

COLLEEN R. JAMISON
JAMISON LAW, LLC

June 28, 2024

Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604

RE: S&T Communications, LLC
Docket No. 24-GIMT-612-GIT
254(e) certifications

Dear Ms. Retz:

On behalf of S&T Communications, LLC, attached please find for filing in Docket No. 23-GIMT-644-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 30, 2023.

In this filing, the entirety of Attachments 3 and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Cordially yours,

Colleen R. Jamison
JAMISON LAW, LLC

Encl.

cc: Zack Odell
Christina Hickert

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 24-GIMT-612-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 Federal and Kansas Support Received)

1. My title is CEO of S&T Communications, LLC (Company). In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding S&T Communications, LLC (Company) to the statements made in this certification.

2. S&T Communications, LLC (Company) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 10-S&CT-564-ETC by order dated October 13, 2010 and KUSF support purposes in Docket No. 10-S&CT-564-ETC by order dated October 13, 2010.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by S&T Communications, LLC

**Docket No. 24-GIMT-612-GIT
Attachment 1**

(Company) was used in the proceeding calendar year 2023 and will be used in the new calendar year 2025 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal 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.)

Zack Odell

Signature – Zack Odell

Printed - Zack Odell

Executed on 06/14/2024 date.

Email address: zack.odell@sttelcom.com

Company Name : S&T COMMUNICATIONS LLC

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R. § 54.314 and KCC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at s.garrett@kcc.ks.gov and h.bhagat@kcc.ks.gov.

Data Year	2023
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FUSF WORKING LOOPS/LINE Average No. Customers

NEW INVESTMENTS:

- 1. SWITCHING
- 2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)

SUBTOTAL NEW INVESTMENTS

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. CAF II Support
- B5. Rural Digital Opportunity Fund

B5. Total Certified Federal USF Receipts

C. DO EXPENDITURES EXCEED FUSF RECEIPTS?

(negative number means FUSF exceeds Expenditures)

Notes:

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
 - a. Based on number of switched MOUs from USF supported cell sites.
 - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
 - c. Based on percent of USF served areas to all areas.

Contact Name: Zack Odell

Title: CEO

Phone No.: 785-694-2256

E-Mail: zackodell@sttelcom.com

Narrative Report for New Investments

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

Company Name: S&T Communications LLC

Data Year: 2023

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
A	B	C	D	E	F= C x D
Subtotal					
Total					

NOTES:

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255). For CETCs, this amount should match the

Contact: Zack Odell
Title: CEO

Phone No.: 785-694-2256
E-Mail: zack.odell@sttelcom.com

Annual ETC Certification of Requirements Imposed by the
Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 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 C.F.R. § 4.5(e)?

(No) No . IF YES, PLEASE COMPLETE THE FOLLOWING:

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.

 0

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

 0.04273504

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 CEO of the S&T Communication, LLC (Company). In this capacity, I am in a position of authority to certify whether the Company is complying with required quality of service standards. I am binding S&T Communications, LLC (Company) to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications, LLC (Company) 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 6/14/2024 (date).



Signature

Zack Odell

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 _____ 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 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 _____ (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 C.F.R § 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 CEO of the S&T Communications, LLC (Company). 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 S&T Communications, LLC (Company) to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications, LLC (Company) 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. 53-601.) Executed on 06/14/2024 (date).

Zack Odell

Signature

Zack Odell

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline 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
S&T Website; Google Ads; YouTube	Internet	Worldwide	24 / 7 /365
KGCR - FM	Radio	Northwest Kansas	Varies - Monthly
KRDQ	Radio	Northwest Kansas	Varies - Monthly
KWGB - FM	Radio	Northwest Kansas	Varies - Monthly
KXXX / KQLS	Radio	Northwest Kansas	Varies - Monthly
KLOE - AM	Radio	Northwest Kansas	Varies - Monthly
S&T Media	CATV	Service Areas	Varies - Monthly
Various	Newspapers	Northwest Kansas	Varies
Facebook; Instagram; LinkedIn	Social	Worldwide	Varies

	S&T Annual Phone Directory	Print	Brewster, Colby, Dighton, Goodland, Grinnell, Kanorado, Levant, Menlo, Russell Springs, Winona, Atwood, Bird City, Gove, Grainfield, Hoxie, Leoti, McDonald, Oakley, Sequin, Sharon Springs, Tribune, Wallace, Weskan Customers & non-customers receive the directory in the mail as long as they have a mailing address with the post office	November 2023
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(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 LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

Residential PKG LD Unlimited; Business PKG LD 1000; Business PKG LD 1500;
 Business PKG LD 3000; Business PKG LD 5000; Business PKG LD 7500

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
 (Please type or print legibly)

1. My title is CEO of the S&T Communications, LLC (Company). 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 S&T Communications, LLC (Company) to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications, LLC (Company) 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
 06/14/2024 _____ (date).



 Signature
 Zack Odell
 Printed/Typed Name