

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

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

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.)

ORDER OPENING DOCKET

This matter comes before the State Corporation Commission of the State of Kansas (“Commission”) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

1. The Federal Communications Commission (“FCC”), in its *USF/ICC Transformation Order & FNPRM*, requires Eligible Telecommunications Carriers (ETCs) to submit specific information as outlined in 47 C.F.R. § 54.313, to the states, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1 of each year, beginning in the year 2012.¹

2. The Commission believes that this docket should be opened to collect those filings, as required by the FCC, and to determine whether the Commission should certify that the ETCs in Kansas will use their federal Universal Service Fund (USF) support for 2025 in compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and whether the ETCs appropriately

¹ *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, *Third Order on Reconsideration*, (May 14, 2012), ¶ 10.

used their federal USF and Kansas Universal Service Fund (KUSF) support in 2023. States that desire ETCs to receive support pursuant to the USF high-cost program must file an annual certification with the FCC and USAC by October 1, stating that all federal high-cost support provided to such carriers within the state was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support was intended as required by 47 C.F.R. § 54.314.

3. Commission Staff (“Staff”) prepared a Report and Recommendation, dated March 13, 2024, which is attached hereto and made a part hereof by reference. The Report and Recommendation addresses the above stated matters and requests the Commission open this docket. The Commission approves Staff’s Report and Recommendation and adopts the request.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. This docket shall be opened for the purpose of receiving information and certifications to ensure compliance with 47 U.S.C. § 254(e) and to ensure appropriate use of federal USF and KUSF support.

B. The required ETC certifications, along with the attached worksheet(s), shall be filed with the Commission in this docket on or before June 28, 2024. Refer to Staffs R&R to determine which filings need to be made by which entities and how to report the information. Note that copies of the supporting Excel files for Attachments 2-4 should be e-mailed to s.garrett@kcc.ks.gov and h.bhagat@kcc.ks.gov, concurrent with the filing in the docket. The annual "ETC Certification Files" may be downloaded from the Commission's website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>. ETCs are reminded that late or incomplete filings may result in fines or penalties.

C. ETCs that received high-cost KUSF support in 2023 should use the Annual Total amount of support listed for the carrier on Staff Exhibit 1. If an ETC believes it should report a

different number, it should contact Staff to discuss the matter. If an ETC reports a different number, it needs to explain why the different amount was used and why it differs from the amount on Staff Exhibit 1.

D. ETCs are to certify all federal high-cost support receipts, therefore, to ensure Staff's review and the Commission's decisions regarding certification meet the obligation to certify all federal high-cost support, an ETC should report all federal high-cost support (i.e., ACAM) and not allocate its federal high-cost support. Staff's review and recommendations regarding ETC certification take into consideration that federal high-cost support may be provided for both voice and broadband services.

E. ETCs are reminded that any information filed confidentially shall comply with K.A.R. 82-1-221a. This includes K.A.R. 82-1-221a(a)(5)'s requirement of a written explanation explaining whether the information constitutes a trade secret or confidential commercial information, and an explanation regarding the harm or potential harm disclosure would cause. Failure to comply with such regulation may result in a penalty or public disclosure of information

F. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).²

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

² K.S.A. 66-118b; K.S.A. 77-503(c); and K.S.A. 77-531(b).

Dated: 03/21/2024

Lynn M. Retz

Lynn M. Retz
Executive Director

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**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

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

FROM: Steve Garrett, Deputy Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: March 13, 2024

SUBJECT: Docket No. 24-GIMT-612-GIT

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support.

EXECUTIVE SUMMARY:

The Federal Communications Commission (FCC) requires Eligible Telecommunications Carriers (ETCs) to submit specific information, set forth in 47 C.F.R. § 54.313, to the States, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1st of each year.¹ In addition, pursuant to 47 C.F.R. § 54.314 and 47 U.S.C. § 254(e), States that desire to have ETCs in their state receive funding pursuant to the federal high-cost program must file an annual certification with USAC and the FCC. This filing states that all federal high-cost support provided to such carriers within Kansas was used in the preceding calendar year and will be used in the following calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Staff recommends the Commission open a docket to collect the required filings by the ETCs and to determine whether the Commission should provide the aforementioned federal high-cost certification letter to the FCC and USAC. An ETC should also include a certification and information to ensure its Kansas Universal Service Fund (KUSF) support was used in the preceding calendar year (2023) and will be used in the coming calendar year (2025) appropriately.

¹ Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, (May 14, 2012), ¶ 10.

Each company must submit a separate filing, with a copy of the supporting Excel files for Attachments 2 - 4, emailed to Staff at s.garrett@kcc.ks.gov and h.bhagat@kcc.ks.gov, concurrent with the filing. The annual “ETC Certification Files” are available for download on the Commission’s website at the following web address: <https://kcc.ks.gov/telecommunications/service-provider-forms>. **Carriers should be reminded that late or incomplete filings may result in fines or penalties.**

BACKGROUND:

The Federal Telecommunications Act, § 254(e), requires that carriers receiving federal high-cost support shall use the support “*only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.*” (Emphasis added). The FCC delegated responsibility for oversight of § 254(e) to the States. The certification letter to the FCC and USAC, due no later than October 1, 2024.

For Kansas high-cost ETCs to be eligible to receive federal high-cost support in 2025. The Commission must send a letter to the FCC and USAC stating each ETC named in its letter provided certification that it used its federal high-cost support in the prior year (2023) and will use its federal high-cost support in the following year (2025) in accordance with § 254(e). Specifically, § 54.314(a), states,

States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that *all federal high-cost support* provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section. [Emphasis added].

Carriers are to certify all federal high-cost support receipts,² therefore, to ensure Staff’s review and the Commission’s decisions regarding certification meet the obligation to certify *all* federal high-cost support, an ETC should report all federal high-cost support (i.e. ACAM) and not allocate its federal high-cost support. Staff’s review and recommendations regarding ETC certification take into consideration that federal high-cost support may be provided for both voice and broadband services.³

For KUSF support certification purposes, the Commission requires an ETC provide information documenting that it appropriately spent its KUSF support and will continue to spend its KUSF

² Federal high-cost support includes: legacy support, safety valve support, Connect America Cost Model support, Connect America Fund support, Alternative Connect America Model support, Rural Broadband Experiment support, and Rural Digital Opportunity Fund support. Any ETC that will receive RDOF support in 2024 and/or 2025 must certify the receipt and use of the support.

³ This Docket is to address the annual certification of an ETC’s federal high-cost support. Staff’s recommendation for an ETC to report all federal high-cost support for certification purposes is not intended to address whether or, how, an ETC’s federal high-cost support should be treated in a company-specific proceeding. The rural Local Exchange Carriers (RLECs) filed a request for the Commission to open a docket to address federal high-cost support allocations in Docket No. 23-GIMT-392-GIT.

support appropriately.⁴

ANALYSIS:

Kansas ETC Certification Forms

The Forms and Instructions ETCs will use to certify their Federal and Kansas high-cost support are as follow:

Attachment

<u>No.</u>	<u>Description</u>
1	Certification Form for federal High-Cost and KUSF Support
2a	Kansas' Test for Certification for Incumbent Local Exchange Carriers (ILECs)
2b	Kansas' Test for Certification for ILECs - Illustrative Data
3a	Kansas' Test for Certification for Competitive ETCs
3b	Kansas' Test for Certification for Competitive ETCs - Illustrative Data
4	Narrative Report for New Investments
5	Additional ETC Requirements Adopted in Docket No. 06-GIMT-446-GIT
6	Certification Instructions

Attachment 6 contains the Instructions for completing Attachments 1-5.

- ILECs that received in 2023 and/or will receive federal high-cost support and/or KUSF support in 2025 should complete Attachments 1, 2a, 4, and 5.
- Competitive ETCs that received high-cost support in 2023 and/or will receive federal high-cost support in 2025 need to complete Attachments 1, 3a, 4, and 5.
- Lifeline-Only ETCs need to complete only Attachment 5.

Attachments 2b and 3b are provided for illustration purposes only to assist in the completion of the cost reports in 2a and 3a. Additionally, since Competitive ETCs are eligible to receive federal high-cost support in Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T) exchanges, a Competitive ETC will need to include and certify any federal high-cost support received for AT&T's exchange on Attachments 3a and 4.⁵

Staff notes that in the past,⁶ many ETCs reported the net amount of KUSF received after deducting its assessments owed to the Fund. An ETC's statutory requirement to contribute to the KUSF is separate and distinct from its Kansas high-cost support and, therefore, the gross amount of KUSF support received should be reported on Attachments 2a and 3a.

⁴ Order Adopting Staff Workshop Report and Issue Resolutions and Soliciting Additional Comments, Docket No. 08-GIMT-154-GIT, Jan. 30, 2009.

⁵ The Commission's Order, Docket No. 07-GIMT-498-GIT, dated Aug. 9, 2007, reaffirmed its previous decision not to certify competitive ETCs' expenditures and investments of federal legacy high-cost support in non-supported areas, which were areas served by AT&T, except to the extent the competitive ETCs can justify an allocation of a portion of expenditures and investments of federal high-cost support to serve a supported area. The federal high-cost Connect America Fund and Rural Digital Opportunity Fund provide support specifically for census blocks in AT&T's and Brightspeed's service area; therefore, expenses and investments related to that funding must be reported.

⁶ See Docket No. 18-GIMT-394-ETC.

Staff Exhibit 1 includes the amount of high-cost KUSF support disbursed to each ETC in 2023. This amount should be reported as the amount of KUSF high-cost support received in 2023. If the carrier believes a different amount should be reported, it should contact Staff.

RECOMMENDATION:

Staff recommends the Commission open a docket to collect the required filings and to determine whether the Commission should certify to the FCC and USAC that all federal high-cost support provided to ETCs in Kansas was used in the preceding calendar year (2023) and will be used in the coming calendar year (2025) in accordance with Section 254(e). The docket should further include a certification and analysis to ensure KUSF support was used in 2023 and will be used in 2025 appropriately.

Staff further recommends all ETCs download the annual “ETC Certification Files” that are available on the Commission’s website at the following web address: <https://kcc.ks.gov/telecommunications/service-provider-forms>. Staff recommends the Commission require ETCs and competitive ETCs to submit their ETC certifications and the required worksheets, on or before Friday, June 28, 2024. Each company are expected to submit a separate filing, with Attachments, and email a copy of the supporting Excel files, for Attachments 2-4 to s.garrett@kcc.ks.gov and h.bhagat@kcc.ks.gov. **Carriers should be reminded that late or incomplete filings may result in fines or penalties.**

EXHIBIT A

KUSF High-Cost Support Paid to ETCs
January - December 2023
(Annual total should match amount reported. Include explanation for any variance)

Company	Jan. - Dec. 2023 Annual Total (A = B + C + D)	Jan - Feb. 23 Total (FY 26) (B)	March - June 23 Total (FY 27) (C)	July - Dec. 23 Total (FY 27) (D)
Blue Valley	\$ 1,424,638	\$ 237,002	\$ 475,307	\$ 712,329
Columbus	324,611	54,634	108,004	161,973
Consolidated Communications of Kansas (1)	-	-	-	-
Consolidated Communications of Missouri (2)	-	-	-	-
Craw-Kan	4,057,468	677,108	1,352,603	2,027,756
Cunningham	763,148	126,881	254,545	381,722
Elkhart	126	126	-	-
Golden Belt	1,563,058	260,576	521,130	781,352
Gorham	487,307	80,973	162,558	243,776
H & B	607,097	100,880	202,525	303,691
Haviland	-	-	-	-
Home	487,168	81,733	162,932	242,503
JBN	540,412	90,292	180,112	270,009
KanOkla	605,514	100,978	201,892	302,644
LaHarpe	-	-	-	-
Madison	199,140	33,140	66,412	99,588
Mokan	-	-	-	-
Moundridge	-	-	-	-
Mutual	192,646	32,064	64,244	96,338
Peoples	429,128	71,456	143,088	214,583
Pioneer	3,143,583	523,882	1,048,013	1,571,688
Rainbow	686,860	116,014	228,456	342,390
Rural	2,327,899	388,074	776,028	1,163,797
S & A	305,432	50,863	101,846	152,722
S & T	1,041,303	173,225	347,291	520,787
South Central	202,076	33,765	67,367	100,943
Southern Kansas	1,049,049	175,043	348,404	525,603
Totah	206,739	34,516	68,898	103,325
Tri-County	1,164,136	193,703	388,249	582,184
Tri-County - Council Grove	850,596	141,584	283,664	425,347
Twin Valley	3,080,852	511,936	1,027,697	1,541,220
United Telephone Assoc.	1,409,667	235,458	469,762	704,447
Wamego	1,405,941	233,713	468,951	703,277
Wheat State	538,131	89,620	179,525	268,985
Wilson	644,105	107,108	214,830	322,166
Zenda	262,659	43,655	87,613	131,390
Brightspeed of Kansas (3)	7,420,854	1,505,904	2,365,980	3,548,970
	<u>\$ 37,421,340</u>	<u>\$ 6,505,904</u>	<u>\$ 12,367,928</u>	<u>\$ 18,547,508</u>

Notes:

- (1) Effective January 1, 2019, Bluestem Telephone and Sunflower Telephone Company's names were changed to Consolidated Communications of Kansas, Docket No. 19-SFLT-197-CCN.
- (2) FairPoint-MO changed its name to Consolidated Communications of Missouri, effective January 1, 2019. Docket No. 19-FCMT-161-CCN.
- (3) Reflects KUSF support paid to Brightspeed. Includes prior year KUSF & CAF Support adjustments paid during the year. Docket No. 16-GIMT-511-GIT

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 _____ of
_____ (Company/Cooperative). 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 _____ (Company/Cooperative) to the statements
made in this certification.

2. _____ (Company/Cooperative) was named as
an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal
support purposes in Docket No. _____ by order dated
_____ and KUSF support purposes in Docket No. _____ by order
dated _____.

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

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 _____ (Company/Cooperative) 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.)

Signature

Printed/Typed Name

Executed on _____ date.

Email address: _____

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: _____		
DATA YEAR: <u>2023</u>		
	<u>LINE</u>	<u>REGULATED AMOUNT</u>
WORKING LOOPS		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
3. Consumer Broadband-only Loops	(090)	
 INVESTMENT** Remove all BLS only investments		
1. Plant Accounts		
a. Acct 2001 - Telephone Plant in Service	(160)	
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	
b. Acct 2220 - Operator System Equipment	(235)	
c. Acct 2230 - Central Office Transmission	(240)	
d. Total Central Office Equip	(245)	\$ -
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410 - Cable & Wire Facilities Total	(255)	
 AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 - Tangible Assets	(800)	\$ -
Acct. 2680 (2230) - Central Office Transmission	(805)	
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	
Acct. 2680 (2410) Cable & Wire Facilities	(815)	
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
 PART 36 - COST STUDY DATA		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		#DIV/0!
4. COE CAT 4.13 Factor		#DIV/0!
5. Switching Factor		1.000000

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

24-GIMT-612-GIT
Attachment 2a

Company Name: _____

DATA YEAR: 2023

For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year

INVESTMENT, EXPENSE AND TAXES**	LINE	REGULATED AMOUNT
Remove all BLS only amounts		
1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 - Cable & Wire Facilities Total	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	
b. Acct 6110 - Network Support Benefits	(340)	
c. Acct 6110 - Network Support Rents	(345)	
d. Acct 6120 - General Support Total	(350)	
e. Acct 6120 - General Support Benefits	(355)	
f. Acct 6120 - General Support Rents	(360)	
g. Acct 6210 - Central Office Switching Total	(365)	
h. Acct 6210 - Central Office Switching Benefits	(370)	
i. Acct 6210 - Central Office Switching Rents	(375)	
j. Acct 6220 - Operator Systems Total	(380)	
k. Acct 6220 - Operator Systems Benefits	(385)	
l. Acct 6220 - Operator Systems Rents	(390)	
m. Acct 6230 - Central Office Transmission Total	(395)	
n. Acct 6230 - Central Office Transmission Benefits	(400)	
o. Acct 6230 - Central Office Transmission Rents	(405)	
p. Total - Central Office (Acct. 6210 - 6230)	(410)	\$ -
q. Acct 6410 - Cable & Wire Facilities	(430)	
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	
t. Total Plant Specific Expense (Accts. 6110 - 6410)	(445)	\$ -
3. Expenses - Plant Non Specific Exp		
a. Acct 6530 - Network Operations	(450)	
b. Acct 6530 - Network Operations Benefits	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210) - Central Office Switching	(510)	
b. Acct 6560 (#2220) - Operator Systems	(515)	
c. Acct 6560 (#2230) - Central Office Transmission	(520)	
d. Acct 6560 (#2210-2230) - Total	(525)	\$ -
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)	
5. Corporate Operating Expenses		
a. Acct 6710 - Executive & Planning	(535)	
b. Acct 6710 - Executive & Planning Benefits	(540)	
c. Acct 6720 - General Admin	(550)	
d. Acct 6720 - General Admin Benefits	(555)	
e.Total Corporate Operating Expense (line 535+550)	(565)	\$ -
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	-
Total Expenses (Excluding Depreciation)		\$ -
7. Operating Taxes		
a. Acct 7200	(650)	

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: _____	
DATA YEAR: 2023	
Test for use of FUSF & KUSF	
CAPITAL:	
1. Category 1 C&WF	#DIV/0!
2. Category 4.13 COE and Switching	#DIV/0!
MAINTENANCE:	
3. CWF - MAINT. EXP.	#DIV/0!
4. COE - MAINT. SW	-
5. COE - MAINT-OP SYSTEM	-
6. COE - MAINT. - TRANS.	#DIV/0!
7. CWF - NETWORK SUPPORT	#DIV/0!
8. COE - NETWORK SUPPORT	#DIV/0!
9. CWF GENERAL SUPPORT	#DIV/0!
10. COE GENERAL SUPPORT	#DIV/0!
20. CWF NETWORK OPERATION	#DIV/0!
21. COE NETWORK OPERATION	#DIV/0!
22. CWF EXEC. & PLANNING	#DIV/0!
23. COE EXEC. & PLANNING	#DIV/0!
24. CWF GENERAL ADMIN.	#DIV/0!
25. COE GENERAL ADMIN.	#DIV/0!
26. CWF OPERATING TAXES	#DIV/0!
27. COE OPERATING TAXES	#DIV/0!
28. CWF BENEFITS - TTL OPER EXP	#DIV/0!
29. COE BENEFITS - TTL OPER EXP	#DIV/0!
30. CWF RENTS - TTL OPER EXP	#DIV/0!
31. COE RENTS - TTL OPER EXP	#DIV/0!

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: _____			
DATA YEAR: 2023			
A. Total Cash Expenditures Associated with USF	#DIV/0!		
B. Certified Federal USF Receipts:			
B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)	\$	-	
B2. Safety Valve Support for acquired Exch. (SVS)		-	
B3. Alternative Connect America Model (ACAM/ACAM II)		-	
B4. Connect America Fund, Phase I, II (CAF I/CAF II)		-	
B5. Rural Digital Opportunity Fund, Phase I (RDOF I)		-	
B6. Rural Broadband Experiment (RBE)		-	
B7. Total Federal USF Receipts	\$	-	
C. Gross KUSF Receipts (do not deduct KUSF assessments paid)	\$	-	
D. Total FUSF and KUSF Receipts	\$	-	
E. Do Expenditures Exceed FUSF Receipts?	#DIV/0!		
Amount Expenditures Exceed Certified FUSF		#DIV/0!	[A - B8]
<i>(negative number means FUSF exceeds Expenditures)</i>			
F. Do Expenditures Exceed FUSF & KUSF Receipts?	#DIV/0!		
Amount Expenditures Exceed Certified FUSF & KUSF		#DIV/0!	[A - D]
<i>(negative number means FUSF & KUSF exceeds Expenditures)</i>			
Please provide the following information:			
	Contact:	_____	
	Title:	_____	
	Phone No.:	_____	
	E-Mail:	_____	

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

Company Name: ABC Telephone Company Inc.

	DATA YEAR	2023
	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	9,552
2. Category 1.3 Loops	(070)	9,262
3. Consumer Broadband-only Loops	(090)	500
INVESTMENT** Remove all BLS only investments		
1. Plant Accounts		
a. Acct 2001	(160) \$	26,978,955
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	5,247,838
b. Acct 2220 - Operator System Equipment	(235)	0
c. Acct 2230 - Central Office Transmission	(240)	5,962,811
d. Total Central Office Equip	(245) \$	11,210,649
e. Circuit Equip Cat 4.13	(250)	4,061,618
f. Acct 2410 - Cable & Wire Facilities Total	(255)	13,819,015
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 - Tangible Assets	(800)	0
Acct. 2680 (2230) - Central Office Transmission	(805)	0
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	0
Acct. 2680 (2410) Cable & Wire Facilities	(815)	0
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	0
Acct. 6560 (2680) Dep & Amort	(830)	0
PART 36 - COST STUDY DATA		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	11,811,817
2. Cost Study Avg C&WF Cat 1	(710)	11,718,782
3. C&WF CAT 1 Factor		0.992124
4. COE CAT 4.13 Factor		0.362300
5. Switching Factor		1.000000

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

Company Name: ABC Telephone Company Inc.

DATA YEAR 2023
REGULATED
LINE AMOUNT

For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year

INVESTMENT, EXPENSE AND TAXES**	LINE	REGULATED AMOUNT
Remove all BLS only amounts		
1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	198,228
b. Total Central Office Equip	(245)	480,061
c. Acct 2410 - Cable & Wire Facilities Total	(255)	436,274
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	12,628
b. Acct 6110 - Network Support Benefits	(340)	1,362
c. Acct 6110 - Network Support Rents	(345)	256
d. Acct 6120 - General Support Total	(350)	211,447
e. Acct 6120 - General Support Benefits	(355)	8,068
f. Acct 6120 - General Support Rents	(360)	15,114
g. Acct 6210 - Central Office Switching Total	(365)	236,427
h. Acct 6210 - Central Office Switching Benefits	(370)	36,157
i. Acct 6210 - Central Office Switching Rents	(375)	2,922
j. Acct 6220 - Operator Systems Total	(380)	0
k. Acct 6220 - Operator Systems Benefits	(385)	0
l. Acct 6220 - Operator Systems Rents	(390)	0
m. Acct 6230 - Central Office Transmission Total	(395)	108,923
n. Acct 6230 - Central Office Transmission Benefits	(400)	14,821
o. Acct 6230 - Central Office Transmission Rents	(405)	1,222
p. Total - Central Office (Acct. 6210 - 6230)	(410)	\$ 345,350
q. Acct 6410 - Cable & Wire Facilities	(430)	882,320
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	124,429
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	63,079
t. Total Plant Specific Expense (Accts. 6110 - 6410)	(445)	\$ 1,451,745
3. Expenses - Plant Non Specific Exp		
a. Acct 6530 - Network Operations	(450)	287,767
b. Acct 6530 - Network Operations Benefits	(455)	45,519
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210) - Central Office Switching	(510)	382,435
b. Acct 6560 (#2220) - Operator Systems	(515)	0
c. Acct 6560 (#2230) - Central Office Transmission	(520)	297,063
d. Acct 6560 (#2210-2230) - Total	(525)	679,498
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)	677,375
5. Corporate Operating Expenses		
a. Acct 6710 - Executive & Planning	(535)	73,579
b. Acct 6710 - Executive & Planning Benefits	(540)	17,078
c. Acct 6720 - General Admin	(550)	428,472
d. Acct 6720 - General Admin Benefits	(555)	46,933
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ 502,051
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	425,974
b. Rents Portion	(610)	82,594
Total Expenses (Excluding Depreciation)		\$ 2,241,563
7. Operating Taxes		
a. Acct 7200	(650)	1,073,834

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

Company Name: <u>ABC Telephone Company Inc.</u>	
DATA YEAR	<u>2023</u>
LINE	REGULATED AMOUNT
Test for use of FUSF and KUSF	
CAPITAL:	
1. Category 1 C&WF	432,838
2. Category 4.13 COE and Switching	455,759
MAINTENANCE:	
3. CWF - MAINT. EXP.	689,340
4. COE - MAINT. SW	197,348
5. COE - MAINT-OP SYSTEM	0
6. COE - MAINT. - TRANS.	63,266
7. CWF - NETWORK SUPPORT	5,595
8. COE - NETWORK SUPPORT	3,799
9. CWF GENERAL SUPPORT	95,673
10. COE GENERAL SUPPORT	64,963
20. CWF NETWORK OPERATION	123,106
21. COE NETWORK OPERATION	83,591
22. CWF EXEC. & PLANNING	28,713
23. COE EXEC. & PLANNING	19,496
24. CWF GENERAL ADMIN.	193,891
25. COE GENERAL ADMIN.	131,655
26. CWF OPERATING TAXES	545,701
27. COE OPERATING TAXES	370,541
28. CWF BENEFITS - TTL OPER EXP	216,472
29. COE BENEFITS - TTL OPER EXP	146,988
30. CWF RENTS - TTL OPER EXP	41,973
31. COE RENTS - TTL OPER EXP	28,500

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

Company Name: <u>ABC Telephone Company Inc.</u>			
		DATA YEAR <u>2023</u>	
LINE		REGULATED AMOUNT	
A. Total Cash Expenditures Assd with USF		\$ 3,939,208	
B. Certified Federal USF Receipts:			
B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)	\$	-	
B2. Safety Valve Support for acquired Exch. (SVS)		-	
B3. Alternative Connect America Model (ACAM/ACAM II)		2,000,000	
B4. Connect America Fund, Phase I, II (CAF I/CAF II)		-	
B5. Rural Digital Opportunity Fund, Phase I (RDOF I)		-	
B6. Rural Broadband Experiment (RBE)		-	
B7. Total Federal USF Receipts		<u>\$ 2,000,000</u>	
C. Gross KUSF Receipts (do not deduct KUSF assessments paid)		1,000,000	
D. Total FUSF and KUSF Receipts		<u>\$ 3,000,000</u>	
E. Do Expenditures Exceed FUSF Receipts?		Yes	
Amount Expenditures Exceed Certified FUSF		\$ 1,939,208	[A - B8]
<i>(negative number means FUSF exceeds Expenditures)</i>			
F. Do Expenditures Exceed FUSF & KUSF Receipts?		Yes	
Amount Expenditures Exceed Certified FUSF & KUSF		939,208	[A - D]
<i>(negative number means FUSF & KUSF exceeds Expenditures)</i>			
Please provide the following information:			
		Contact: <u>John Smith</u>	
		Title: <u>Accountant</u>	
		Phone No.: <u>785-555-1234</u>	
		E-Mail: <u>jsmith@wtci.com</u>	

**Competitive ETC Investment and Expense
Test for USF Certification**

**24-GIMT-612-GIT
Attachment 3a**

Company Name : _____

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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	AMOUNT FOR KANSAS A	ALLOCATION PERCENT B	CODE (see Notes) C	FUSF
				AMOUNT FOR FUSF AREAS D=AxB <i>(INCLUDE SWBT/AT&T Area if support is received for the area)</i>
FUSF WORKING LOOPS/LINEAverage 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? <i>(negative number means FUSF exceeds Expenditures)</i>	No			\$ -

- 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: _____ Title: _____

Phone No.: _____ E-Mail: _____

**Example
CETC Investment and Expense
Test for USF Certification**

Company Name : **Everyday Telephone Company, Inc.**

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. If your Company does not have "lines/loops", please provide the average number of customers for the year. 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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	AMOUNT FOR KANSAS	ALLOCATION PERCENT	CODE (see Notes)	FUSF
				AMOUNT FOR FUSF AREAS (INCLUDE SWBT/AT&T Area if support is received for the area) D=AxB
	A	B	C	D=AxB
FUSF WORKING LOOPS/LINES/CUSTOMERS	50,000	N/A		17,500
NEW INVESTMENTS:				
1. SWITCHING	5,000,000	35.00%	a	1,750,000
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)	7,000,000	62.00%	b	4,340,000
SUBTOTAL NEW INVESTMENTS [Should equal new investments, Attachment 4]	12,000,000			6,090,000
EXPENSES:				
3. SWITCH MAINTENANCE	1,500,000	75.00%	a	1,125,000
4. OUTSIDE PLANT MAINTENANCE	4,000,000	52.00%	c	2,080,000
5. NETWORK SUPPORT	500,000	52.00%	c	260,000
6. ADMINISTRATIVE EXPENSE	400,000	75.00%	a	300,000
SUBTOTAL EXPENSES	6,400,000			3,765,000
A. TOTAL CASH EXPENDITURES ASSD WITH USF	18,400,000			9,855,000
B. CERTIFIED FUSF RECEIPTS FOR CETCS				
B1. Frozen High Cost Support	\$ 83,500	100%		83,500
B2. Mobility Fund Support				
B3. Rural Broadband Experiments Fund				
B4. CAF II Support				
B5. Rural Digital Opportunity Fund, Phase I				
B6. Total Certified Federal USF Receipts				\$ 83,500
C. DO EXPENDITURES EXCEED FUSF RECEIPTS? (negative number means FUSF exceeds Expenditures)			Yes	
	18,400,000			\$ 9,771,500

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: Robert Jones

Title: Accountant

Phone No.: 316-555-5555

E-Mail: rjones@edtc.com

Narrative Report for New Investments

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

Carrier Name: 0
Data Year: 2023

Supplemental
Pages

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

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)? **(Yes/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

(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.

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

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 _____ 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 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 _____ (date).

Signature

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 _____ of the _____
(Company/ Cooperative). 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 _____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/ Cooperative) 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 _____ (date).

Signature

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

(If necessary, please attach additional pages.)

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

The Kansas Corporation Commission (KCC) requires every Eligible Telecommunications Carrier (ETC) to complete the ETC certification forms as part of the annual ETC certification process.

If you have any questions, please contact the Telecommunications Division at s.garrett@kcc.ks.gov or h.bhagat@kcc.ks.gov.

1. Line Definitions:

Working Loops for federal High-Cost Supported Services

Provide the line counts by incumbent local exchange carrier (ILEC) study area or wire center that were reported to the Universal Service Administrative Company (USAC) for the same year as the cost data is reported. Category 1.3 loops and broadband only loops should be reported separately.

2. Attachments 2 and 3 – ILEC ETC and Competitive ETC Investment and Expense Reports

a. ILEC ETC Report Format

Attachment 2a is used by Incumbent ETCs to report their use of federal high-cost support receipts for the prior year. The report is a modified version of the cost information submitted to USAC for legacy high-cost support, with the prior year data used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually used to provide universal service in the supported areas for which the support was paid.¹ Support should be segregated by the type of federal high-cost support received. Include all federal high-cost support.

KUSF support is required to be certified and, similar to federal support, KUSF support must be used to provide and maintain universal service. **All Federal and KUSF high-cost support reported should reflect the gross amount, not the net amount received after deducting assessments owed to the Fund. Lifeline support receipts should not be included in the amount of high-cost support received. The high-cost KUSF amount listed on Staff Exhibit 1 should be reported for KUSF high-cost support.**

Attachment 2b is an example of how to complete Form 2a.

b. Competitive ETC (CETC) Report Format

Attachment 3a is used by CETCs to report their use of federal high-cost funds received in the prior year. Prior year data is used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually expended to provide

¹ Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

universal service in the supported areas for which the support was paid.² If no universal service support was received for the prior year, the company should file a statement to that effect. Cost information is split by new investment expenditures and expenses. This is compared to the amount of federal high-cost support received. **High-cost support reported should be the gross amount, not the net amount received after deducting assessments.**

Attachment 3b is an example showing how to complete Form 3a.

The company should exclude the cost of transport between switches to ensure consistent reporting with the costs submitted by the Incumbent ETCs. Once a call leaves the local switch, it is on the interoffice network and costs for those facilities are not included. The switch is the device that provides dial tone and/or switching the call to the proper location for termination. This can be a smart remote with stand-alone capability³ or a stand-alone/host switch.

c. Allocation Methods

The cost reports attempt to capture the cost to provide universal service and exclude certain types of investments and expenses. The FCC has deregulated some services, including voice messaging and inside wire; therefore, they should be excluded.

The allocation of new investments and expenses play an important role in properly identifying the costs associated with USF supported areas. Incumbent LECs utilize a series of allocation rules via Part 36 Separations Rules that are specific and documented. However, even ILECs may encounter situations where only a portion of their territory receives high-cost support.

CETCs may serve exchanges that are supported and areas that are not supported. Some costs may be specific to the supported area, while others may involve both areas. A number of valid methods are available to make these allocations. Below is a list of examples that will normally be acceptable in making allocations:

Outside plant projects –the supported areas’ allocations can be determined as follow:

1. Identify the specific costs in supported areas and assign it as a qualified cost.
2. Determine the number of lines in the supported area versus the total lines served by the facilities. Do not include broadband-only use lines.
3. Determine the geographic area in the supported area versus the total area served (this method is especially applicable to cellular towers).
4. Calculate the percent of miles on a cable that serves a supported area versus the total miles to all the areas.

²*Ibid.*

³ A smart remote with stand-alone capability is one that can still provide local calling even if its link to the host switch is severed.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

5. Calculate the percent of fiber strands or cable pair that go to a supported area versus the total strands in service.

Expenses may be allocated based on the allocation determined for the related investment, or based on a percentage of lines or customers in the supported areas.

Maintenance expense may be allocated based on the number of items being maintained that are in the supported areas.

Switching may be allocated using the following methods:

1. Calculate the percent of Minutes of Use (MOU) for the lines in the supported area versus all minutes.
2. Calculate the percent of lines in the supported area versus all lines served by the switch.
3. Similar allocations could apply to circuit equipment used for switched access.

General rules to follow when deciding on the allocation method:

1. Allocations may be calculated by individual investment location, by region or for the whole state.
2. Companies may decide which methods work best based on the accounting and network information they have available.
3. Methods can vary for different types of investment or expense.
4. The method is one that is appropriate for the item being allocated (i.e. MOU would be appropriate for a switch allocation but not for a loop).
5. The allocation is based on measurable data.
6. The method captures a reasonable cost of the investment and/or expense.
7. The company should maintain consistency in the allocation methods used from year to year when providing data to the Commission. This will avoid gaming the system and provide the ability to make comparisons from year to year.
8. When a company changes an allocation method, it should be noted in the data submission, complete with rationale explaining why this new method is more appropriate. Also, the company should provide a calculation of what effect the new allocation would have on the prior year's report.

4. Attachment 4 - New Investments Utilizing High-Cost Support in Supported Areas

a. Report Format

For the prior calendar year, provide a description of the new investments in supported areas where the high-cost support was used. Please use a format similar to the *Narrative for New Investment Report*. The first example is for a wireless ETC and the second example is for a wireline ETC. It is acceptable to submit a mechanized report if it contains the essential information. Any projects over the threshold should be listed separately. Those projects less than the threshold should be combined into one or more line items. See 3b below for the threshold.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

EXAMPLE of Narrative for New Investment Report

EXAMPLE of a WIRELESS COMPANY

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
20 miles West of Oakley serving USF areas: Levant, Winona, and Russell Springs.	New tower and fiber trunking.	\$300,000	70%	[1]	\$210,000
Wichita - Serves all customers in Kansas.	Switch Software Upgrade.	\$250,000	25%	[2]	\$50,000
TOTAL		\$550,000			\$260,000

NOTES

[1] Percent of the service area that is USF supported on geography served.

[2] Percent of switch that is USF supported based on lines served.

EXAMPLE of a WIRELINE COMPANY

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
Buffalo, Quincy, Toronto	Replaced OSP with digital line carrier and fiber feeder	\$1,250,000	100%	[1]	\$1,250,000
Eureka thru Hamilton, Quincy, Yates Center, Chanute, Fredonia, Fall River & serves USF areas: Buffalo, Toronto, Altoona, Benedict, and Coyville.	Fiber ring from remote terminals to remote switch in Eureka.	\$800,000	50%	[2]	\$400,000
TOTAL		\$2,050,000			\$1,650,000

NOTES

[1] All of the exchanges in this project are USF supported.

[2] Percent of lines served by the fiber ring in the USF supported exchanges.

The objective of this report is to identify that new investment is being spent to benefit supported areas. Listing individual exchanges that will benefit will help meet this purpose.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

b. Threshold - For companies spending less than \$10M in new projects in Kansas, use \$200,000 as the project threshold. For companies spending \$10M or more, use \$500,000 as the project threshold. It is acceptable to provide more detail than the threshold requires if it helps identify which supported areas are receiving benefit.

5. Attachment 5 - Annual Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT.

Provide the information requested on the Attachment. Attach additional pages, as necessary. All ETCs must complete Questions 1-6. Only Competitive ETCs need to complete Question 7. **If the answer to a question is zero, please report zero and not N/A.**

CERTIFICATE OF SERVICE

24-GIMT-612-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 03/21/2024.

MARK ALBERTYN, CEO
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malbertyn@wisperisp.com

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