

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Dwight D. Keen, chair
 Shari Feist Albrecht
 Susan K. Duffy

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 19-GIMT-399-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support

RESPONSE OF INDEPENDENT TELECOMMUNICATIONS GROUP,
COLUMBUS ET AL., TO STAFF RECOMMENDATION

COMES NOW The Independent Telecommunications Group, Columbus *et al.*,
and submit the following Response to the Report and Recommendation of Commission
Staff ("Staff") filed herein October 8, 2019. For the reasons set forth herein Columbus
opposes the imposition of penalties as recommended therein by Staff. The Rural
Telephone Companies, as defined in K.S.A 66-11,187(l), comprising the Independent
Telecommunications Group are:

Columbus Communications Services, LLC
Cunningham Telephone Co., Inc.
Gorham Telephone Co., Inc.
H & B Communications, Inc.
Home Telephone Company, Inc.
LaHarpe Telephone Company, Inc.
Moundridge Telephone Company, Inc.
Totah Communications, Inc.
Twin Valley Telephone, Inc.
Wamego Telecommunications Company, Inc.
Wilson Telephone Company, Inc.
Zenda Telephone Company, Inc.

Each of the Columbus companies operates under traditional rate of return regulation
subject to each company's election pursuant to K.S.A. 66-2005(b).

1. It appears Staff's report and recommendation is based on, and arguably consistent with, past Commission practices on assessment of penalties, with the exception of a specific issue related to emailing Excel spreadsheet files separately discussed hereafter. Columbus urges, however, that the Commission now consider prior to imposition of any penalty whether such practices are consistent with reasonableness, fairness and the public interest.

2. Columbus submits that generally any imposition of a penalty for inadvertent error, made in good faith and promptly remedied on notice, is contrary to the public interest and that the proposed time-based methodology of determining the amount of such penalties as evidently utilized by Staff is arbitrary and capricious. Staff recommends imposition of a penalty effectively based on an absolute liability standard. The Commission, before imposing any such penalty order, should consider anew the purpose and effect of such a penalty.

3. Columbus does not contend that the Commission lacks authority generally to impose penalties on regulated utilities. Questions now properly before the Commission are whether such penalties assessed against small rate of return carriers advance the public interest, and whether enhancement of a penalty is reasonable when based on a period when the carrier is without knowledge of, and opportunity to correct, the error.

4. Staff has not claimed, and the record does not reflect, that any error or omission by any of these carriers impeded or delayed Staff's performance of its responsibilities in this docket. In each case, when notified by Staff of a claimed error in a filing, each carrier acted promptly to remediate or correct the issue. If a penalty has any prospective effect in such circumstances it is only to incur higher carrier effort and costs in the preparation of filings, resulting in greater costs either recoverable from ratepayers

or necessarily diverted from public service. The public interest has been better served by Staff's past approach to inadvertent shortcomings in filings: direct contact with the carrier and prompt correction of any oversight.

5. In the absence of any claim of negligent or improper operation by the carrier a penalty can serve no function benefiting the public. There is no assertion of willful conduct to be deterred, and the record here reflects mere inadvertent or interpretation errors that did not prevent Staff from performing its responsibilities in this docket. An after-the-fact recommendation of penalties actually imposes new regulatory burdens on carriers, requiring additional effort by Staff and by the carriers without producing material public benefit.

6. Imposition of a penalty cannot reasonably achieve any legitimate public purpose, unless it is intended solely as a revenue measure. Avoidance of any possibility of error under an absolute "no errors" standard would require prudent management of a public utility to incur significant additional expense in an attempt – likely futile – to assure virtual perfection in all regulatory submissions. Such a standard would not produce any resulting material benefit to ratepayers or to the public generally.

7. Any penalty imposed for an unintentional or technical deviation from an absolute liability standard detracts from the ability of such a utility to provide the high quality of public utility service consumers are entitled to expect and is therefore contrary to the public interest. This is particularly true when there is no evidence, or even claim, that the occurrence of a good-faith error materially impeded the Commission or its Staff in the performance of their respective duties. In this regard it is significant that the Commission, notwithstanding any initial filing errors in this proceeding, was able to meet its obligation under Section 254(e) of the Federal

Telecommunications Act of 1996 timely to recertify all Columbus carriers and all other Kansas RLECs as eligible for continued receipt of federal support.

8. Prudent management, under a standard of absolute liability even for minor good faith errors in a filing with the Commission, would require each Columbus carrier and each Kansas RLEC to incur significantly increased operating expenses in an attempt to assure freedom from any such error.

9. In practice, the only way a small carrier can be confident of an error-free filing is to submit its filing for review well in advance of its required filing date. This, in turn, would advance and aggravate demands on Staff's time and resources, particularly as to filings ordered to be made by numerous carriers simultaneously. In the case of annual ETC certifications Staff could be burdened by dozens of concurrent advance submissions and requests for their pre-deadline review. The alternative approach, timely correction of any errors identified by Staff in otherwise-timely filings, is a far more efficient and effective use of Staff's limited resources. This approach has been utilized successfully in various filings for many years. The threat of a fine is simply ineffective to guarantee error-free filings – not due to disregard of the possibility of a fine, but due to the impossibility of removing any human error.

10. Small rural telephone companies for the most part utilize outside expertise to prepare and submit required filings relating to costs and revenues. The alternative would be to require each small carrier, at significant added expense, to employ highly skilled personnel to perform only occasional tasks. Outside support is provided by entities having a multitude of other – often concurrent – obligations to other carriers in Kansas and other jurisdictions. The notion that all filings must be error-free is a departure from reason and common sense, as is any policy requiring penalties for mere errors readily correctable promptly upon their identification.

11. Ordinarily any reasonable added expense necessary to guarantee an errorless report by a carrier and thereby avoid risk of a penalty – if such guarantee were possible – would be recoverable under traditional rate of return regulation applicable to RLECs having elected such regulation under K.S.A. 66-2005(b). Under the provisions of K.S.A. 66-2008 (e)(3), however, it would appear that rural companies may be precluded from recovering such added costs, even though those newly added costs would be incurred solely to meet regulatory requirements imposed by the Commission. Whether or not this state of affairs amounts to a taking of the utility's private property, it is clear the addition of unrecoverable administrative expenses directly conflicts with the public interest in the provision of efficient and sufficient utility service at affordable rates.

12. Further, any effort by a rural carrier to recover the added costs necessitated by current penalty policy would likely require a full rate case application, placing a significant added burden on carrier and Staff alike – whether or not the costs of such an exercise ultimately would be recoverable.

13. In past years any inadvertent error in an RLEC filing has been resolved through timely contact from Staff and prompt correction by the carrier. In the present proceeding Staff, consistent with this approach and to Staff's credit, has simplified and expedited many individual corrections by volunteering to provide correction sheets to the Commission's docket room rather than require the carriers to submit formal amended filings. This non-adversary process has been effective to advance Staff's ability to perform its required activities in the docket without adding material (or in most cases, any) regulatory cost. This restraint in regulatory expense has permitted rate of return carriers to devote their limited resources and revenues to maintaining and improving the public utility service they provide to their consumers. A change of practice to an automatic presumption of penalty imposes additional regulatory burdens

on Staff and the subject carrier alike, without any positive effect on the carrier's service to its customers.

14. Conversely, a dollar spent on a penalty imposed for mere inadvertent error promptly corrected is a dollar that cannot be spent by the carrier to improve the quality of service provided to the public. Likewise, the time required of Staff to document an error and recommend a penalty to the Commission is time that cannot be spent in regulatory activity that can provide a tangible benefit to the public.

15. As addressed above, imposition of any penalty for an inadvertent and readily correctable error in filing is contrary to the public interest, as it diverts revenues and resources otherwise necessary for the provision of mandated public utility service. It is particularly arbitrary and unreasonable to set the amount of such a penalty based on the length of time since a filing with an inadvertent error was submitted. Timely filing by all RLECs in this docket was accomplished by June 28, 2019.

16. To base a penalty on the time between initial filing and correction artificially enhances the penalty without any aggravating act or omission by the subject carrier. It is questionable whether any penalty for a correctible good faith error is in the public interest; it is clearly arbitrary, capricious and contrary to justice and the public interest to enhance such penalty based solely on the passage of time when neither the carrier nor Staff was aware of a claimed error. If any penalty is appropriate it is reasonable only to base such penalty on any material period of time required for action by the carrier, on reasonable notice, to correct the error claimed, as this is the only interval over which the carrier has any element of control.

17. These carriers recognize Staff's available time is finite. Clearly not all filings can be analyzed immediately upon their receipt. As a result, as a necessary practical matter, Staff action determines when a carrier's filing will be reviewed and

when any possible errors could be identified. The result is that, given two carriers making the same error, Staff's choice of which carrier's filing to review first will cause imposition of disparate penalties for similar or identical errors. Such a result, imposing differing penalties for the same or similar claimed failure, beyond the control of a carrier, is facially arbitrary and capricious because the extent of the penalty bears no relation to the claimed fault of the carrier. The extent of the delay between filing and notice of error is random and unforeseeable to the carrier, and clearly beyond the control of the carrier, so an enhanced penalty would be ineffective as a greater incentive to assure perfection in carrier filings.

18. If Staff is unable to examine promptly a carrier's filing and identify a claimed error the carrier, unaware of the error, is effectively deprived of the opportunity to take corrective action at least until the claimed error is brought to the carrier's attention. It is unreasonable and illogical to assert a carrier should be penalized for delay in correcting an error of which it is unaware. Instead, the reasonable time for which a penalty might be considered is any significant interval between the carrier's awareness of the error and its correction of the error. These carriers question whether mere notification to a carrier of an error and prompt receipt of a correction requires significant Staff time or effort, as it may ordinarily be accomplished with a single electronic message or a single telephone call.

19. The only possibly reasonable relationship between the extent of a penalty for inadvertent error and the time before the issue is corrected is the time required for corrective action by the carrier *once it is made aware of the error*. As Staff is obliged to review numerous filings serially, thereby necessarily delay in identification of some carriers' error, the time necessary for correction is attributable to unavoidable limitations on Staff resources. That time is not related to any act or omission of the

carrier. The extent of any resulting penalty thereby set could be subject to the “luck of the draw” – which of the carriers’ filings happens to be reviewed earlier or later – rather than being set on any rational basis.

20. In the instant docket both Staff and certain carriers are affected by the recent development and provision of A-CAM federal support. This newly emerging federal support methodology creates deviations from the prior standard practices related to reporting of costs and revenues. Absent express Commission policy on this new form of revenues, adopted with reasonable opportunity for affected carriers’ input, a good faith effort to explain an element of a filing and treatment of such revenues cannot reasonably be designated as erroneous if it differs from Staff’s expectations. Any time required to resolve the effect of this new revenue issue should not be considered a reasonable basis for a penalty, or of enhancement of the extent of such a penalty.

21. Assuming for the sake of discussion that any time-based penalty can be appropriate in a case of inadvertent error, the extent of the penalty may be reasonably related *only* to the time elapsed for the carrier’s remedial action remediation *after* the carrier is made aware of the error. In most, if not all cases of Columbus companies notified by Staff of a claimed error, each carrier initiated and pursued prompt remedial action – sometimes within minutes or hours. Penalizing a carrier based on a claimed failure to correct an inadvertent error for a greater period, during which neither the carrier nor Staff was aware of that error, is inherently arbitrary and unreasonable. In the case of any error promptly corrected on notice from Staff any adverse impact is *de minimis*.

22. It is not clear from Staff’s Report and Recommendation when Staff first became aware of claimed errors in any individual carrier’s filing. Surely basic notions of fairness and reasonable regulation require that the Commission afford a reasonable

opportunity to mitigate the impact of any error, rather than defer notice to a carrier with a resulting increase in the penalty under present policy.

23. There is no lawful basis to impose a penalty for a claimed violation of the Commission's Order of April 11, 2019 initiating this Docket as it relates to emailing copies of Excel spreadsheet files to certain Staff personnel. The relevant provision of that Order states: "B. The required ETC certifications, along with the attached worksheet(s), shall be filed with the Commission in this docket on or before July 1, 2019. Refer to Staffs R&R to determine which filings need to be made by which entities and how to report the information. Note that copies of the supporting Excel files for Attachments 2-5 should be e-mailed to c.aarnes@kcc.ks.gov and s.reams@kcc.ks.gov."

24. Penal action by an agency of a state, under due process of law, may be taken only subject to a strict interpretation of a requirement claimed to have been violated. The Staff Report and Recommendation identifies as an issue for numerous carriers the following: "Follow-up required to obtain supporting Excel files, as required by Order." That Order (Order Opening Docket; Requiring Compliance Filings, dated April 11, 2019), as quoted above, sets a deadline *only* for the filing of "[t]he required ETC certifications, along with the attached worksheet(s)..."

25. All Columbus carriers timely filed all such certifications and worksheets were as ordered. The separate directive to email "copies of the supporting Excel files for Attachments 2-5" is in a separate and subsequent sentence including no date for compliance. Columbus carriers' provision of the referenced Excel files promptly upon request Staff satisfies this provision of the Commission's Order.

26. It may be claimed Staff or the Commission contemplated or presumed a carrier's provision of Excel files concurrent with the required filing by July 1, 2019. The

Commission could have ordered that additional action by a date certain, yet the Order of April 11, 2019 does not so state. The subject carriers are not responsible for the drafting of the Order; they are required only to comply with the Order as issued, and they have done so. Imposition of a penalty based on an intent not expressly stated amounts to an *ex post facto* punitive action.

27. Columbus does not know when Staff became aware of the presence or absence of emails from any Columbus carrier providing Excel files to Staff. It appears, however, that there was no Staff communication to any Columbus company, its consultants or its counsel on this matter before July 8, 2019, a full week after the date specified for filing required ETC certifications and worksheets and some eleven or twelve days after the companies' timely filings June 28, 2019. Again, Columbus is aware and appreciates the limitations of time and resources available to Staff; it does not follow that a carrier should be subjected to a penalty for failure to provide materials during a period when Staff is unable to utilize those materials.

28. Staff received all Columbus carriers' Excel files as ordered either July 8 or July 9, within a day of contact from Staff to the carrier, to its cost consultants directly, and/or to the carrier's counsel. In some cases the subject files were provided within an hour of contact from Staff.

29. Staff's Report and Recommendation, and the record as a whole, contain no substantial competent evidence of violation of the express terms of a Commission Order as to the provision of Excel files. Further, all such files were provided as ordered, each either at the time of filing or within a day of contact regarding such files from Staff. Such provision was reasonably timely for the purpose of allowing Staff to utilize the subject files. There is no lawful basis for imposition of any penalty order regarding provision of Excel files by any Columbus carrier.

30. Attachment A to Staff's Report and Recommendation appears to identify "issues" for certain Columbus carriers with an "N/A" designation and/or a recitation of "0" as the "No. of Days Filing was Incomplete Beyond Due Date." Columbus reasonably assumes Staff proposes no penalty in such instances. If, to the contrary, Staff proposes imposition of a penalty in any such instance Columbus and the individual carrier request leave to submit further timely response thereto.

WHEREFORE these rural telephone companies pray the Commission not impose penalties related to emailing Excel files; that the Commission consider anew its current policies and practices regarding imposition of penalties; that the Commission not impose penalties in the absence of substantial competent evidence of willful or culpable conduct contravening its Orders, or of unreasonable delay in remedying any inadvertent errors; that the Commission find no public interest is advanced through the imposition of penalties for inadvertent and readily corrected filing errors, and that no penalties be imposed on rate of return carriers in this proceeding for any of the "issues" recited in Attachment A to Staff's Report and Recommendation of October 8, 2019.


Respectfully Submitted,


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VERIFICATION

STATE OF KANSAS, DOUGLAS COUNTY, ss:

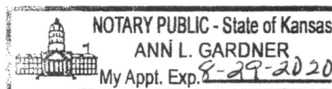
Thomas E. Gleason, Jr., of lawful age, being first duly sworn, on his oath states:
He is the attorney for the Independent Telecommunications Group, Columbus *et al.*; that
he has read the above and foregoing Response; that the statements, allegations and
matters contained therein are true and correct.


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
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