discretion.

Sales Person: _____

Phone Number: _____

03.07.18.0



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LIMITED TIME ONLY!

- Save \$75 On Installation •
- \$25 Equipment Discount •

ProConnect - 24/7 Unlimited Data with no overages!

SPEEDS	MO. CHARGE	INCLUDED DATA
5Mbps Max.....	\$35.....	Unlimited*
10Mbps Max.....	\$45.....	Unlimited*
15Mbps Max.....	\$65.....	Unlimited*

*ProConnect usage in excess of 15GB in any one day may be slowed based on network availability and capacity. Service is not available in all areas. Service availability depends on terrain, weather, distance to tower, and other factors. Viaero has the final say on whether customer location meets minimum line of sight requirements. Where ProConnect service is not available customer may be offered other internet plan options at Viaero's discretion.

Sales Person: _____

Phone Number: _____

03.07.18.0