

until early the following week. At that time the company was obliged to contact its outside cost consultant to investigate the issue raised by Staff.

2. On August 7, the third business day after receipt of Staff's initial communication, Zenda provided to Staff a substantive response identifying the cause of the discrepancy cited. Zenda understands this response was satisfactory to resolve Staff's issue and enable review of the company's information. Staff then requested that a corrected Zenda filing be submitted.

3. Zenda understands that although Staff had been able to resolve prior carriers' corrections in this docket without the need for a formal corrected filing, this practice had become burdensome by the time Zenda's original filing was reviewed.

4. After reasonable time for prompt preparation of a corrected filing and after an intervening weekend Zenda submitted its corrected filing requested by Staff on August 13, 2019.

5. The time from Zenda management's actual awareness of Staff's contact, encompassing necessary outside research of Staff's inquiry and preparation and submission of a corrected filing encompassed some seven business days. The time required for the company to obtain and provide the corrected information for Staff's use was less than three full business days. These periods are reasonable for a particularly small telephone company like Zenda having few employees available to satisfy all operational responsibilities.

6. It is unreasonable and arbitrary particularly to assess any penalty for the period during which the company was unaware of any claimed shortcoming in its timely June 28 filing, as addressed in the referenced Columbus response. Further, upon receipt of the Staff inquiry the company acted promptly and diligently to ascertain and provide corrective information.

WHEREFORE Zenda Telephone Company urges that the Commission determine a penalty to be unreasonable and unwarranted in the foregoing circumstance.

Respectfully Submitted,

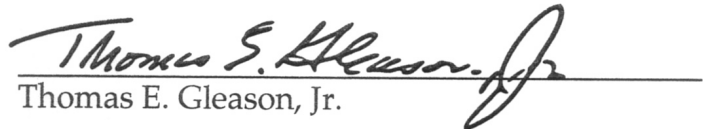


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VERIFICATION

STATE OF KANSAS, DOUGLAS COUNTY, ss:

Thomas E. Gleason, Jr., of lawful age, being first duly sworn, on his oath states: He is the attorney for Zenda Telephone Company; that he has read the above and foregoing Answer; that the statements, allegations and matters contained therein are true and correct.

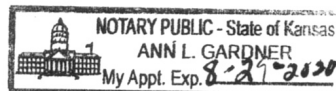

Thomas E. Gleason, Jr.

Subscribed and sworn to before me this 11th day of October, 2019.


Notary Public

My Appointment Expires:

8-29-2020



CERTIFICATE OF SERVICE

Thomas E. Gleason, Jr., hereby certifies that a true and correct copy of the above and foregoing Response was served electronically on the following on this 11th day of October, 2002:

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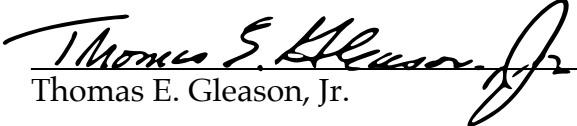
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