

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

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

In the Matter of the Audit of BCI Telephone of)
Kansas, LLC by the Kansas Universal Service)
Fund (KUSF) Administrator Pursuant to) Docket No. 25-BCIV-103-KSF
K.S.A. 66-2010(b) for KUSF Operating Year)
27, Fiscal Year March 2023-February 2024.)

ORDER ADOPTING AUDIT REPORT

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (“Commission”) for consideration and determination. Having examined its files and record, and being duly advised in the premises, the Commission finds and concludes:

1. On August 6, 2024, the Commission directed Vantage Point Solutions (“VPS”) to perform an audit of Combined Public Communications, LLC (“CPC” or “Company”) for Kansas Universal Service Fund (“KUSF”) purposes.

2. On March 10, 2025, VPS filed its Audit Report for CPC regarding Operating Year 27 (March 2023–February 2024) that included the following findings:

Audit Finding No. 1:

The Company used the Fiscal Year 26 rate instead of the Fiscal Year 27 rate when collecting the KUSF surcharge from its customers for the period of March 2023. However, the result was immaterial.

Audit Finding No. 2:

The Company did not correctly fill out Box C of the Quarterly True-up for the second quarter of Fiscal Year 27 (June 2023 – August 2023), with no financial impact to the KUSF. The Company self-corrected this finding during the course of the audit.

3. VPS conducted the audit of CPC in accordance with the Commission’s KUSF Review Procedures. The Audit Report provides a detailed analysis to support the VPS findings and indicates (1) that CPC should file an affidavit, signed by an officer of the Company, attesting

that CPC has corrected its billing system to use the correct assessment rate for the appropriate fiscal year; and (2) that CPC has self-corrected its quarterly true-up during the course of the audit.

4. CPC operates as a provider of interexchange and operator services and is headquartered in Cold Spring, Kentucky. It has not been certificated as an Eligible Telecommunications Carrier (ETC) in Kansas. Therefore, it does not offer Lifeline services to its customers. Based on its review, VPS found CPC reports revenue and remits its assessment to the KUSF based on the unbundled service price for Kansas assessable revenue. It uses the same allocation methodology for federal Universal Service Fund purposes. CPC is current with its KUSF obligations.

5. The Commission, having reviewed VPS's Audit Report, filed March 10, 2025, finds that it should be adopted, including the recommendation that CPC be directed to take corrective actions within 30 days of the Commission's Order and VPS should file a Compliance Report in the above captioned docket within 60 days of this order.

IT IS THEREFORE, BY THE COMMISSION ORDERED THAT:

A. The Commission accepts and adopts Vantage Point Solutions' Audit Report filed March 10, 2025.

B. Combined Public Communications, LLC, shall file within 30 days of the issuance of this order an affidavit attesting that the company has corrected its billing system to use the correct assessment rate for the appropriate fiscal year.

C. VPS shall file a Compliance Report within 60 days of the issuance of this order.

D. 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).¹

¹ K.S.A. 66-118b; K.S.A. 77-503(c); and K.S.A. 77-531(b).

E. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further orders as it may deem necessary.

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 06/03/2025



Celeste Chaney-Tucker
Executive Director

BWB

CERTIFICATE OF SERVICE

25-BCIV-103-KSF

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 06/03/2025.

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brett.berry@ks.gov

DAWN CARTELLONE, ADMINISTRATIVE ASSISTANT
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
dawn.cartellone@vantagepnt.com

MARIE CENSOPLANO, SVP & GENERAL COUNSEL
BCI TELEPHONE OF KANSAS, LLC
4 INTERNATIONAL DRIVE
SUITE 330
RYE BROOK, NY 10573
marie.censoplano@vyvebb.com

WENDY HARPER, USF SERVICES MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
wendy.harper@vantagepnt.com

SHOMARI JACKSON
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
shomari.jackson@vantagepnt.com

DENNIS SMITH
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE STE B
SPRINGFIELD, IL 62704
dennis.smith@vantagepnt.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
nicole.stephens@vantagepnt.com

/S/ KCC Docket Room

KCC Docket Room