



August 15, 2019

Ms. Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604

RE: Docket No. 19-GIMT-399-GIT
Revised Filing
Rural Telephone Service Company, Inc. dba Nex-Tech

Dear Ms. Retz:

Attached for filing in the above referenced docket, please find a revised Attachment 2a of the Section 254(e) certification for Federal Universal Service Support.

This letter is a formal request for confidential treatment of Attachment 2a. The information contained in Attachment 2a is of such competitive sensitivity that its disclosure to any person other than Rural Telephone Service Co., Inc dba Nex-Tech, 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.

Nex-Tech believes that disclosure of the information contained in Attachment 2a would have significant and adverse impact on its ability to remain competitive with existing and potential rival 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 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.

As always, if you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rhonda S. Goddard", is written over a horizontal line.

Rhonda S. Goddard
Chief Financial Officer

RSG/sks
Attachments

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

**19-GIMT-399-GIT
Attachment 2a**

Company Name: Rural Telephone Service Company, Inc. dba Nex-Tech

**Proprietary Information (not to be distributed
without specific written approval)**

DATA YEAR: 2018 *REDACTED*

	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
INVESTMENT		
1. Plant Accounts		
a. Acct 2001	(160)	
2. Selected Plant Accounts		
a. Acct 2210	(230)	
b. Acct 2220	(235)	
c. Acct 2230	(240)	
d. Total Central Office Equip	(245)	
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410	(255)	
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 Tot Assets	(800)	
Acct. 2680 (2230) COE Trans	(805)	
Acct. 2680 (Cat. 4.13) COE Trans	(810)	
Acct. 2680 (2410) Total CWF	(815)	
Acct. 2680 (2410) CWF-Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
PART 36 - COST STUDY DATA		
1. Cost Study Avg C&WF Acct 2410	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		
4. COE CAT 4.13 Factor		
5. Switching Factor		

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DATA YEAR: 2018

REDACTED

**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
1. Selected Plant Accounts		
a. Acct 2230	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110	(335)	
b. Acct 6110 (benefits)	(340)	
c. Acct 6110 (rents)	(345)	
d. Acct 6120	(350)	
e. Acct 6120 (benefits)	(355)	
f. Acct 6120 (rents)	(360)	
g. Acct 6210	(365)	
h. Acct 6210 (benefits)	(370)	
i. Acct 6210 (rents)	(375)	
j. Acct 6220	(380)	
k. Acct 6220 (benefits)	(385)	
l. Acct 6220 (rents)	(390)	
m. Acct 6230	(395)	
n. Acct 6230 (benefits)	(400)	
o. Acct 6230 (rents)	(405)	
p. (sum of lines 365+380+395)	(410)	
q. Acct 6410	(430)	
r. Acct 6410 (benefits)	(435)	
s. Acct 6410 (rents)	(440)	
t. Total Expenses Accts. 6110 - 6410	(445)	
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	
b. Acct 6530 (benefits)	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210)	(510)	
b. Acct 6560 (#2220)	(515)	
c. Acct 6560 (#2230)	(520)	
d. Acct 6560 (#2210-2230)	(525)	
e. Acct 6560 (#2410)	(530)	
5. Corporate Operating Expenses		
a. Acct 6710	(535)	
b. Acct 6710 (benefits)	(540)	
c. Acct 6720	(550)	
d. Acct 6720 (benefits)	(555)	
e.Total Corporate Operating Expense (line 535+550)	(565)	
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	
Sum of All Expenses (Excluding Depreciation)		
7. Taxes		
a. Acct 7200	(650)	

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Proprietary Information (not to be distributed without specific written approval)		
DATA YEAR:	2018	REDACTED
Test for use of FUSF & KUSF		
CAPITAL:		
1. Category 1 C&WF		
2. Category 4.13 COE and Switching		
MAINTENANCE:		
3. CWF - MAINT. EXP.		
4. COE - MAINT. SW		
5. COE - MAINT-OP SYSTEM		
6. COE - MAINT. - TRANS.		
7. CWF - NETWORK SUPPORT		
8. COE - NETWORK SUPPORT		
9. CWF GENERAL SUPPORT		
10. COE GENERAL SUPPORT		
20. CWF NETWORK OPERATION		
21. COE NETWORK OPERATION		
22. CWF EXEC. & PLANNING		
23. COE EXEC. & PLANNING		
24. CWF GENERAL ADMIN.		
25. COE GENERAL ADMIN.		
26. CWF OPERATING TAXES		
27. COE OPERATING TAXES		
28. CWF BENEFITS - TTL OPER EXP		
29. COE BENEFITS - TTL OPER EXP		
30. CWF RENTS - TTL OPER EXP		
31. COE RENTS - TTL OPER EXP		

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DATA YEAR: **2018** **REDACTED**

A. Total Cash Expenditures Associated with USF

B. Certified Federal USF Receipts:

B1. High Cost Loop Support / Frozen High Cost Support

3,403,094

B2. Safety Net Support

-

B3. Safety Valve Support for acquired Exch.

1,260,125

B4. Connect America Cost Model

-

B5. Alternative Connect America Model

-

B8. Total Federal USF Receipts

4,663,219

C. Gross KUSF Receipts (do not deduct KUSF assessments paid)

2,741,952

D. Total FUSF and KUSF Receipts

7,405,171

E. Do Expenditures Exceed FUSF Receipts?

Yes

Amount Expenditures Exceed Certified FUSF

(negative number means FUSF exceeds Expenditures)

[A - B7]

F. Do Expenditures Exceed **FUSF & KUSF** Receipts?

Yes

Amount Expenditures Exceed Certified FUSF & KUSF

(negative number means FUSF & KUSF exceeds Expenditures)

[A - D]

Please provide the following information:

Contact: Stacey Stults

Title: Revenue Accountant

Phone No.: 785-621-7037

E-Mail: [sstults@nex-tech.com](mailto:ssults@nex-tech.com)