

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

In the Matter of the Audit of GC Pivotal, LLC)
By the Kansas Universal Service Fund (KUSF))
Administrator Pursuant to K.S.A. 66-2010(b)) Docket No. 24-GCPT-115-KSF
For KUSF Operating Year 25, Fiscal Year)
March 2022-February 2023.)


DECLARATION OF DOUGLAS RICHARDS

I am Vice President of GC Pivotal, LLC and authorized to provide this affidavit on its behalf, and the facts set forth herein are true and correct to the best of my knowledge.

As of the date of this Declaration, GC Pivotal, LLC has:

1. corrected its KUSF reporting procedures to include POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees in its reporting revenues;
2. corrected its KUSF reporting procedures to exclude Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges from its reporting revenues;
3. corrected its billing system to include KUSF surcharge collection from POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-Listed Fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees;
4. corrected its billing system to exclude KUSF surcharge collection from Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges;
5. remitted \$6,812.65 to the KUSF, which it did on August 30, 2024;
6. filed true-up reports for Fiscal Years (FY) 25, 26 and 27;
7. filed the true-up report for FY 28 (March 2024 – February 2025) and calculated an additional true-up amount of \$2,270.88 due to the KUSF for FY 28;
8. taken steps to ensure that \$2,270.88 will be remitted to the KUSF on or before June 16, 2025; and
9. filed a revised Carrier Remittance Worksheet (CRW) for March 2025.

[signature page follows]



Name: Douglas Richards

Date: 5-16-25

Subscribed and sworn to before me this 16 day of MAY, 2025.

My Commission expires: July 31, 2026 Michele McNeill
Notary

Commonwealth of Virginia
City/County of Fairfax

I certify this to be a complete, full, true and exact reproduction of the original document.

Certified this 16 day of May, 2025

Notary Signature Michele McNeill
Registration # 7955016 Expires July 31, 2026

MICHELE ELAINE MCNEILL, Notary Public

CERTIFICATE OF SERVICE

I, Leetal Weiss, certify that a true copy of the attached Declaration of Douglas Richards has been served to the following by means of electronic service on May 16, 2025.

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CERTIFICATE OF SERVICE

24-GCPT-115-KSF

/s/ Leetal Weiss
Leetal Weiss