

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

In the Matter of an Investigation to Determine the)
Affordable Local Service Rates for)
Rate-of-Return Regulated Carriers and the) Docket No. 21-GIMT-095-GIT
Annual Assessment Rate for the Twenty-Fifth)
Year of the Kansas Universal Service Fund,)
Effective March 1, 2021)

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY
FOR UNIVERSAL SERVICE FUND REPORTING**

COMES NOW 8x8, Inc. (“8x8”) respectfully to request that the Commission permit its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund (“KUSF”).

1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9* (rel. Jan. 24, 2012).

2. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8, which the Commission had requested. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction.

Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

3. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022-February 2023*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel. May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY25. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2021, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:
Brendan Kasper
C0533E920C6D43D.

Brendan Kasper
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VERIFICATION

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024.

Suzanne Seandel
Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ___ day of _____, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

*See attached
Acknowledgment*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8th day of July, 2024, to the parties below.



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AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.

I, Suzanne Michelle Seandel, state as follows:

1. I am employed by 8x8, Inc. (“8x8”) as Chief Accounting Officer. In this capacity I am responsible for, among other things, reporting and payments to the Kansas Universal Service Fund.

2. When reporting revenues to the Universal Service Administrative Company for the federal universal service (“USF”) program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY25 revenue reporting (and federal USF reporting for calendar year 2021) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.


Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel,
Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached Acknowledgment

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

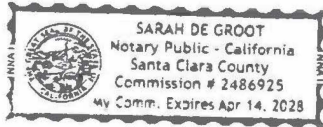
On July 8, 2024 before me, Sarah de Groot, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Seandel
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Sarah de Groot
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

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Signer's Name: _____

Corporate Officer – Title(s): _____

Corporate Officer – Title(s): _____

Partner – Limited General

Partner – Limited General

Individual Attorney in Fact

Individual Attorney in Fact

Trustee Guardian or Conservator

Trustee Guardian or Conservator

Other: _____

Other: _____

Signer is Representing: _____

Signer is Representing: _____

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT: 8X8, INC. TRAFFIC STUDY

Attachment Redacted in its Entirety