

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

In the Matter of the Audit of Netelligent)
Corporation by the Kansas Universal)
Service Fund (KUSF) Administrator) Docket No. 24-NCPV-118-KSF
Pursuant to K.S.A. 66-2010(b) for Fiscal)
Year 26, March 2022 – February 2023.)
)
)

MOTION FOR EXTENSION OF TIME

COMES NOW Netelligent Corporation (“Netelligent”) with a request of the Kansas Corporation Commission (“Commission”) for a motion for extension of time of the deadlines set forth in its May 10, 2024 Order Adopting Audit Report (“Order”) pursuant to K.S.A. 66-2010(b).

1. Pursuant to the Commission’s August 17, 2023 Order to Commence Audit, Netelligent Corporation assembled all information requested by Vantage Point Solutions (“VPS”) so that VPS may timely complete and file its Audit Report with the Commission.

2. VPS’ May 10, 2024 Audit Report makes the recommendations that the Commission recites at paragraph 3 of its order. That Audit Report notes that Netelligent Corporation shall:

- File audit True-Ups for FYs 25,26, and 27 to exclude Fax IP service revenues and Local Number Portability for Existing Numbers revenues from its reporting, and to correct the revenues for the July 2022 reporting period that were originally filed in error;
- Issue one-time billing credits in the amount of \$2,922.75 to its affected customers, on a pro-rata basis;

- Update its billing system to exclude KUSF surcharge collection from Fax IP services and Local Number Portability for Existing Number charges;
- Update its KUSF reporting procedures to exclude reporting of FAX IP service revenues and Local Number Portability for Existing Number charges;
- Provide VPS with four (4) 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:
 - a. Corrected its KUSF reporting procedures to omit Fax IP services and Local Number Portability for Existing Numbers charges from its reporting revenues.
 - b. Corrected its billing system to exclude KUSF surcharge collection from Fax IP services and Local Number Portability for Existing Numbers charges;
 - c. Issued refunds through one-time billing credits, totaling \$2,922.75, to its affected customers, on a pro-rata basis; and
 - d. Corrected the July 2022 revenues that were reported in error.

3. Netelligent Corporation has initiated the process of making VPS' recommended changes upon issuance of the Audit Report, however, the Company has not been able to process the recommended changes in it's billing system and to issue the required refunds within 60-days from the date of the Commission's Order.

4. Billing system changes, and any refunds that ensue, require a substantial amount of time to fully implement. Taxation updates to a product catalog within the billing software may lag as many as 90 days, which is a system limitation that prevents Netelligent Corporation from fulfilling the Commission's orders within a 60-day period.

5. Accordingly, Netelligent Corporation requests an extension of time of its 60-day deadline for the enumerated tasks set forth in paragraph 2 of this petition. The Company anticipates completing these tasks no later than November 30, 2024. Netelligent Corporation posits that it is logical for VPS to also be granted an extension of its 90-day Compliance Report to 30 days after the November 30, 2024 deadline.

WHEREFORE Netelligent Corporation respectfully requests an extension of the 60-day deadline set for in its May 10, 2024 Order Adopting Audit Report and requests that the Commission order Netelligent to (1) File audit True-Ups for FYs 25,26, and 27 to exclude Fax IP service revenues and Local Number Portability for Existing Numbers revenues from its reporting, and to correct the revenues for the July 2022 reporting period that were originally filed in error; (2) Issue one-time billing credits in the amount of \$2,922.75 to its affected customers, on a pro-rata basis; (3) Update its billing system to exclude KUSF surcharge collection from Fax IP services and Local Number Portability for Existing Number charges; (4) Update its KUSF reporting procedures to exclude reporting of FAX IP service revenues and Local Number Portability for Existing Number charges; (5) Provide VPS with four (4) customer bills supporting that the refund process has been completed; and (6) File the required affidavit no later than November 30, 2024.


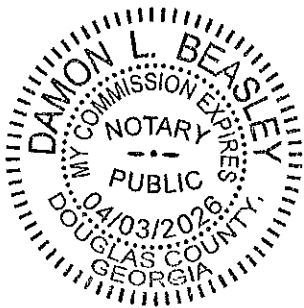
Respectfully submitted,

CliftonLarsonAllen LLP



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I, Orvin Moore, Attorney-in-Fact of Netelligent Corporation, verify that the foregoing Motion for Extension of Time is true and correct to the best of my knowledge and information. Executed on August 22, 2024.



Orvin Moore

Date: 08/22/2024

Subscribed and sworn to before me this 22nd day of August, 2024.

My Commission expires: 4-3-2026



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Motion for Extension of Time was served via electronic service this August 22, 2024, to the parties appearing on the Commission's service list (last modified May 10, 2024).

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