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July 2, 2018

Ms. Lynn M. Retz
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Re: Docket 18-GIMT-394-GIT

Dear Ms. Retz,

We are enclosing the FCC Section 254(e) certification for Federal Universal Service Support in the above referenced docket for Cellular Network Partnership d/b/a Pioneer Cellular (CNP).

We are filing Attachments 3b and 4 proprietary and confidential under seal. Cellular Network Partnership believes that the information contained in Attachments 3b and 4 is of such competitive sensitivity that its disclosure to any person other than CNP, the Commission, and Staff is prohibited by K.S.A. 66-1220(a). Disclosure of trade secrets and confidential information to any person, including parties to this proceeding, is prohibited unless the Commission finds the disclosure is warranted, after considering all of the factors in that statute. The carrier believes that disclosure of the information contained in Attachments 3b and 4 would have a significant and adverse impact on its competitive stance regarding existing or potential competing entities including wireless carriers, competitive local exchange carriers, and incumbent local exchange carriers. Regulatorily mandated disclosure of any or all of the subject information would create a competitive bias in favor of any actual or potential competitor not required to provide comparable information, reducing or eliminating any benefit to consumers otherwise resulting from unbiased competition and damaging the submitting company's ability to engage in fair competition.

Please feel free to give me a call if you have any questions.

Very truly yours,



Mark E. Caplinger
Attorney for Cellular
Network Partnership
dba Pioneer Cellular

Enclosures
MEC/njm
Cc: Ron Comingdeer

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 General Manager of
Cellular Network Partnership (Company/ Cooperative). 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 Cellular Network Partnership (Company/Cooperative) to the statements
made in this certification.

2. Cellular Network Partnership (Company/Cooperative) was named as
an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support
purposes in Docket No. 06-CNPZ-1028-ETC Tele-CELL by order dated November 21, 2006
and KUSF support purposes in Docket No. N/A by order dated
N/A.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by
Cellular Network Partnership (Company/Cooperative) 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

Attachment 1

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.

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

Richard Ruhl

Printed/Typed Name

Executed on 5/23/2018 date.

Email address: raruhl@ptci.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).

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
	No outages affecting 10% or a 911 specialty facility.				

(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.

There were no unfilled requests for service in 2017.

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

1 complaint was filed in 2017.

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 General Manager of the Cellular Network Partnership
(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 Cellular Network Part (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cellular Network Part (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 5/23/2018 (date).



Signature

Richard Ruhl

Print / Typed Name

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 General Manager of the Cellular Network Partnership (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 Cellular Network Partnership (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cellular Network Partnership (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

5/23/2018 (date).



Signature

Richard Ruhl

Printed / Typed Name

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." Please complete the following:

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
See Attached Schedule			

(If necessary, please attach additional pages.)

Pioneer 2017 Kansas Advertising Expenditure

Campaign	Newspaper	Date	Amount	Geographic Area
CNP Lifeline	Anthony Republican	6/14/2017	141.65	Anthony, KS
CNP Lifeline	Attica Independent	6/15/2017	98.82	Attica, KS
CNP Lifeline	Caldwell Messenger	6/14/2017	113.65	Caldwell, KS
CNP Lifeline	Cedar Vale Lookout	6/15/2017	121.22	Cedar, KS
CNP Lifeline	Cheney Times Sentinel	6/15/2017	177.88	Cheney, KS
CNP Lifeline	Gyp Hill Premier	6/12/2017	148.24	Gyp, KS

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.

\$30 per month
Nationwide Coverage
Unlimited Talk and Text

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is General Manager of the Cellular Network Partnership (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding Cellular Network Partnership (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cellular Network Partnership (Company/ Cooperative) 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 5/23/2018 (date).



Signature

Richard Ruhl

Printed/Typed Name