



August 16, 2016

Ms. Amy Green
Secretary of the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

RE: Docket No. 16-GIMT-511-GIT
CenturyLink's REVISED Compliance Filing on CAF II and KUSF Support

Dear Ms. Green:

On June 30, 2016, CenturyLink filed with the Commission its compliance filing on CAF II and KUSF support pursuant to the Commission's May 24, 2016 Opening Order in Docket No. 16-GIMT-511-GIT. Enclosed with this filing is CenturyLink's revised filing after ongoing discussions with Staff.

In its May 24, 2016 Opening Order, the Commission directed CenturyLink in Ordering Paragraph A to file (A) its proposed model, (B) its revised CAF II support, (C) the 2015 enabled locations reported to the FCC, and (D) its preliminary 2016 enabled data by July 1, 2016. CenturyLink made the required compliance filing on June 30, 2016 and labeled the individual elements of its filing as Attachment A, B, C and D, respectively.

This filing by CenturyLink includes modifications to Attachment A and Attachment B as outlined below:

- Attachment A – CenturyLink's proposed model. Based on feedback from Staff, CenturyLink slightly modified the proposed model to remove the "location adjustment" factor for the census blocks with 2015 enablements. CenturyLink is not suggesting that this is the appropriate method to incorporate enabled locations into the model on a go-forward basis; however, given the few number of 2015 impacted census blocks and the time constraints this approach is the most effective for the current refresh. This file was initially provided to Staff on July 19, 2016 and CenturyLink considers the model to be confidential data.
- Attachment B – CenturyLink's revised KUSF Support. CenturyLink's revised KUSF support figure is the result of the model in Attachment A. The revised KUSF support amount differs by \$3,939 from the initial model in the 16-GIMT-067-GIT docket as a result of (1) a giveback of 2% of eligible CAF II locations in December 2015 in accordance with the FCC's CAF II program and (2) 2015 enabled locations. CenturyLink considers Attachment B to be public data.

CenturyLink considers Attachments A of this filing to be confidential and of commercial value, and it has not been made public. This document is filed pursuant to K.S.A. 66-1220a, and CenturyLink asks the Commission to accord the same confidentially status under those provisions. CenturyLink has filed both a redacted and non-redacted version of its filing.




If you have any questions concerning this matter, please contact me.




Yours appreciatively,

A handwritten signature in black ink, appearing to read "John Idoux". The signature is fluid and cursive, with the first name "John" and last name "Idoux" clearly distinguishable.

John R. Idoux
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Calculation of CenturyLink's Revised KUSF Year#20 Support Amount Resulting From Changed Federal Offset

INITIAL RESULTS					
	Year20 Approved (1)		Year20 Revised Proposal (2)	Difference	
Gross High Cost	\$ 12,822,601		\$ 12,822,601	\$ -	
Federal Offset	\$ (3,113,630)	<i>from model</i>	\$ (3,104,343)	\$ 9,287	
NET HIGH COST	\$ 9,708,971		\$ 9,718,258	\$ 9,287	
Gross Access	\$ 1,314,835		\$ 1,314,835	\$ -	
Access True up	\$ (79,290)		\$ (79,290)	\$ -	
NET ACCESS	\$ 1,235,545		\$ 1,235,545	\$ -	
Qualifying KUSF	\$ 10,944,516		\$ 10,953,803	\$ 9,287	\$ 5,348
Cap	\$ 11,400,000		\$ 11,400,000		
Total KUSF	\$ 10,944,516		\$ 10,953,803	\$ 9,287	

REVISED RESULTS					
	Year20 Approved (1)		Year20 Revised Proposal (2)(3)	Difference	
Gross High Cost	\$ 12,822,601		\$ 12,822,601	\$ -	
Federal Offset	\$ (3,113,630)	<i>from model</i>	\$ (3,109,691)	\$ 3,939	
NET HIGH COST	\$ 9,708,971		\$ 9,712,910	\$ 3,939	
Gross Access	\$ 1,314,835		\$ 1,314,835	\$ -	
Access True up	\$ (79,290)		\$ (79,290)	\$ -	
NET ACCESS	\$ 1,235,545		\$ 1,235,545	\$ -	
Qualifying KUSF	\$ 10,944,516		\$ 10,948,455	\$ 3,939	
Cap	\$ 11,400,000		\$ 11,400,000		
Total KUSF	\$ 10,944,516		\$ 10,948,455	\$ 3,939	

Notes:

- (1) Year20 approved amounts from Docket No. 16-GIMT-067-GIT for 6 months until revised model available
- (2) Commission's Order in the 16-511 Docket directed CenturyLink to file its revised KUSF support amount
- (3) Revised calculation as of July 19 to reflect 2015 enabled locations