

June 29, 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 USCOC of Nebraska/Kansas LLC d/b/a U.S. Cellular 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 Vice President, Legal and Regulatory Affairs of United States Cellular Corporation ("U.S. Cellular"). 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 U.S. Cellular to the statements made in this certification.

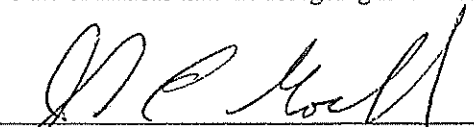
2. U.S. Cellular was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 06-USCZ-519-ETC by order dated February 10, 2006.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by U.S. Cellular 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 which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

Attachment 1

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

John C. Gockley

Executed on June 21, 2018 date.

Email address: John.Gockley@USCellular.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).

U.S. Cellular's outage report is included as Attachment 7.

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.

To ensure all existing and potential customers receive the best possible wireless service, when service issues are identified U.S. Cellular will:

- Inspect the customer's handset to ensure it is functioning properly and ensure that it has been properly programmed. If necessary, handsets under warranty will be promptly replaced or repaired. In circumstances where the phone is no longer under warranty, the customer will be made aware of his/her handset replacement options, i.e. repair, purchase of a new or used handset. Customer will also be advised of available modifications to his equipment that may allow the phone to successfully connect to U.S. Cellular's network.
- Inspect elements of U.S. Cellular's network to ensure that it is functioning as designed. If necessary, adjustments and repairs will be made as soon as practical and in a manner that has the least impact upon the customers. U.S. Cellular will perform drive testing in the affected area, if necessary, to determine the availability and strength of wireless signals. Also, U.S. Cellular will determine if the nearest cell site can be modified to serve the affected area.
- In certain situations, customers requesting service may reside outside of U.S. Cellular's CGSA but within U.S. Cellular's ETC area. To ensure that customers in this situation can receive wireless service, U.S. Cellular has in place comprehensive roaming agreements with other wireless carriers and "U.S. Cellular" service will be provided via other carriers' networks at no additional cost to the customer. However, in some instances, no cellular coverage from any cellular network is available.

U.S. Cellular continuously monitors its network for trouble spots, including areas where cellular signals are weak, non-existent or lacking due to capacity issues. Once a trouble

spot is identified, U.S. Cellular explores possible solutions and works to implement solution(s) as soon as practical. U.S. Cellular had nine requests for service from potential customers within its service area that were unfulfilled during 2017

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

Complaints per 1000 customers in calendar year 2017 equaled 0.0165.

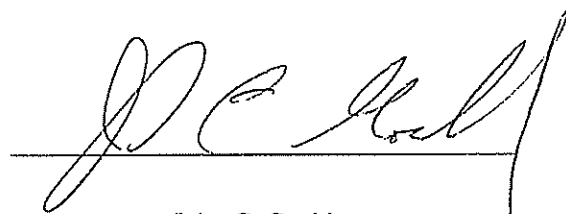
4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. **Please complete the following, as applicable to your company:**

QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

1. My title is Vice President, Legal and Regulatory Affairs of United States Cellular Corporation ("U.S. Cellular"). In this capacity, I am in a position of authority to certify whether U.S. Cellular is complying with required quality of service standards. I am binding U.S. Cellular to the statements made in this certification.

2. By this affidavit, I certify that U.S. Cellular 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 June 21, 2018.

A handwritten signature in black ink, appearing to read "John C. Gockley", written over a horizontal line.

John C. Gockley

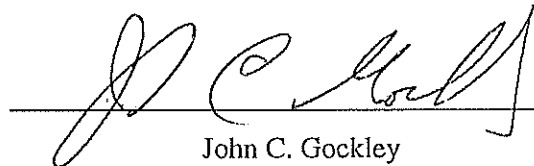
5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

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

1. My title is Vice President, Legal and Regulatory Affairs of United States Cellular Corporation ("U.S. Cellular"). In this capacity, I am in a position of authority to certify whether the U.S. Cellular is able to function in an emergency. I am binding U.S. Cellular to the statements made in this certification.

2. By this affidavit, I certify that U.S. Cellular 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 June 21, 2018.



John C. Gockley

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."

In 2017, U.S. Cellular advertised its service offerings throughout its licensed service area in Kansas. Advertising media used to advertise service offerings included television, radio, newspaper, outdoor media and the Internet. The mix of advertising media used is designed to reach the largest target audience possible and the message is structured to pique consumer interest in the products offered by U.S. Cellular. The cellular telephone industry is very competitive. Successful service providers must continuously reach out to existing and potential subscribers to ensure they are aware of the latest technology and service offerings. U.S. Cellular is including detailed advertising data with this report.

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.

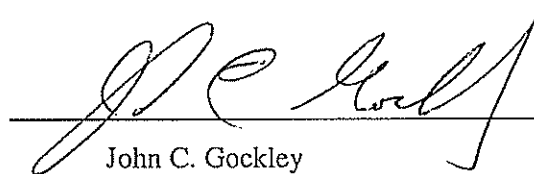
U.S. Cellular has a wide variety of rate plans that provide local usage consistent with 47 C.F.R. Sec. 54.101(a)(2). To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has concluded that a competitive ETC must demonstrate that it offers at least one rate plan that is comparable to the local usage plan of the ILEC serving the same area. U.S. Cellular offers several rate plans which provide customers with a variety of local usage included within the flat monthly rate. Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs, and U.S. Cellular will comply with any and all minimum local usage requirements adopted by the FCC. Current plan offerings may be found at <http://www.uscellular.com/plans/index.html>.

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

1. My title is Vice President, Legal and Regulatory Affairs of United States Cellular Corporation ("U.S. Cellular"). In this capacity, I am in a position of authority to certify whether the U.S. Cellular offers a local usage plan comparable to that of the incumbent. I am binding U.S. Cellular to the statements made in this certification.

2. By this affidavit, I certify that U.S. Cellular 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 June 21, 2018.


John C. Gockley

KANSAS ADVERTISING SCHEDULE
2017

State	Publication	Issue/ Insertion Date
Kansas	Cowley Courier Traveler	1/18/2017
Kansas	Cowley Courier Traveler	3/15/2017
Kansas	Emporia Gazette	1/18/2017
Kansas	Emporia Gazette	3/15/2017
Kansas	Hutchinson News	1/18/2017
Kansas	Hutchinson News	3/15/2017
Kansas	Iola Register	1/18/2017
Kansas	Iola Register	3/15/2017
Kansas	Junction City Daily Union	3/16/2017
Kansas	Manhattan Mercury	1/18/2017
Kansas	Manhattan Mercury	3/15/2017
Kansas	Salina Journal	1/18/2017
Kansas	Salina Journal	3/15/2017
Kansas	Cowley Courier Traveler	5/10/2017
Kansas	Emporia Gazette	5/10/2017
Kansas	Hutchinson News	5/10/2017
Kansas	Iola Register	5/10/2017
Kansas	Junction City Daily Union	5/11/2017
Kansas	Manhattan Mercury	5/10/2017
Kansas	Salina Journal	5/10/2017
Kansas	Cowley Courier Traveler	7/12/2017
Kansas	Emporia Gazette	7/12/2017
Kansas	Hutchinson News	7/12/2017
Kansas	Iola Register	7/12/2017
Kansas	Junction City Daily Union	7/13/2017
Kansas	Manhattan Mercury	7/12/2017
Kansas	Salina Journal	7/12/2017
Kansas	Cowley Courier Traveler	11/8/2017
Kansas	Emporia Gazette	11/8/2017
Kansas	Hutchinson News	11/8/2017
Kansas	Iola Register	11/8/2017
Kansas	Junction City Daily Union	11/9/2017
Kansas	Manhattan Mercury	11/8/2017
Kansas	Salina Journal	11/8/2017



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Things we want you to know: Lifeline is a federal government benefit program and only qualified persons may participate. Lifeline service may not be transferred to any other individual. Applicants must present documentation of household income or participation in qualifying programs. Lifeline is only available for one phone line per household, whether landline or wireless. The Lifeline Calling Plan/Lifeline discounts are only available to residents in states where U.S. Cellular is an Eligible Telecommunications Carrier (ETC). Eligibility to receive Lifeline discounts will be verified annually. In areas in which U.S. Cellular receives support from the Federal Universal Service Fund, all reasonable requests for service must be met. Unresolved questions concerning services availability can be directed to the Kansas Corporation Commission Office of Public Affairs and Consumer Protection at 1-800-662-0027. Lifeline Calling Plans support all of the federal universal services provided for in 47CFR Sec. 54.101. Additional terms and conditions apply. See store or uscellular.com for details. ©2017 U.S. Cellular