THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Investigation to Determine) the Assessment Rate for the Twenty-Second) Year of the Kansas Universal Service Fund,) Effective March 1, 2018.)

Docket No. 18-GIMT-084-GIT

DIRECT TESTIMONY

OF

SANDRA REAMS

ON

BEHALF OF THE

KANSAS CORPORATION COMMISSION STAFF

December 19, 2017

1 Q. Please state your name and business address.

A. My name is Sandra (Sandy) K. Reams. My business address is: Kansas Corporation
Commission (Commission), 1500 S.W. Arrowhead Road, Topeka, Kansas 66604.

4 **Q.** What is your position at the Commission?

A. I am the Assistant Chief of Telecommunications for the technical staff (Staff) of the
Commission. I was promoted to my current position in October 2011. I became employed
by the Commission in December 1996 as a Utility Regulatory Auditor and, in June 1997,
was promoted to Senior Utility Regulatory Auditor. In February 1998, I changed
positions to a Telecommunications Auditor. In April 2002, I was promoted to Managing
Auditor and, in October 2011, I was promoted to my current position.

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Q. What is your educational background?

12 A. I received a Bachelor of Arts in Accounting from Buena Vista University, Storm Lake, 13 Iowa, and Iowa Certified Public Accountant Certificate (No. 9487). During my 14 employment with the Commission, I have attended various regulatory and 15 telecommunications related courses. Since August 2010, I have served as the Chair for 16 the National Association of Regulatory Utility Commissioners' (NARUC) Staff 17 Subcommittee on State Universal Service Fund Administrators and have been a member 18 of the Subcommittee since 2002. I also serve as an at-large Staff member on the Federal 19 Communications Commission (FCC) Federal/State Joint Board on Separations and 20 previously served as the Staff Chair for the State Commissioners of the Federal 21 Communications Commission (FCC) - State Joint Conference on Accounting Issues. I 22 was also a member of the FCC - State Joint Oversight Team for the audits of Southwestern

Bell Telephone Company's (SWBT) compliance with affiliate transaction and non discriminatory provisions contained in Section 272 of the 1996 Federal
 Telecommunications Act.

4 Q. Have you previously testified before the Commission?

- A. Yes. I have provided written and oral testimony on the annual Kansas Universal Service
 Fund (KUSF) assessment rate and other KUSF-related issues, intrastate access rates, interLATA dialing parity and related cost recovery mechanisms, intrastate revenue requirement
 cost of service components, and Eligible Telecommunications Carrier (ETC) issues. Prior
 to joining the telecommunications section, I testified on gas industry issues, including taxrelated issues, shared service agreements, and acquisition premiums.
- 11 I. Testimony Summary

12 Q. Please summarize your testimony and recommendations.

A. On August 31, 2017, the Commission issued an Order opening this Docket (Opening
Order) to determine the KUSF assessment rate for the twenty-second year of the KUSF,
effective March 1, 2018, through February 28, 2019 (Year 22). The Commission directed
Staff to file its direct testimony and calculations supporting its proposed KUSF
assessment rate by December 20, 2017.

Based on the information contained in my testimony and supporting calculations, Staff
recommends that the Commission adopt a 7.50% assessment rate for KUSF Year 22
based on the following:

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1 2 3 4 5		• total KUSF funding obligations of \$41.0 million, comprised of: (1) \$38.3 million for high-cost support; (2) \$2.1 million for the Telecommunications Relay Service (TRS), Telecommunications Access Program (TAP), and the Kansas Lifeline Service Program (KLSP); and (3) \$553,000 for KUSF administration and audit expenses;
6 7		• an estimated KUSF balance, or Reserve, of \$2.6 million, as of February 28, 2018;
8		• a \$2.9 million Contingency Fund Allowance; and
9 10		• an intrastate net retail assessable revenue base of \$549.9 million from which to collect the KUSF monies.
11	Q.	What should a party do if it becomes aware of a computational error in Staff's
12		calculations?
13	A.	The Opening Order, paragraph 9, directs any party that becomes aware of a computational
14		error to notify Staff as soon as possible. This will allow Staff time to determine if the error
15		has a material effect and file revised calculations, if necessary.
16	Q.	Please explain why the KUSF assessment rate will increase from 7.25% to 7.50%.
17	A.	The KUSF assessment rate has two main components: (1) the monies to be paid from the
18		KUSF, referred to as KUSF obligations; and (2) the assessable revenue base from which
19		to collect those monies. For KUSF Year 22, the net KUSF obligations are estimated to
20		decline \$5.2 million, however, Staff estimates the intrastate net retail revenue base
21		subject to the KUSF assessment will decline \$89.7 million. Staff notes that the actual
22		revenue reported by carriers may be impacted by Virgin Mobile's lawsuit ¹ challenging
23		the Commission's directive for the Company to report Lifeline subscriber revenue

¹ Virgin Mobile USA, L.P. v. Pat Apple et al, Case No. 2:17-cv-02524-JAR-JPO (D. Kan).

1 recovered from the federal Lifeline program for KUSF purposes.²

Q. Is it likely the actual KUSF Year 21 and projected KUSF Year 22 operating results will vary from Staff's projections?

4 A. Yes. My testimony relies on the information available to Staff at this time; however, 5 actual KUSF operational results will likely vary from Staff's projections. For example, 6 KUSF Year 22 disbursements may vary as a result of: (1) a change to a Rural Local 7 Exchange Carrier's (RLEC) KUSF support arising from a company-specific audit; (2) 8 implementation of the \$30.0 million cap provided for in K.S.A. 66-2008; (3) a change in 9 the KUSF support paid to United Telephone Companies of Kansas d/b/a CenturyLink 10 (CenturyLink) as a result of its receipt of federal Connect America Fund, Phase II (CAF 11 II) funding; (4) increased or decreased expenses for the TRS, TAP, or KLSP programs; 12 and/or (5) increased or decreased administrative-related expenses. The projected 13 assessable revenue base will likely vary from the actual KUSF revenue reported by 14 companies.

15 **II.**

YEAR 22 ASSESSMENT RATE

16 Q. Please summarize Staff's calculation of the proposed 7.50% KUSF Year 22 17 assessment rate.

18 A. Exhibit SKR-1, page 1, line 15, shows total projected KUSF obligations of \$41.0 million,

19 reduced by the projected \$2.6 million Reserve³ and increased \$2.9 million for an allowance

² Docket No. 17-VMBZ-023-KSF, July 11, 2017 Order Accepting and Adopting GVNW Consulting, Inc.'s Audit Report and Recommendation.

³ See K.S.A. 66-2008(a) and Docket No. 00-GIMT-236-GIT (Docket 00-236), Jan. 19, 2000 Order No. 5 Establishing

1	for a Contingency Fund. ⁴ In total, Staff projects that for Year 22, the KUSF will need to
2	collect \$41.2 million from an estimated \$549.9 million intrastate assessable revenue base.
3	A comparison between the projected KUSF Year 22 and the current Year 21 data is
4	summarized in Table 1:

Tabla 1

5

KUSF Funding (Millions)	14				Ir	npact on KUSF
Description	Year 22		Year 21		Obligations	
Gross KUSF Obligations	\$	41.0	\$	44.1	\$	(3.1)
Less: Reserve		2.6		0.9		1.7
Plus: Contingency Allowance		2.9		3.2		(0.3)
Adjusted Net KUSF Obligations	\$	41.2	\$	46.4	\$	(5.2)
Intrastate Retail Revenue Base	\$	549.9	\$	639.7	\$	(89.7)
Percentage Assessment Rate		7.50%		7.25%		0.25%

6 Q. What supporting documentation is being filed to support Staff's calculations?

- 7 A. Documentation supporting Staff's calculations and the proposed assessment rate are
- 8 included in Exhibit SKR-1 and Attachment A through M. Specifically, Exhibit SKR-1
- 9 contains the following information to support the assessment rate calculation:
- page 1 identifies each KUSF obligation, the Reserve, the Contingency Fund, and the resulting net KUSF obligation, or total KUSF monies to collect from carriers.
 Page 1 also identified references to the Attachment(s) containing additional supporting documentation;
- page 2 contains a summary of the projected KUSF Year 22 revenues by carrier or carrier category and references to any additional Attachment(s) containing additional supporting documentation; and
- page 3 contains the calculation of the proposed 7.50% assessment rate, derived by
 dividing the net KUSF obligation by the projected Year 22 assessable revenue base.
- 19 References to specific months referenced in my testimony and supporting documentation
- 20 reflect that the KUSF operates one month in arrears, meaning the revenue, assessments,

Carrier Assessment Rate For Year 2000 KUSF Contributions (Order No. 5), ¶ 26.

⁴ Id., ¶ 28.

1	and disbursements for one calendar month are recognized for KUSF purposes in the
2	following calendar month. For example, revenue earned in November 2017 was due to be
3	reported to the KUSF on or before December 15, 2017. Payment of the related assessments
4	were due at the same time and payment from the KUSF to companies and for the supported
5	programs will be disbursed by January 1, 2018.

6 **Q.**

Is any confidential information contained in the supporting documentation?

A. Yes. I am filing a complete, separate set of redacted and confidential work papers with
my testimony. Exhibit SKR-1, page 2, and various pages within Attachments B and H
through L are designated as confidential since they contain company-specific revenue
and/or access line data. Staff's calculations, however, use aggregated and public data to
the extent possible to allow parties an opportunity to review Staff's calculations and,
therefore, Exhibit SKR-1, pages 1 and 3, Attachments A, C through G, and M contain
only public data.

Confidential data is available only to the specific company that the data is for and the Citizens' Utility Ratepayer Board (CURB) for review.⁵ To help ensure the accuracy of the data and calculations submitted to the Commission, Staff provided SWBT and CenturyLink a copy of their company-specific calculations and discussed companyspecific data with other carriers, as requested.

⁵ Docket 94-478, December 11, 1998, Order: (1) Granting CMT Partners Petition for Reconsideration and/or Clarification to the Extent that the Protective Order Issued in This Docket is Amended; (2) Granting CURB's Petition for Reconsideration and/or Clarification to the Extent that the Commission Clarifies its Intent for CURB to Have Access to Same Information as Staff; and (3) Granting Staff's Motion for Clarification and Clarifies its Intent on the Auditing Procedures and the Future Calculation of the Assessment Rate, $\P12 - 17$.

1 Q. How do companies pay and recover their KUSF assessments?

A. A company's KUSF assessment is based on its self-reported intrastate retail revenue
 multiplied by the Commission-approved KUSF percentage assessment rate.⁶
 Furthermore, K.S.A. 66-2008(a) authorizes, but does not require, companies to collect
 their assessments from customers, which the majority of companies do.

6 III. KUSF OBLIGATIONS

Q. Exhibit SKR-1, page 1, shows the RLECs will receive approximately \$29.3 million of KUSF support in Year 22. Please explain how this amount was calculated.

9 A. The details of the calculation of the \$29.3 million of KUSF support for the RLECs are 10 contained in Attachment A. Staff's calculation began with the annual KUSF support 11 received by an RLEC as of December 1, 2017. The RLECs will not implement local 12 service rate adjustments to the statewide affordable rates or intrastate access rate and 13 revenue adjustments pursuant to K.S.A. 66-2005 during KUSF Year 22, thus, the only 14 adjustments to the RLECs' combined annual KUSF support are: (1) an anticipated increase 15 to Rainbow Telecommunications Association, Inc.'s (Rainbow) annual KUSF support; and 16 (2) a reduction in the annual KUSF support payable to J.B.N. Telephone Company, Inc. 17 (JBN); LaHarpe Telephone Company, Inc. (LaHarpe); Peoples Telecommunications, 18 LLC's (Peoples); and Zenda Telephone Company, Inc. (Zenda).

19 Q. Please explain why Rainbow's annual KUSF support is expected to increase.

⁶ Docket No. 15-GIMT-073-GIT (Docket 15-073), May 21, 2015 Order Eliminating KUSF Local Service Per Line Rates.

1	A.	In July 2017, Rainbow filed an Application seeking a \$1.4 million increase in its annual
2		KUSF support. ⁷ In October 2017, Staff filed its Direct Testimony, supporting a \$618,864
3		increase in the Company's annual KUSF support. ⁸ On November 8, 2017, Staff filed an
4		errata to its testimony, supporting a \$685,093 increase in Rainbow's annual KUSF
5		support. ⁹ On November 9, 2017, Rainbow and Staff filed a Joint Motion To Approve
6		Staff's Position Regarding Rainbow's Annual Cost-Based KUSF Support (Joint Motion),
7		stating the Company's annual KUSF support should be increased by \$685,093, resulting
8		in the Company receiving \$820,635 of annual KUSF support, effective the first of the
9		month following a Commission Order. A Commission Order is due no later than February
10		14, 2018, ¹⁰ meaning Rainbow's new KUSF support level will be effective no later than
11		March 1, 2018. For Year 22 budgeting purposes, Staff recognizes \$820,635 of annual
12		KUSF support for Rainbow.

13 Q. Staff's calculations reflect a reduction in the annual KUSF support for JBN,

14 LaHarpe, Peoples, and Zenda. Please explain why.

15 A. These RLECs incurred rate case or audit expense as a result of individual company audits.

16 The Commission has adopted a policy of allowing recovery of the audit expense over a

- 17 five-year period. Each of these RLECs' five year recovery period will end during KUSF
- 18 Year 22, as follows:
- JBN was authorized to recover \$99,105 of total audit expense or \$19,821 annually.¹¹
 JBN's recovery period ends June 2018, therefore, Staff's calculations reflect the elimination of this recovery effective July 2018. This means that for the months of

⁷ Docket No. 17-RNBT-555-KSF (Docket 17-555), July 19, 2017 Direct Testimony of Daniel Meszler, p.3.

⁸ Id., Oct. 26, 2017 Direct Testimony Prepared by Katie L. Figgs, p. 4.

⁹ Id., Errata Testimony of Katie L. Figgs, p. 4.

¹⁰ Id., July 11, 2017 Order Setting Procedural Schedule.

¹¹ Docket No. 13-JBNT-437-KSF, June 13 and June 26, 2013 Orders.

1 2 3		July 2018 through February 2019, JBN's Year 22 KUSF support is reduced \$13,214 to recognize the completed recovery of its audit expense approved by the Commission in Docket No. 13-JBNT-437-KSF;
4 5 6 7 8 9		• LaHarpe was authorized to recover a total audit expense of \$172,060 over the five- year period, or \$34,412 annually, which will be fully recovered as of June 2018. ¹² Effective July 2018, LaHarpe's \$17,760 of annual KUSF support will be eliminated since the audit expense recovery amount exceeds LaHarpe's total KUSF support. I note that page 1, Attachment A, column C, reflects the cumulative KUSF support amount LaHarpe will receive for the months of March through June 2017;
10 11 12 13 14		• Peoples was authorized to recover \$59,660 of audit expense, or \$11,932 annually, over the five-year period. ¹³ Recovery of the audit expense will be complete as of November 2018. Thus, Staff's calculations reflect a \$2,983 total reduction in the Company's KUSF support for the months of December 2018 through February 2019; and
15 16 17 18		• Zenda was authorized to recover total audit expense of \$49,545, or \$9,909 annually. ¹⁴ Effective July 2018, the Company will fully recover this expense and, therefore, Staff's calculations reflect a \$5,780 reduction in the Company's KUSF support, effective for the months of August 2018 through February 2019.
19	Q.	K.S.A. 66-2008(e)(3) limits the RLECs' total combined annual KUSF support to
20		\$30.0 million. Has Staff performed an analysis regarding the RLECs' annual KUSF
21		support distributions and the statutory cap?
22	A.	Yes. As shown on Attachment A, page 1, Staff estimates the RLECs will receive, in total,
23		\$29.3 million in KUSF support during KUSF Year 22, or \$742,000 less than the \$30.0
24		million cap.
25	Q.	Exhibit SKR-1, page 1, line 2, shows \$9.1 million of annual KUSF support for
26		CenturyLink Please explain how this amount was calculated

- CenturyLink. Please explain how this amount was calculated. 26
- K.S.A. 66-2008(c)¹⁵ governs the calculation of CenturyLink's KUSF support. 27 A.

 ¹² Docket No. 12-LHPT-875-AUD, June 26, 2013 Order.
 ¹³ Docket No. 13-PPLT-678-KSF, Nov. 5, 2013 Order.

¹⁴ Docket No. 13-ZENT-065-KSF, July 3, 2013 Order.

¹⁵ K.S.A. 66-2008(c)(2) is moot as CenturyLink has not requested or been granted price deregulation in any exchange.

1	CenturyLink's annual KUSF support is capped at \$11.4 million ¹⁶ and must be calculated
2	using the high-cost model adopted by the Commission. ¹⁷ Furthermore, CenturyLink's
3	annual KUSF support is required to be reduced by the CAF II support it receives "for the
4	same household, if feasible, or for the same census block" that also receives KUSF support.
5	Attachment B shows that the calculation of CenturyLink's KUSF support begins with
6	inputting the Company's September 30, 2017 KUSF support eligible lines into the KUSF
7	support high-cost model, separately for each of the 112 high-cost wire centers and the two
8	KUSF zones. ¹⁸ Monthly KUSF support ranges from \$0.15 to \$243.23 per line depending
9	on the location. In total, CenturyLink qualifies to receive \$11.3 million of gross cost-based
10	KUSF support. Pursuant to K.S.A. 66-2008(c), this must be reduced by the \$3.2 million
11	of annual CAF II support CenturyLink receives for each household location that receives
12	KUSF support, ¹⁹ resulting in a net \$8.1 million of cost-based KUSF support.
13	The next step in calculating CenturyLink's KUSF support is to determine the amount of
14	revenue-neutral KUSF support the Company qualifies to receive in order to recover the
15	intrastate access revenue reduction arising from reducing its intrastate access rates to parity
16	with interstate rates. ²⁰ This access revenue recovery support is based on: (1) the calculated
17	intrastate switched access revenue loss associated with the reduction in its intrastate rates,

¹⁶ CenturyLink received \$13.3 million in KUSF support for the Fiscal Year ended February 2013. The 90% limit results in \$11.95 million of annual KUSF support, therefore, CenturyLink's annual KUSF support is capped at \$11.4 million.

¹⁹ The calculated CAF II and KUSF support are subject to true-up. Docket 16-511, Oct. 11, 2016 Order, ¶ 11.

¹⁷ Docket No. 99-GIMT-326-GIT, Sept. 30, 1999 Order No. 10 and Dec. 29, 1999 Order No. 16.

¹⁸ Docket 00-236, Feb. 14, 2000 Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions, in which the Commission adopted the city limits as the IBRA/OBRA delineation points for CenturyLink's United of Eastern Kansas and United of South Central Kansas study areas.

²⁰ Docket No. 08-GIMT-1023-GIT, March 10, 2010 Order Setting Embarq's Intrastate Access Rates to Parity and Providing for Rebalancing Through the KUSF and June 4, 2010 Order on Second Petition for Reconsideration.

based on volumes as of the current September 30th; and (2) a true-up to recognize the
 difference between the revenue-neutral access support the Company received for the
 months of October 2016 through September 2017 and the support CenturyLink should have
 received based on the actual intrastate access usage for the twelve months' ended
 September 2017.

6 As shown in Attachment B, based on its intrastate access usage for the 12 months' ended 7 September 2017, CenturyLink was qualified to receive \$998,000 of access recovery 8 support for the months of October 2016 through September 2017: in contrast, CenturyLink 9 received \$1.041 million for these months. The amount paid to CenturyLink for the months 10 of October through September must be determined prior to the actual usage being known 11 and, therefore, the access support recovery paid was based on the usage for the twelve 12 months ended September 2016. Now that the actual usage for the twelve months ended 13 September 2017 is known, a true-up to recognize the actual recovery amount is necessary. 14 In other words, the \$1.042 million of revenue-neutral access support recovery paid to 15 CenturyLink for October 2016 through September 2017 was \$44,000 more than the 16 \$998,000 CenturyLink should have been paid. To account for this over-payment, the KUSF 17 Year 22 access recovery support of \$998,000 is reduced by the \$44,000 true-up, with 18 CenturyLink being paid \$954,000 for the year.

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Q. Please explain the annual KUSF support calculated for the competitive ETCs.

A. For KUSF Year 21, the competitive ETCs received a combined \$2.2 million of annual
KUSF support, as shown on Attachment C. Pursuant to K.S.A. 66-2008(c)(4), all KUSF

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1		support for competitive ETCs is eliminated effective March 1, 2018, thus, Staff's
2		calculations reflect that no KUSF support will be paid to competitive ETCs.
3	Q.	How did Staff determine the annual funding for TRS and TAP?
4	A.	Staff's calculations, shown in Attachment D, include \$421,000 to fund TRS and \$228,000
5		to fund TAP in Year 22, a total of \$649,000 for both programs. Staff's calculations reflect
6		the higher of two calculated amounts, as follows:
7 8 9 10		1. Staff calculated the funding for each program based on the March through October 2017 disbursements. Staff then calculated the monthly average disbursement for each program and annualized the expense. This approach results in \$418,000 of annual expense for TRS and \$181,000 for TAP; and
11 12 13 14 15 16 17 18 19		2. Staff calculated funding for each program based on the Commission's Contract with Assistive Technologies for Kansans (ATK) to administer the TRS and TAP. ²¹ The Contract provides an annual TRS administrative fee of \$17,190 plus the actual expense paid to Hamilton Relay to provide the underlying relay service. Hamilton Relay's average monthly expense for providing relay service is \$33,481 or \$401,771 annually. Adding this to the administrative expense and allowing for an annual true-up, this approach yields \$420,722 in annual TRS expense. For TAP, the Contract provides for an administrative expense of \$143,521. ²² Staff then added \$98,000 for TAP equipment, bringing the total TAP annual funding to \$228,000.
20	Q.	Please explain how Staff calculated the \$1.4 million of funding for the KLSP.
21	A.	The calculation of the \$1.4 million to fund the KLSP, shown in Attachment E, is based on
22		the \$981,000 of KLSP credits disbursed for low-income subscribers for the months of
23		March through October 2017. On average, the KLSP provided \$123,000 in KLSP credits
24		to support approximately 16,000 lines each month. Annualizing the 8-month average
25		results in an estimated \$1.5 million of annual funding for the KLSP.

Assistants (PDAs) or cellphones. ATK will only be reimbursed the amount incurred for PDAs and a 10% indirect cost allowance.

1 Trends in KLSP funding and subscribership for the KUSF Fiscal Years ended February 2 2015 through 2017, in addition to the funding for KUSF Year 21, indicates periods of both growth and decline in subscribership, as shown on page 1 of Attachment E.²³ Page 2 of 3 4 Attachment E shows that funding and subscribership are currently trending downward. 5 Thus, to determine a reasonable level of KLSP funding, Staff also calculated the monthly 6 average KLSP credits for: (1) the six-month period of May through October 2017 7 (\$118,000); and (2) the three-month period of August through October 2017 (\$105,000). 8 Annualizing each average results in total KLSP funding of \$1.4 and \$1.3 million, 9 respectively. Although KLSP funding and subscribership are currently trending downward, 10 to ensure sufficient funding within the KUSF, Staff recognized \$1.4 million of annual 11 funding, based on annualizing the 6 months' average, and a nominal 2% subscribership 12 increase.

13 Q. Please explain how the \$553,000 of funding for KUSF administration and audit

- 14 **expense was derived.**
- 15 A. The calculation of the \$553,000 to fund the KUSF administration and audit expense, shown
- 16 in Attachment F, is comprised of the following components:
- 171.KUSF daily administration:On June 10, 2016, the Commission and GVNW18Consulting, Inc. (GVNW) entered into an Agreement to extend the KUSF19administration Contract. Pursuant to the Contract, the fee for the day-to-day20administration of the KUSF is \$189,948 annually. In addition, GVNW receives21\$1,404.92 per month, or \$16,859 annually, for costs associated with implementing22and maintaining additional internal control procedures and, therefore, Staff's

²³ Decline may be attributed to SWBT self-funding KLSP credits to its subscribers for the period of September 2015 through May 31, 2017. Effective May 31, 2017, SWBT ceased participation in the KLSP (Docket No. 16-SWBT-192-CPL, July 25, 2017 Order), and TAG Mobile, LLC's ETC designation being revoked (Docket No. 16-TAGC-323-SHO, Oct. 19, 2017 Order).

- 1 calculations reflect \$207,000 to fund the day-to-day expenses associated with the 2 administration of the KUSF;
- 3 2. KUSF carrier audit expense: Staff's calculations recognize \$301,000 for GVNW 4 to conduct sixteen carrier audits during KUSF Year 22. Pursuant to the KUSF 5 administration Contract, carrier audit expense is accrued for work performed in 6 January through June and also for worked performed in July through December. 7 The expenses are generally paid in July and January. In a letter dated August 8, 8 2017, GVNW was authorized to be reimbursed \$166,000 from the KUSF for carrier 9 audit work performed between January 1 and June 30, 2017. As of December 4, 10 2017, GVNW has accrued \$113,000 in expense for audit work conducted between July 1 and November 30, 2017. In order to estimate the total expense for a year, 11 the monthly average of \$19,000 was used for the January 2018 expense. By adding 12 13 this to the \$113,000 accrued amount, Staff projects GVNW will accrue \$135,000 14 of audit expense for the months of July through December 2017.
- 153.Third-Party KUSF audits: Staff's calculations include \$45,280 for a financial audit16and an Agreed Agreed-Upon-Procedure (AUP) review of the KUSF administrator's17internal controls and contractual compliance,²⁴ comprised of: (1) \$21,880 to18perform a KUSF financial audit; (2) \$20,600 to perform the AUP review; and (3)19\$2,800 for costs related to travel to GVNW's offices. These costs are based on the20Commission's Contract with Berberich, Trehan, & Company (BT&Co.) to perform21a KUSF financial audit and AUP review.²⁵

22 IV. KUSF RESERVE

23 Q. Please explain how the projected KUSF Reserve was determined.

- A. Pursuant to K.S.A. 66-2008(a) and Commission Order,²⁶ any monies anticipated to be in
- 25 the KUSF as of February 28, 2018, are to be used to reduce the next year's KUSF
- 26 obligations. As shown in Attachment G, the February 2018 ending KUSF balance is

http://da.ks.gov/purch/Contracts/Default.aspx/000000000000000000039249.

²⁴ Docket 94-478, October 30, 1998, Order: (A) The Wireless Providers are Regulated by the Commission With Regard to the KUSF; (B) An Independent Third Party Will Be Selected and Bound by Protective Order to Review Staff's Calculations in Arriving at the KUSF Assessment; (C) CURB Shall Have Access to the Same Information Used by Staff; (D) Staff Shall File Supplemental Direct Testimony; (E) Procedural Schedule is Amended; (F) Commission Clarification of Para. 120 of the December 27 Order; (G) Commission Directs the KUSF Administrator to Start Conducting Audits in Compliance With K.S.A. 66-2010(b); and (H) An Annual Audit of the Financial Statements of the KUSF and a Separate Annual Review of the Internal Control Structure Employed by NECA Shall Be Required, ¶56.

²⁵ The KCC's Contract with BT&Co. may be viewed at:

²⁶ Docket 00-236, Order No. 5, ¶ 26.

1 estimated to be \$2.6 million. The Reserve balance is based on the actual March through 2 October 2017 KUSF operational results and the projected KUSF revenues, receipts, and 3 disbursements for the months of November 2017 through February 2018.

4 0.

How were the projected revenues developed?

5 A. The projected revenues are based on the revenue reported by each carrier for the months 6 of March through October 2017, and are compiled by carrier category as follows: RLECs, 7 SWBT, and CenturyLink (Attachment H); wireless providers (Attachment I); 8 Interconnected Voice over Internet Protocol (VoIP) providers (Attachment J); and 9 interexchange (IXC), and other providers (Attachment K). Attachments H through K are 10 confidential. Revenue projections were only done for companies known to be operating, 11 although some of these companies may be delinquent with their KUSF obligations.

12 The majority of companies report on a monthly basis and, therefore, Staff calculated the 13 average monthly revenue reported for the months of March through October 2017. Then, 14 Staff compared the monthly average revenue to the actual month's revenue reported for August, September, and October 2017. Staff's calculations include the monthly average 15 16 revenue as the projected revenue for the months of November 2017 through February 2018, 17 unless the actual revenue reported for two of the three months was lower than the monthly 18 average. If two months' actual revenue was less than the monthly average, Staff's 19 calculations include the lowest revenue reported in the three month period. For example, 20 the monthly average revenue for a company that reported \$100,000 of total revenue for 21 March through October 2017, is \$12,500 per month. If, however, the company reported 22 \$12,000 for August, \$12,700 for September, and \$12,250 for October, Staff's calculations

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1		reflect the lowest revenue (\$12,000 reported for August) for the monthly projected revenue
2		for the months of November 2017 through February 2018. This approach recognizes when
3		company has reported revenue declines, while also recognizing when a company has
4		reported revenue that has remained steady or increased.
5		For a company that reports revenue and pays assessments on a quarterly basis, Staff's
6		calculations assume the company will report the same amount of revenue for December
7		2017 through February 2018 (the fourth quarter) as the company reported for the third
8		quarter (September through November 2017). Companies that report revenue on an annual
9		or semi-annual basis have already reported their estimated revenue for the year, therefore,
10		no further revenue projections are necessary.
11	Q.	How did Staff calculate the KUSF receipts for the months of November 2017 through
11 12	Q.	How did Staff calculate the KUSF receipts for the months of November 2017 through February 2018?
	Q. A.	· · · · · · · · · · · · · · · · · · ·
12	_	February 2018?
12 13 14	_	 February 2018? The projected receipts were calculated as follows: KUSF assessments were calculated by multiplying each month's projected revenues by
12 13 14 15 16 17	_	 February 2018? The projected receipts were calculated as follows: KUSF assessments were calculated by multiplying each month's projected revenues by the current 7.25% KUSF assessment rate; and Interest and other miscellaneous revenues, including penalties assessed to companies for KUSF payment or reporting delinquencies,²⁷ reflect the average monthly revenue
12 13 14 15 16 17 18	_	 February 2018? The projected receipts were calculated as follows: KUSF assessments were calculated by multiplying each month's projected revenues by the current 7.25% KUSF assessment rate; and Interest and other miscellaneous revenues, including penalties assessed to companies for KUSF payment or reporting delinquencies,²⁷ reflect the average monthly revenue for the months of March through October 2017.
12 13 14 15 16 17 18 19	_	 February 2018? The projected receipts were calculated as follows: KUSF assessments were calculated by multiplying each month's projected revenues by the current 7.25% KUSF assessment rate; and Interest and other miscellaneous revenues, including penalties assessed to companies for KUSF payment or reporting delinquencies,²⁷ reflect the average monthly revenue for the months of March through October 2017. Other KUSF receipts include prior period adjustments and interest and miscellaneous

²⁷ Docket No. 94-GIMT-478-GIT, Feb. 19, 1997 Order; Docket No. 06-GIMT-332-GIT, Jan. 23, 2006 Order; and Docket No. 10-GIMT-188-GIT, Jan. 23, 2010 Order.

1	write-offs or retentions are also based on company-specific balances approved to be
2	written-off the KUSF books and records. Thus, given the intermittent nature of both prior
3	period adjustments and revenue write-offs and retentions, Staff did not include any
4	projections for these two revenue categories.

5 Q. Please explain how the monthly KUSF disbursements were calculated.

- 6 A. The projected monthly disbursements generally reflect the average monthly disbursement
- 7 based on the actual disbursements for the months of March through October 2017
- 8 disbursements. The projected monthly disbursements include:
- 9 high-cost support of \$3.4 million, adjusted to reflect that CenturyLink will receive an additional \$19,033 of KUSF support each month for the months of November 2017 10 through February 2018.²⁸ Staff also included an adjustment to increase Rainbow's 11 12 annual KUSF support by \$57,091 per month, effective for February 2018.²⁹ An Order addressing the Joint Motion is not listed on the Commission's December 21, 2017 13 14 meeting calendar, there are no more Commission meetings scheduled for the remainder 15 of 2017, and the Commission must issue an Order no later than February 2018. 16 Therefore, to ensure sufficient monies in the KUSF for the increase in Rainbow's 17 KUSF support, Staff assumed an order will be issued in January, with Rainbow 18 receiving an additional \$57,091 of monthly KUSF support, effective February 1, 2018.
 - TRS and TAP support of \$35,000 and \$14,000 monthly;
 - KLSP support of \$118,000 based on the six-month average, as previously explained in my testimony;
 - KUSF total administration expense comprised of: (1) \$15,829 for administration; (2) \$1,405 for internal control costs; and (3) \$185 for bank fees; and
 - audit expense of \$135,000 to reimburse GVNW for audit expenses incurred in July through December 2017.

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²⁸ Docket No. 16-GIMT-511-GIT, Dec. 12, 2017 Order.

²⁹ Docket 17-555, Nov. 9, 2017 Joint Motion.

1 V. CONTINGENCY FUND

2	Q.	Please explain how the \$2.9 million Contingency Fund was determined.
3	A.	The Commission determined in a January 2000 Order in Docket No. 00-GIMT-236-GIT ³⁰
4		to adopt an allowance for a contingency fund equal to 7.50% of the adjusted KUSF funding
5		obligations. As shown on Exhibit SKR-1, page 1, the adjusted KUSF fund obligations are
6		\$38.4 million, resulting in a \$2.9 million Contingency Fund Allowance.
7	VI.	ASSESSABLE REVENUE BASE
8	Q.	Please explain how the \$549.9 million intrastate revenue base that will be subject to
9		the KUSF assessment was determined.
10	A.	First, as previously discussed in my testimony, the November 2017 through February 2018
11		revenue was projected for each carrier to determine the total revenue carriers are projected
12		to reporting for KUSF Year 21. Please refer to confidential Attachments H through K, for
13		company-specific revenue projections. The total KUSF Year 21 projected revenue base of
14		\$617.8 million, shown on Attachment M, is comprised of: LECs - \$150.1 million; wireless
15		- \$296.4 million; VoIP - \$19.6 million; and IXC/ Others - \$151.7 million. Once the
16		projected KUSF Year 21 revenue was determined, the KUSF Year 22 projected assessable
17		revenue base was calculated by applying a revenue growth or reduction factor to the
18		projected KUSF Year 21 revenues for each specific carrier or carrier category. This
19		methodology results in total projected Year 22 revenues of \$549.9 million, comprised of:

³⁰ Docket 00-236, Order No. 5, ¶ 26.

LECs - \$139.3 million; wireless - \$253.4 million; VoIP - \$19.9 million; and IXC/ Others \$137.3 million.

The revenue growth or reduction factor for each carrier or carrier category is based on an analysis of the revenue reported for the years ended February 2015 through February 2017 and the KUSF Year 21 projected revenues to be reported through February 2018, as shown in confidential Attachment L. Staff's analysis relied on the annual and 2-year average revenue changes and the fact that the KUSF Year 21 revenue projections recognize revenue declines through the use of the "lower or average" methodology.

9 Attachment L shows the RLECs have reported annual revenue declines, with a projected 10 \$59,000 decline for between the years ended February 2018 and February 2017, for a 11 decline of .24%. The RLECs' average two-year revenue decline, based on the years 12 ended February 2017 and 2018, is \$438,000, or an average of 1.7%. By using the "lower 13 or average" methodology, the RLECs' projected monthly revenue, for the months of 14 November 2017 through February 2018, is \$2.0 million instead of \$2.1 million if the total 15 monthly average revenue were used in Staff's calculations. This means the "lower or 16 average" methodology results in the recognition of an average monthly revenue decline 17 of \$72,000 per month, for a total of \$287,000 within the projected KUSF Year 21 18 revenues. By applying a minimal .25% revenue decline factor for the RLECs, Staff's 19 calculations recognize an annual revenue decline of \$61,000. Thus, the projected revenue 20 decline factor exceeds the current .24% annual decline (\$59,000) and results in a Staff's 21 calculations incorporating a total revenue decline of \$348,000 (\$61,000 + \$287,000).

1 This same approach was applied for SWBT and CenturyLink, as shown in confidential 2 Attachments H and L. SWBT's annual revenue declines have ranged between 6.8% and 3 12.6%, with a recent two-year average decline of 10.5%. Applying the "lower or average" 4 methodology results in SWBT's KUSF Year 21 revenues incorporating a \$1.8 million 5 revenue decline, thus, applying an 8.5% revenue decline factor results in the projected 6 KUSF Year 22 revenues approximating the actual revenue decline SWBT has reported. 7 CenturyLink's annual revenue declines range from 4.5% up to 8.8%, with a recent two-8 year average decline of 8.6%. The use of the "lower or average" methodology results in 9 CenturyLink's KUSF Year 21 revenues including a projected a \$394,000 revenue decline. 10 By applying an 8.5% revenue decline factor results in the total projected KUSF Year 22 11 revenues reflecting an annual revenue decline that is within a reasonable range of what 12 the Company has reported.

13 The analysis and revenue projections for the wireless and VoIP providers are also shown 14 in confidential Attachment L. The wireless industry continues to report substantial 15 annual revenue declines, with an estimated decline of \$54.2 million, or 15.5%, this year. 16 The wireless carriers' annual revenue declines, ranging between 12.0% and 15.5%, has 17 resulted in a recent 2-year average decline of 13.7%, or \$51.0 million a year. Staff's 18 KUSF Year 21 revenue projections incorporate a \$6.5 million annual revenue decline by using the "lower or average" monthly methodology. Applying a 14.5% revenue decline 19 20 factor results in an annual decrease in wireless carrier revenue by \$43.0 million, or a total 21 revenue decline of \$49.5 million.

22 Q. Why have wireless revenues subject to the KUSF declined?

A. Due to the continued reported decline in industry revenue, Staff and GVNW have
discussed the issue, on a company-by-company basis, to gain an understanding of why
wireless carriers have continued to report declining revenues. In general, wireless
carriers state their subscribers continue to use a larger percentage of their wireless
services for data-related services; not voice service. This means the carriers allocate more
revenue to data services, which is not assessable for KUSF purposes, and allocate less
revenue to the assessable voice services.

8 Q. Did Staff include any revenue growth or decline factor for the VoIP and IXC/Other
9 carriers?

10 Yes. As shown in confidential Attachment L, the VoIP industry is expected to report a A. 11 slight growth in revenue of \$100,000, or .5%, this year. VoIP providers have reported 12 annual revenue growth ranging from the projected .5% for this year up to 5.5% last year, 13 with a recent two-year average revenue growth of 3.0%. By using the lower or average 14 monthly revenue methodology, a \$192,000 revenue decline is included in Staff's 15 projections for the VoIP industry, however, VoIP providers have reported annual revenue 16 growth ranging from the estimated \$100,000 for this year to \$640,000 last year. Thus, 17 Staff applied a 1.5% revenue growth factor, resulting in a \$294,000 growth, or a net 18 increase of \$102,000 (\$294,000 - \$192,000).

The IXC/Other carriers reported nominal revenue growth of .7% between the years ended February 2015 and 2016; however, since then, they have reported annual revenue declines of 9.7% and 10.0% and a recent 2-year average revenue decline of 9.9%. The total annual decline for this year is estimated to be \$15.3 million and the reported decline

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1		for last year was \$18.0 million. The lower or average monthly revenue methodology
2		results in a \$2.0 million revenue decline being recognized in the KUSF Year 21
3		projections, therefore, by applying a 9.5% revenue decline factor results in a total revenue
4		decline of \$16.4 million being recognized in the projected KUSF Year 22 revenue for the
5		IXC/Other providers.
6	Q.	What impact does the application of a revenue growth or reduction factor have on
7		the KUSF?
8	A.	Attachment M shows Staff's revenue projections for KUSF Years 20 and 21 and indicates
9		Staff's projections have been fairly accurate over the years. KUSF Year 20, effective
10		March 2016 through February 2017, is the most recent year for which complete revenue
11		data is available. The 6.53% KUSF Year 20 assessment rate was based on a projected
12		assessable revenue base of \$729.9 million. In comparison, actual KUSF Year 20 revenue
13		reported was \$698.8 million, a difference of \$31.1 million. If the actual KUSF Year 20
14		revenue of \$729.9 million could have been used to calculate the assessment, the KUSF
15		Year 20 assessment rate would have been 6.82%, an overall difference of twenty-nine
16		hundredths of a percent (.29%).

For KUSF Year 21, Staff projects carriers will report a total of \$617.8 million in assessable revenue. If no revenue growth or decline factors were recognized in Staff's projections, the proposed KUSF assessment rate for KUSF Year 22 would be 6.67%. However, as discussed, Staff's projected revenue calculations include revenue growth or decline factors, resulting in projected KUSF Year 22 revenue of \$549.9 million, or a decrease of

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8	Q.	Does this conclude your Direct Testimony?
7		million projected last year.
6		KUSF Year 21 revenues will be \$617.8 million, or \$21.9 million less than the \$639.7
5		carriers are projected to report for the year. This analysis shows Staff now projects the
4		used to calculate the current 7.25% assessment rate compared to the current revenues
3		Attachment M also includes a comparison of the projected KUSF Year 21 revenue base
2		two one-hundreds of a percent (.82%), to 7.50%.
1		\$67.8 million. This means the proposed KUSF Year 22 assessment rate is increased eighty

9 A. Yes.

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

In the Matter of the Investigation to Determine) the Assessment Rate for the Twenty-Second Year of the Kansas Universal Service Fund, Effective March 1, 2018.

Docket No. 18-GIMT-084-GIT

REDACTED (PUBLIC)

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Exhibit SKR-1

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Attachments

to the Direct Testimony of

SANDRA REAMS

ON

BEHALF OF THE

KANSAS CORPORATION COMMISSION STAFF

December 19, 2017

Calculation of Year 22 KUSF Assessable Revenue (March 2018 - Feb. 2019)

Line	Description	Explanation		Year 22
	KUSF Obligations:			(3/1/2018)
1	Rural LECs	Rural LECs' KUSF support (Attachment A).	S	29,257,627
2	United-Kansas d/b/a CenturyLink	CenturyLink's KUSF support (high-cost support, CAF II offset, and intrastate access reduction recovery). Subject to True-up (confidential Attachment B).		9.064.904
3	Nex-Tech, Inc.	Nex-Tech, Inc.'s KUSF support (Attachment C).		-
4	H&B Cable	H&B Cable's KUSF Support (Attachment C).		-
5	Nex-Tech Wireless	Nex-Tech Wireless' KUSF support (Attachment C).		-
6	United Wireless Communications (1)	United Wireless Communications' KUSF support (Atlachment C).		-
7	Epic Touch Co. (Note 1)	Epic Touch's KUSF support (Attachment C).		-
8	Westlink Communications (1)	Westlink's KUSF support (Attachment C).		-
9	NE Colorado d/b/a Viaero Wireless	N.E. Colorado Cellular d/ba/ Viacro's KUSF support (Attachment C).		-
10	Big River	Big River Telephone's KUSF support (Attachment C).		-
11	Telecommunications Relay Service (TRS)	TRS budget (Attachment D).		420.722
12	Telecommunications Access Program (TAP)	TAP budget (Attachment D).		227,813
13	Kansas Lifeline Service Program (KLSP)	KLSP budget (AttachmentE)		1,438.951
14	Administration and Audits (GVNW, carrier audits, and third-party audits)	Day-to-day administration, carrier audit costs, and third-party KUSF financial & Agreed-Upon-Procedures audit costs (Attachment F).		552,859
15	Gross KUSF Obligation	The sum of lines I through 14	s	40,962,876
16	Less: Projected Year 21 Ending Reserve	Estimated Reserve (Attachment G).	_	2,616.480
17	Adjusted KUSF Obligation	Adjusted KUSF monies to collect prior to Contingency Fund. Sum of Lines 15 and 16	S	38,346,395
8	Plus: Contingency Allowance	Equal to 7.50% of Adjusted Funds (Docket No. 00-GIMT-236-GIT, Jan. 19, 2000, Order)		2,875,980
19	Net KUSF Obligation	Line 17 plus Linc 18	S	41,222,375

Calculation of Year 22 KUSF Assessable Revenue (March 2018 - Feb. 2019)

Line	Description	Explanation		Year 22	
	RETAIL REVENUES:			3/1/2018	
1	Rural LECs	Provided by GVNW. Based on revenue reported by Rural LECs and Staff projections. (Confidential Attachments H & L)	S	24,393.890	
2	SWBT	Provided by GVNW. Based on revenues reported by SWBT and Staff projections. (Confidential Attachments H & L)	**	-,F = 1	*
3	CenturyLink	Provided by GVNW. Based on revenues reported by CenturyLink and Staff projections. (Confidential Attachments B, H, & L)	**		*
4	Wireless Providers	Provided by GVNW. Based on revenues reported by wireless carriers and Staff projections. (Confidential Attachments I & L)		253,426,216	
5	VoIP	Provided by GVNW. Based on revenues reported by VoIP providers and Staff projections. (Confidential Attachments J & L)		19,859.593	
6	IXCs/Others	Provided by GVNW. Based on revenues reported by IXC/Other carriers and Staff projections. (Confidential Attachments K & L)		137,292.512	
7	Total Assessable Revenue Base	Sum of Lines 1-6.	s	549,917,497	

Calculation of Year 22 KUSF Assessable Revenue (March 2018 - Feb. 2019)

Line	Description	Explanation	
1	Net KUSF Obligations	From page 1, line 19	\$ 41,222,375
2	Total Assessable Revenue Base	From page 2, line 7	549,917,497
3	Proposed KUSF Assessment Rate	Line 1 divided by Line 2.	7.50%

0.1

Line	Company	Annual KUSF Support (12/1/17)				Other Known/Estimated Adjustments	Year 22 Total Annual KUSF Support Payable		
		()		(A)		(B)		$(\mathbf{C} = \mathbf{A} + \mathbf{B})$	
1	Bluestem	[a]	\$	-	\$	-	\$	-	
2	Blue Valley			671,850		5		671,850	
3	Columbus			123		-			
4	Craw-Kan			2,375,861		-		2,375.861	
5	Cunningham Elkhart			883.099 15.392		-		883,099	
0 7	FairPoint-M	[b]		15.392				15,392	
8	Golden Belt	[0]		609,983		-			
9	Gorham							609,983	
10	H&B			559,380 699,705		5		559,380	
11	Haviland	[c]		099.705				699,705	
12	Home	[0]		580,718				580,718	
13	JBN	[d]		691,082		(13,214)		677,868	
14	KanOkla	[u]		714,138		(15,214)		714,138	
15	LaHarpe	[e]		17,769		(22,941)		5,923	
16	Madison	[c]		234,499		(22,941)		234,499	
17	Mokan	ព្រ				5			
18	Moundridge	-		-		-		-	
19	Mutual	[ŝ]		226,435		-		226,435	
20	Peoples	[h]		521,336		(2,983)		518,353	
21	Pioneer	[11]				(2,965)		3,708,259	
-1 22	Rainbow	[i]		3,708,259 135,542		685.093		820,635	
23	Rural	[1]		2,741,950				2,741,950	
23 24	S & A			356,666		-		356,666	
						-		1,237,933	
25	S&T			1,237.933		-			
26 27	South Central			250,311				250,311	
	Southern Kansas	r;a		1,231,598		-		1,231,598	
28	Sunflower	[j]		-		-		245 170	
29	Totah			245,170		7		245,170	
31	Tri-County			1,369,146		-		1,369,146	
30	Tri-County - Council Grove			998,173		-		998,173	
32	Twin Valley			3,677,608		2		3,677,608	
33	United Telephone Assoc.			311,653		-		311,653	
34	Wamego			1,840,013				1,840,013	
35	Wheat State			639,225		-		639,225	
36	Wilson			751,002		-		751,002	
37	Zenda [k]			310,861		(5,780)		305,081	
	Total		S	28,606,357	# S	640,174	s	29,257,627	
	Statutory Cap Est. KUSF Year 22 Support		\$	30,000,000 29.257,627					
	Remaining Headroom		S	742,373					

Notes:

[a] Bluestem does not receive KUSF support (May 2, 2003 Order, Docket No. 01-BSTT-878-AUD).

[b] FairPoint does not receive KUSF support (Docket Nos. 05-GIMT-094-GIT / 06-FMCT-858-COC).

[c] Haviland does not receive KUSF support (Sept. 9, 2010 Order Docket No. 10-HVDT-288-KSF).

[d] JBN will fully recover its rate case expense, effective July 1, 2018, thereby reducing its annual KUSF support \$19,821 (June 13 Order and June 27, 2013 Amended Order, Docket No. 13-JBNT-437-KSF.

[c] LaHarpe will fully recover its rate case expense, effective July 1, 2018, thereby reducing its annual KUSF support S34.412. As the

expense exceeds the Company's annual support, the KUSF support will be reduced to zero (June 26, 2013 Order, Docket No. 12-LHPT-875-AUD). The S5.923 is the total amount the Company will receive for the months of March - June 2017.

(f) MoKan does not receive KUSF support (Jan. 12, 2004 Order, Docket No. 04-MKNT-364-AUD).

[g] Moundridge does not receive support (April 27, 2015 Order, Docket No. 15-MRGT-097-AUD).

[h] Peoples will fully recover its rate case expense, effective Dec. 1, 2018; thereby reducing its annual KUSF support \$11,932 (Nov. 5, 2013) Order, Docket No. 13-PLTT-678-KSF).

[i] Rainbow's annual KUSF support will increase effective Feb. 1, 2018 (Jan. 2018 Order, Docket No. 17-RNBT-555-KSF).

[j] Sunflower does not receive KUSF support (May 2, 2003 Order, Docket No. 01-SFLT-879-AUD).

[k] Zenda will fully recover its rate case expense, effective Aug. 1, 2018, thereby reducing its annual KUSF support \$9,909 (July 3,

2013 Order, Docket No. 13-ZENT-065-AUD).

Rural LECs' Recovery of Audit Expense (5 Year Amortization)

Line	Сотрапу		I	otal Audit Expense Recovery	E	ual Audit xpense ecovery	Recovery End Date		Year 22 Impact	Docket No.	Order Date
-				(A)		(B)	(C)	(D	= B/#Mo)	(E)	(F)
l	Bluestem										
2	Blue Valley										
3	Columbus										
4	Craw-Kan										
5	Cunningham										
6	Elkhart										
7	FairPoint-MO										
8	Golden Belt										
9	Gorham										
10	Н&В										
11	Haviland										
12	llome										
13	JBN	[a]	\$	99,105	\$	19,821	July 1, 2018	\$	(13.214)	13-JBNT-437-KSF	June 13, 26, 2013
14	Kanekla										
15	LaHarpe	[b]	\$	172,060	\$	34,412	July 1, 2018		(22,941)	12-LHPT-875-AUD	June 26, 2013
16	Madison										
17	Mokan				-	20 -02					1 27 2017
18	Moundridge		\$	152,965	\$	30,593	May 1. 2020		-	15-MRGT-097-AUD	April 27, 2015
19	Mutual	r 1	¢	50 ((0	¢	11.022	D 1 2010		(2,00.2)	12 DDI T (70 VCF	No. 5 2012
20	Peoples	[c]	3	59,660	\$	11,932	Dec. 1. 2018		(2,983)	13-PPLT-678-KSF	Nov. 5, 2013
21	Pioneer		\$	0.5 202	\$	17.070	Marsh 1, 2022		-	17-RNBT-555-KSF	Jan. 2018
22	Rainbow [Est.]		Э	85,393	Э	17,079	March 1, 2023		-	17-KIND1-333-KSF	Jan. 2018
23	Rural S & A										
24	S & T		G	00 261	\$	17,872	Dec. 1, 2019			14-S&TT-525-KSF	Nov. 20, 2014
25	S & I South Central		\$	89,361	Э	17,072	Dec. 1, 2019		-	14-3@11-323-K3P	1000.20,2014
26	South Central Southern Kansas										
27	Sunflower										
28 29	Totah										
31	Tri-County										
51	Iri-County - Council										
30	Grove										
32	Twin Valley		\$	212,480	\$	42,496	May 1, 2020			15-TWVT-213-AUD	Oct. 27, Dec. 10, 2015
33	United Telephone Assoc.										
34	Wamego		\$	169,014	\$	33,803	March 1, 2019			14-WTCT-142-KSF	Feb. 25,2014
35	Wheat State										
36	Wilson										
37	Zenda	[d]	\$	49,545	\$	9,909	August 1, 2018	\$	(5,780)	13-ZENT-065-AUD	July 3, 2013

Notes:

[a] JBN will fully recover its rate case expense, effective July 1, 2018, thereby reducing its annual KUSF support \$19,821 (June 13 Order and June 27, 2013 Amended Order, Docket No. 13-JBNT-437-KSF.

[b] LaHarpe will fully recover its rate case expense, effective July 1, 2018, thereby reducing its annual KUSF support \$34,412. As the expense exceeds the Company's annual support, the KUSF support will be reduced to zero (June 26, 2013 Order, Docket No. 12-LHPT-875-AUD).

[c] Peoples will fully recover its rate case expense, effective Dec. 1, 2018; thereby reducing its annual KUSF support \$11,932 (Nov. 5, 2013 Order, Docket No. 13-PLTT-678-[d] Assumes the Commission will adopt the Nov. 2017 Joint Motion via an order issued in January 2018. Docket No. 17-RNBT-555-KSF.

[e] Zenda will fully recover its rate case expense, effective Aug. 1, 2018, thereby reducing its annual KUSF support \$9,909 (July 3, 2013 Order, Docket No. 13-ZENT-065-AUD).

Calculation of RLECs' KUSF Year 22 Support Cap (K S.A. 66-2008)

Line	Сопрацу		nthly KUSF Support (3/1/18) (a)	Mar-18 (b = a)	Apr-18 (c = a + b)	May-18 (d = a + c)	Jun-18 (c = a + d)	July 2018 Adjusted Support (Audit Exbease Recovery) (f)	Jul-18 $(g = a + c or$ $a + f)$	Aug. 2018 Adjusted Subbort (Audit Expense Recovery) (b.)	Aug-18 ($f = a + g; f + g;$ or $h + g$)	Sep-18 (j = a + 1 or h + i)	$Ovi \cdot 18$ $(k = a + j; f + j;$ or h + j)	Nov-18 ($1 = a + k$; $f + k$; or $h + k$)	Dec. 2018 Adjusted Support (Auth Expense Recovery) (m)		Jan-19 (o = a + n; f + n; b + n = c = m + n;	2/1/2019 (Cumulative Total) (p = a + o; f + o; h + o; or m + o)
1	Blucstom	(a) \$	- 5			s - s	Sec. 1991. 1999.		s -	(11)	5 -				(111)	s -		
2	Blue Vailey	tol .	55.988	55,988	11.975	167,963	223,950		279,938		335,925	391,913	447,900	503,888		5.59.875		10 D
3	Columbus					-								-			-	
4	Craw-Kan		197,988	197,988	395,977	593,965	791,954		989.942		1.187.931	1.385,919	1,583.907	1.781.896		1,979,884	2,177,873	2,375,861
5	Cumpingham		73.592	73,592	147,183	220,775	294.366		367,958		111.550	515,141	588,733	662,324		735.916		883.099
6	El khart		1,283	1,283	2,565	3,8-18	5,131		6.413		7.696	8,979	10.261	11,544		12,827	1.1,109	15.392
7	FairPoint-MO	ы				- * -												
8	Golden Beli		50,832	50,832	101,664	152,196	203.328		254,160		304.992	355.823	406,655	457.487		508,319	559,151	609,983
9	Gorbam		46,615	-16,615	93,230	139.845	186.460		233,075		279,690	326,305	372,920	419.535		466,150	512,765	559,380
10	Н&В		\$8,309	58.309	116.618	174,926	233,235		291,544		349,853	408,161	466,470	524.779		583,088	641,396	699,705
11		[c]	~				-		-					-			-	
12	Home		48,393	48,393	96,786	145.180	193.573		241,966		290.359	338,752	387,145	435,539		483,932	532,325	580,718
13	IBN		57,590	57,590	115,180	172,771	230,361	55,938	286.299		342.238	398,176	454,114	510,053		565.991	621.930	677,868
14	KanOkia		59.512	59,512	119,023	178,535	238,046		297.558		357,069	416,581	176,092	535,604		595,115	654,627	714,138
15	Lallarpe		1,481	1,481	2,962	4.442	5.923		5,923		5,923	5.923	5,923	5.923		5,923	5,923	5,923
16	Madison		19,542	19,542	39.083	58,625	78,166		97,708		117.250	136,791	156,333	175,874		195,416	214,957	234,499
17	Mokan	[d]									-			4		-		
18				2					2								÷	2
19	Mutual		18.870	18,870	37,739	56,609	75,178		94,348		113.218	132.087	150,957	169.826		188.696	207,565	226.435
20	Peoples		43,445	43,445	86.889	130,334	173,779		217,223		260,068	304,113	347.557	391,002	42,451	433,453	475,904	518,353
21	Pioneer		309,022	309,022	618,043	927.065	1,236,086		1,545.108		1,854,130	2,163,151	2,472,173	2,781,194		3,090,216	3.399,237	3,708,259
22	Rainbow	ເງ	68,386	68,386	136,773	205.159	273.545		341,931		410.318	478,704	\$47,090	615,476		683,863	752,249	820.635
23	Rural		228.496	228,496	456,992	685,488	913,983		1.142.479		1,370,975	1.599.471	1.827,967	2,056,463		2.284.958	2.513,454	2,741,950
24	S&A		29.722	29,722	\$9.4.1.1	89,167	118,889		148,611		178.333	208,055	237,777	267,500		297,222	326,944	356,666
25	S & T		103,161	103,161	206.322	309.483	412,644		515.805		618,967	722,128	825,289	928,450		1,031,611	1,134,772	1,237,933
26	South Central		20.859	20,859	\$1,719	62.578	83.437		104,296		125,156	146.015	166.874	187,733		208,593	229,452	250,311
27	Southern Kansas		102,633	102,633	205.266	307,900	410,533		513,166		615,799	718,432	821.065	923,699		1,026,332	1,128,965	1,231,598
28	Sunflower	[B]		1.1		-			-					-				
21)	Totah	(D)	20,431	20.431	-0,862	61,293	81.723		102,154		122,585	143,016	163,447	183,878		204,308	224.739	245.170
30	Tri-County		114,096	114.096	228,191	342,287	456,382		570.478		684.573	798,669	912.764	1.026,860		1.140,955	1.255.051	1.369,146
31	Tri-County - Council Grove		83,181	83,181	166,362	249,543	332.724		415,905		499,087	582,268	665,149	748,630		831.811	214.992	998,173
32	Twin Valley		306,467	306,467	612,935	919,402	1,225,869		1.532.337		1,838,804	2.145.271	2.451,739	2,758,206		3,064,673	3,371,141	3,677,608
33	United Telephone Assoc		25.971	25.971	51,942	77.913	103.884		129,855		155,827	181.798	207,769	233,740		259,711	285,682	3 11,653
34		[b]	153.334	153.334	306.669	460,003	613,338		766,672		920,007	1,073,341	1,226,675	1,380,010		1.533,344	1.686,679	1,840,013
35	Wheat State	tell	53.269	53,269	106,538	159,806	213.075		266.344		319,613	372.881	126,150	479,419		\$32,688	585.956	639,225
36	Wilson		62,584	62,584	125,167	187,751	250,334		312,918		375,501	438,085	500,668	563.252		625.835	688.419	751.002
37	Zenda		25,905	25,905	51,810	77,715	103.620		129,525	25,079	154,605	179,684	204,763	229,843		254,922	280.001	30 5.081
	Total	-	2.440.954						\$ 12,201,638					5 21,949,622				\$ 19.157.627

 Statutory Cap
 \$ 30,000,000

 March 1, 2018 Support
 29,257,627

 Remaining Headroom
 \$ 742,373

Calculation of RLECs' KUSF Year 21 Support Cap (K.S.A. 66-2008)

Сотряву	М	onthly KUSF Support (3/1/17) (a)	Mar-17 (b = a)	Apr-17 ($c = a + b$)	May-17 (d = a + c)	յաղ-17 (e = a + d)	July 2017 Adjusted Subbort (Access Adjustment) (D	Jul-17 (2 = c + f	Aug-17 $(h = f + g)$	Sep-17 $(i = f + h)$	Oct-17 (j = f + i)	Nov-17 (k = f + j)	Dec-17 (1= f + k)	Jan-18 (m ≈ ť + l)	Feb 2018 Adjusted Support (KUSF Audit) (n)	$\frac{2}{1} \frac{2}{2018}$ (Cumutartive Total) (o = f + m or m + n)
Bluestem	s			s -	115.5	(c = a + u) \$.		(11							(117	s -
Blue Vallev	1	56,250	56,250	112,500	168,750	225.000	55,988	280,988	336,975	392,963	448,950	50.1,938	560,925	616,913		672,900
Columbus		0	-				-			-						
Craw-Kan		198,279	198,279	396,557	594,836	793,115	197,988	991,103	1,189,091	1,387,080	1,585,068	1,783,057	1,981,045	2.179.033		2,377,022
Cunningham		73,606	73,606	147,213	220,819	294,425	73,592	368,017	441,608	515,200	588,792	662,383	735,975	809,566		883,158
Elkhart		1,316	1,316	2,633	3,949	5,265	1,283	6,548	7,831	9,113	10,396	11,679	12,962	14,244		15,527
FairPoint-MO		2			-	54 S		-		24		-	1.5	-		2
Golden Belt		51,007	51,007	102,014	153,021	204.028	50,832	254,860	305,692	356,524	407,356	458,187	509.019	559,851		610,683
Gorham		46,635	46,635	93,270	139,904	186,539	46,615	233.154	279,769	326,384	372,999	419,614	466.229	512,844		559,459
1 & B		58,336	58,336	116,671	175,007	233,343	58,309	291.651	349,960	408,269	466,578	524,887	583,195	641,504		699,813
laviland		2			1			4	-	-			-			
lonie		-18.430	48,430	96.860	145,290	193,720	48.393	2-12,11-1	2981,507	338,900	387,293	435,686	484,079	532,472		580,866
BN		57,644	57.644	115,288	172,931	230.575	57,590	288,165	345.755	403,346	460,936	518,526	576,116	633,706		691,296
KanOkla		59,591	59,591	119,182	178.774	238,365	59,512	297,876	357.388	+16,900	476,412	535,923	595,435	654,947		714,458
Lill larpe	[a]	1.481	1,481	2,962	4.4.12	5,923	1,481	7,-104	8,885	10,365	11,846	13,327	14,808	16,288		17,769
ladison		9.548	19,548	39,096	58,644	78,191	19,542	97,733	117,275	136.816	156,358	175,899	195,441	214,982		23.4,52.4
Mokan					-	~				-		2				
Moundridge		0		-		-		-	-	-		-				
Viutual		18,880	18.880	37,759	56.639	75,519	18.870	94,388	113,258	132,127	150,997	169,867	188,736	207.606		226.475
coples		43,453	43,453	86,906	130,359	173,812	43.445	217,257	260,702	304,146	347,591	391.036	434,480	477,925		521,369
oncer		309,022	309.022	618,043	927,065	1.236.086	309,022	1,545,108	1,854,130	2,163,151	2,472,173	2,781,194	3,090,216	3,399,237		3,708,259
Rambow		11,407	11,407	22,813	34,220	45,626	11,295	56.922	68,217	79.512	90,807	102,102	113,397	124,693	68,386	193,079
Rutal		261,298	261.298	522,596	783,894	1,045,191	228,496	1,273,687	1,502,183	1,730,679	1,959,175	2,187,670	2,416,166	2,644,662		2,873,158
i δt Λ		29,7-11	29,741	59,482	89,222	118,963	29,722	148,685	178,407	208,129	237,852	267,574	297,296	327,018		356,740
S & T		103,184	103,184	206,369	309,553	412.737	103,161	515,898	619,059	722.221	825,382	928,543	1,031,704	1,134,865		1.238.026
outh Central		20.920	20,920	41,840	62,760	83.680	20,859	104.539	125,398	146.257	167,117	187.976	208,835	229,694		250,554
outhern Kansas		102,675	102,675	205,350	308,024	410,699	102,633	513,332	615,965	718,598	821,232	923,865	1,026,198	1,129,131		1,231,764
Sunflower		-	-		-	-		-		-		-		-		
Cotalı		20,006	20,006	40,012	60,019	80,025	20,431	100,456	120,886	141,317	161,748	182,179	202,610	223,041		243,471
In-County		114,216	114,216	228,431	342,647	456.862	114,096	570,958	685,053	799,149	913,244	1,027,340	1,141,435	1,255,531		1,369,626
Fri-County - Council Grove		83.246	83,246	166,492	249,739	332.985	83.181	416,466	499,347	582,528	665,709	7.18,890	832,071	915,252		998,433
Twin Valley		306.763	306,763	613,526	920,289	1,227,052	306,467	1.533,519	1,839,986	2,146,454	2,452,921	2,759,388	3,065,856	3,372.323		3.678.790
United Telephone Assoc.		26,008	26,008	52,016	78.024	144,032	25,971	130,003	155,974	181,945	207,916	233,887	259,858	285,829		311,800
Wamego		153,388	153,388	306,776	460.164	613,552	153,334	766,887	920,221	1,073,556	1,226,890	1,380,224	1,533,559	1,686,893		1,8-10,227
Wheat State		53,364	53,364	106,728	160,093	213,457	53,269	266,725	319,994	373,263	426,532	479,800	533,069	586,338		639,606
Wilson		62,595	62,595	125,189	187,784	250,379	62,584	312,962	375,546	438,129	500,713	563.296	625,880	688,463		7.51.047
Zenda		25,908	25,908	51,815	77,723	103,630	25,905	129,535	155,440	181,345	207,251	233,156	259,061	284,966		310,871

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Notes;

[a] Docket No. 17-RNBT-555-KSF, A Commission Order addressing the the Joint Motion is not listed on the Commission's December 21, 2017 meeting calendar and no further meetings will be held until January 2018. The Commission must, however, issue an Order no later than February 2018. Therefore, to ensure the KUSF has sufficient monies to meet the increase in Rainbow's KUSF support. Staff assumed an order will be issued in January, with Rainbow receiving an additional \$57,091 of monthly KUSF support. effective February 1, 2018

		Fiscal	Year	11111	Calendar Ye	a r
Company	Docket No.	YR 21	YR 22	2017	2018	Total
Rainbow (2nd Audit)	17-RNBT-025-KSF	S 685,093		11111	S 685,093	\$ 685,093
Twin Valley Telephone (3rd Audit)	15-TWVT-213-AUD			11011		14,688
Moundridge Telephone, Inc. (3rd Audit)	15-MRGT-097-AUD					(244,028)
S&T Telephone (3rd Audit)	14-S&TT-525-KSF			111111		835,923
Wamego (2nd Audit)	14-WTCT-142-KSF			112121		1,869,326
People's (2nd Audit)	13-PLTT-678-KSF					374,945
CrawKan (2nd Audit)	13-CRKT-268-KSF					1,714,075
Zenda	13-ZENT-065-AUD					220,000
JBN (2nd Audit)	13-JBNT-437-KSF					559,332
LaHarpe	12-LHPT-875-AUD					(126,725)
Gorham	12-GRHT-633-KSF				1	390.000
S&T Telephone (2nd Audit)	12-S&TT-234-KSF			NULL I		(364,404)
Cunningham (2nd Audit)	11-CNHT-659-KSF			153115		481,406
Rainbow (2nd Audit)	II-RNBT-608-KSF					-
Pioneer (2nd Audit)	11-PNRT-315-KSF					1.751,449
United Tel Assn (2nd Audit)	10-UTAT-525-KSF					331,355
Golden Belt (2nd Audit)	10-GNVT-526-KSF					948,000
Haviland (2nd Audit)	10-HVDT-288-KSF			910110		(1,038,595)
Blue Valley (2nd Audit)	09-BLVT-913-KSF			1111		438,000
Twin Valley (2nd Audit)	09-TWVT-069-KSF					1,200,000
Mutual	09-MTLT-091-KSF					173,000
Columbus	08-CBST-400-KSF			111111		75,000
Moundridge (2nd Audit)	08-MRGT-221-KSF					600,000
People's	07-PPLT-1289-AUD					(40,000)
Madison	07-MDTT-195-AUD					(84,930)
Rainbow	06-RNBT-1322-AUD					30,000
Wamego	06-WTCT-1020-AUD					150,000
H&B	06-H&BT-1007-AUD	l í				188,215
Elkhart	06-ELKT-365-AUD					(385,326)
Cass County	05-GIMT-094-GIT			10101		(56,908)
South Central	05-SCNT-1048-AUD					(454,255)
Totah	05-TTHT-895-AUD			11112		(166,435)
Tri-County	05-TRCT-607-KSF					1.229,725
Cunningham	05-CNHT-020-AUD			11111		(179,097)
Kan®kla	05-KOKT-060-AUD					(9,686)
United Telephone Assn	04-UTAT-690-AUD					(731,611)
Council Grove	04-CGTT-679-RTS			111111		1.059,846
Golden Belt	04-GBNT-130-AUD					(1,600,187)
Twin Valley	03-TWVT-1031-AUD					405,134
	04-MKNT-364-AUD			1000		(1,189,640)
Mo-Kan Haviland	03-HVDT-664-RTS			100		201.679
	03-WHST-503-AUD					(172.614)
Wheat State	03-MRGT-1117-AUD					(1,126,112)
Moundridge				31411		(1,120,112) (235,000)
S&A	03-S&AT-160-AUD					(690,000)
JBN Blue Velley	02-JBNT-846-AUD					(564,945)
Blue Valley	02-BLVT-377-AUD			1911		
S&T	02-S&TT-390-AUD					(817,124)
Home	02-HOMT-209-AUD			C111		(33,410)
Wilson	02-WLST-210-AUD					(137,351)
Sunflower	01-SFLT-879-AUD					(1,629,482)
Bluestem	01-BSTT-878-AUD			11111		(342,087)
Pioneer	01-PNRT-929-AUD			CALLED IN CONTROL OF C		1.065,000
Craw-Kan	01-CRKT-713-AUD			NULLIN		(500.000)
Southern Kansas	01-SNKT-544-AUD			TINKS		(2.761,763)
Rural Telephone	01-RRLT-083-AUD					(723,614)
TOTALS		S 685.093	s -	S -	\$ 685,093	\$ 585,862

United Telephone Companies of Kansas d/b/a CenturyLink KS00001411 KUSF Support Calculation Worksheet Effective As Of 3/1/2018 Data Month Fiscal Year 2018/2019

					Iss	sue No. 37	
Description				Annual	1	Monthly	
United of Eastern/South Central SAC 411317 Estimated Gross KUSF Less: Estimated CAF II Offset Net KUSF: United of Eastern/South Central SAC	\$	8.600.779 (2.265.536)	\$	6,335,243	\$	527.937	(1) (2)
United of Kansas SAC 411842 Estimated Gross KUSF Less: Estimated CAF II Offset Net KUSF: United of Kansas SAC	\$	2,532,159 (885.911)		1,646,248		137,187	(1) (2)
Embarg MO SAC 411957 Estimated Gross KUSF Less: Estimated CAF II Offset Net KUSF: United of MO SAC	\$	152.821 (23.656)		129,165		10,764	(1) (2)
Net Cost-Based KUSF Support Payable to Company Plus: Access revenue Recovery-Docket No. 08-1023 Total Adjusted KUSF Support Payable to Company			\$ \$	8,110,656 954,248 9,064,904	\$ S	675,888 79,521 755,409	(3) (4) (5)
Assessment Rate		7.50%					(6)
Lifeline	S	7.77					
Per HB 2201, KUSF Support Capped at: KUSF Support, as of 2/28/2013 Or, Lesser of, or Cap	\$ \$ \$	Support 13,279,541 90% 11,951,587 11,400,000					

Notes:

1) Gross KUSF support for each study area is based on 9/30/2017 lines and Docket No. 99-GIMT-326-GIT high-cost model, Order Nos. 10 and 16

2) High Cost Model reflects the total company unseparated cost-based support. CAF II support received for the same household is an offset to the gross KUSF support. (K.S.A. 66-2008(c) and Docket No. 16-GIMT-511-GIT). Subject to CAF II support true-up for enabled eligible household locations as of December 2017.

3) Net cost-based KUSF support payable to Company for all study areas.

4) Revenue-Neutral KUSF Support for Intrastate access reductions, Docket No 08-GIMT-1023-GIT

5) Total adjusted KUSF Support Payable to Company

6) Docket No 18-GIMT-084-GIT, Jan. 2018 Order

Company: CenturyLink of Kansas

				As of Sept	ontora 30. 2017			HEREKEEPEIN		KUS	F/CAF2 Overlap	the second date				
		Theodelyout I	ZONE 1		1	ZONE 2	AT A LONG TON	100000000	Zon: 1			Zone 2	land and the second second	Zone 1	Zone 2	
Wire Center	Study Area	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed in WC after CAF2 Overlap	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	Total KUSF Needed is WC after CAF2 Overlap	KUSF Support Reduction (Annual)	KUSF Support Reduction (Annual)	Total KUSF Support Reductio (Annual)
Alta Vista	Eastern		\$ 18.19	and a second		\$ 100.01	A REAL PROPERTY.									
Altoona	Eastern		\$ 21.80			\$ 91.96										
Belle Plane	Eastern	(s -			\$ 31.13										
Benedict	Eastern		5 -			\$ 117.03										
Blue Mound Bucyrus	Eastern		\$ 40.47 \$ -			\$ 114.80 \$ 39.07	1	h.,								
Buffalo	Eastern		s .			\$ 70.97										
Centropolis	Eastern		5 .			\$ 69.73										
Circleville	Eastern		\$ 34.46			\$ 90.67										
Consas	Eastern	ř.	s -			\$ 98.49										
Coyville	Eastern		s -			\$ 88.71										
Delia	Eastern		s -			\$ 84.53										
Durison	Eastern		\$ 29.99			\$ 84.00										
Durham	Eastern	Y	\$.			\$ 103.19										
Easton Edgerten	Eastern	1	S 7.74			\$ 43.71 \$ 21.98		1								
Effingham	Eastern		\$ 4.01			\$ 59.56										
Emmed	Eastern		\$ 39.17			\$ 93.49										
Fall River	Eastern		s -			\$ 68.10										
Fontana	Eastern		s .			\$ 47.58										
Gardner	Eastern	1	s -			\$ 3.08										
Greeley	Eastern	1	\$ 8.04			\$ 66.26										
Gridley	Eastern	i -	\$ 14.80			\$ 109.86	4									
Harveyville Elession	Eastern		\$ 24.75			\$ 82.47 \$ 17.30										
Host	Eastern		\$ 5.81			\$ 45.96										
Innan	Eastern		\$ -			\$ 42.76										
Lafontation	Eastern		s -			\$ 125.45										
Lancaster	Eastern		\$ 4.09			\$ 51.05										
Lane	Eastern		s -			\$ 32.96										
Lebo	Eastern		\$ 2,99			\$ 77.37										
Lengh	Eastern	6	\$ 41.68			\$ 117.10										
Le Roy	Eastern Eastern		\$ 17.48 \$ 8.12			\$ 111.73 \$ 29.30	e 1									
Mapleton	Eastern		5 0.12			\$ 93.54		1								
Mayetta	Eastern		\$ 16.87			\$ 51.20										
Mc Louth	Eastern	i (1	\$ 3.77			\$ 50.21										
Meriden	Eastern		\$ 1.17			\$ 28.18										
Michigan Valley	Eastern		s -			\$ 86.39		6) - C								
Mound City	Eastern	0	\$ 1.71			\$ 53.47	1 A									
Neosho Falls Nortonville	Eastern		\$ - \$ 5.83			\$ 93.55 \$ 57.07										
Osage City	Eastern		5 5,65			\$ 37.89										
Overbrook	Eastern		\$ 1.30			\$ 54.24										
Oxford	Eastern		s -			\$ 49.26										
Ozankie	Eastern		\$ 7.56	4		\$ 38.45										
Parker	Eastern		\$ 12,16			\$ 67.36										
Perry	Eastern		\$ 0.15			\$ 36.68										
Piqua	Eastern		S -			\$ 117.23										
Princeton Quince	Eastern Eastern		\$ 8.28 \$ -			\$ 67.05 \$ 243.23										
Quincy Richmond	Eastern		\$ 9.84			5 243.23 5 69.69										
Rossville	Eastern		5 9.64			\$ 45.52										
Silver Lake	Eastern		s .			\$ 27.20		1								
Spring Hill	Eastern		\$ 0.41			\$ 21.46										
Saint Marys	Eastern		5 -			\$ 15.95										
Thayer	Eastern	i = 0	\$ 11.90			\$ 75.96										
Toronto	Eastern		\$ 14.09			\$ 80,33										
Walton	Eastern		\$ 12.47			\$ 70.57										
Welisville	Eastern	and the second division of	2 -	-		\$ 41.21	1	And in case of the local division of the loc				a long the second second second				

Calculation of Century Luck Cost-Based KUSF and CAF II support

Company: CenturyLink of Kansas

Number Number </th <th></th> <th></th> <th colspan="6">As of September 30, 2017</th> <th>States In States</th> <th colspan="6">KUSF / CAF2 Overlap</th> <th colspan="3"></th>			As of September 30, 2017						States In States	KUSF / CAF2 Overlap								
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			Supported	Support	Support	Supported	Support (Monthly)		CAF2 Funded	CAF2	Needed in WC after CAF2	Funded		Needed in WC after CAF2	Reduction		Total KUSF Support Reduct (Annual)	
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	SubTotal				\$ 50,210	L Inc Annual		\$ 2,481,949										
		Arcas			\$ 566,136											3,147,545 \$ 3,147,545	3,175 \$ 3,175	

		SF Year 19 (Eff	_			
		ear 18 Access	Ггие	e-1)p	_	
2-Month Volume	s 9/30/2	2014			S	1,434,317
Monthly Support						119,526
KUSF Per 9/30/20	15 Volu	umes			S	1.314,835
Monthly Support					S	109,570
		Subsidy		Subsidy		
Month:	_	Paid		Actual	I	Difference
Oct-14	S	112,533	S	109,570	S	(2,96)
Nov-14		112,533		109.570		(2.96
Dcc-14		112,533		109,570		(2,96
Jan-15		112,533		109,570		(2,96
Feb-15		112,533		109,570		(2,96)
Mar-15		118,780		109,570		(9,21
Apr-15		118,780		109,570		(9,21
May-15		1 18,780		109,570		(9,21
Jun-15		118,780		109,570		(9,21
Jul-15		118,780		109,570		(9,21
Aug-15		118,780		109,570		(9.21
Sep-15		118,780		109,570		(9,21
Annual Total	\$	1.394.126	S	1,314,835	S	(79,29
Annuar i Vtali	5	1,074,120	9	11. 14,0,0	3	(17.27
		15 Estimate	\$	1,434,317		
	True			(8.952)		
	5	isted (Pai'd)	S	1,425,365		
	Mon	thly	S	118,780		

		ear 20 (Ef	_			
		- 20 Acce	ss T	`rue-Up		
12-Month Volume	es 9/30/2015				\$	1.314,835
Monthly Support						109,570
KUSF Per 9/30/2	016 Volumes				S	1.108,691
Monthly Support					S	92,391
	Subs	idy		Subsidy		
Month:	Pai	d	_	Actual		Difference
Oc1-15	S	118,780	\$	92,391	S	(26,390
Nov-15		118,780		92,391		(26,390
Dec-15		118,780		92,391		(26.390
Jan-16		118,780		92,391		(26.390
Fcb-16		118,780		92,391		(26,390
Mar-16		102,962		92,391		(10.571
Apr-16		102,962		92,391		(10.571
May-16		102,962		92,391		(10,571
Jun-16		102,962		92,391		(10.57)
Jul-16		102.962		92,391		(10,571
Aug-16		102.962		92,391		(10,571
Sep-16		102,962		92,391		(10,571
Annual Total	S 1	314.637	S	1.108,691	\$	(205,946
			~			
	March 16 E		S	1,314,835		
	Year 19 Tr			(79,290)		
	Adjusted (T	rue-Up)	S	1.235,545		
	Monthly	-	\$	102,962		

		F Year 21 (Eff	_	,	_	
	Yea	r 20- 21 Acces	s T	rue-Up		
-Month Volume:	s 9/30/2	016			S	1.108.691
lonthly Support						92,391
USF Per 9/30/20	17 Volu	imes			\$	997.830
lonthly Support					S	83,152
		Subsidy		Subsidy		
Month:		Paid		Actual	I	Difference
Oct-16	S	102.962	S	83.152	S	(19,810
Nov-16		102,962		83,152		(19,810
Dec-16		102,962		83,152		(19.810
Jan-17		102,962		83,152		(19,810
Feb-17		102,962		83,152		(19,810
Mar-17		75,229		83,152		7,924
Apr-17		75,229		83,152		7,924
May-17		75,229		83,152		7,924
Jun-17		75,229		83,152		7,924
Jul-17		75,229		83,152		7,924
Aug-17		75.229		83,152		7,924
Sep-17		75,229		83,152		7,924
Annual Total	s	1,041,412	s	997,830	S	(43,582
	Mari	17 Estimate	s	1 108 (0)		
		20 True-Up	3	1,108.691 (205,946)		
		sted Pavable	S	902,745		
	Mon		S	75,229	2	
	NOI	uny		13,229		

	KUS	SF Year 22 (Ef	ff. 3/	1/2018)		
	Yea	r 21 - 22 Acce	ss T	rue-Up		
2-Month Volum	es 9/30/2	017			S	997.830
Ionthly Support					_	83,152
USF Per 9/30/2	018 Volu	mes				
Ionthly Support					S	-
	5	Subsidy	5	Subsidy		
Month:		Paid	_	Actual		Difference
Oct-17	S	75.229	S	-	S	-
Nov-17		75,229				-
Dec-17		75.229				-
Jan-18		75.229				-
Feb-18		75,229				-
Mar-18		79,521				2
Apr-18		79,521				÷
May-18		79,521				
Jun-18		79,521				-
Jul-18		79.521				-
Aug-18		79.521				90 A
Sep-18		79,521				
Annual Total	S	932,788	S		S	-
	March	18 Estimate	s	997,830		
		I Tiue-Up	0	(43,582)		
		ed Pavable	s	954,248	-	
	Monthl	-	S	79,521	-	
	1. Julia	5	_	1710.21	÷.	

Calculation of CETCs' KUSF Year 22 Support

Line	Description	KUSF Support (3/1/2013)		R	100% eduction	KUSF Support (3/1/2018)		
	Annual Percentage Reduction Year of KUSF support phase-out Total Reduction	20% 5 100%						
1	Nex-Tech, Inc.		\$	66,876	\$	(66,876)	\$	-
2	Sage Telecom, Inc. (1)			-		-		-
3	H&B Cable			150,152		(150,152)		-
4	Nex-Tech Wireless			7,725,163		(7,725,163)		-
5	United Wireless Communications (2)			1,483,831		(1,483,831)		-
6	Epic Touch Co. (2)			89,128		(89,128)		-
7	Westlink Communications (2)			1,278,443		(1,278,443)		-
8	NE Colorado d/b/a Viaero Wireless			229,452		(229,452)		-
9	Big River			116,823		(116,823)		-
10	Total		\$	11,139,868	\$ (11,139,868)	\$	-

Notes:

Sage Telecom, Inc. relinquished its wireline ETC designation to receive KUSF support (Oct. 18, 2016 Order, Docket No. 17-SAGT-100-ETC).

2 United Wireless Communications purchased Epic Touch (Docket No. 15-UWCC-355-ETC) and Westlink Communications (Docket No. 15-UWCC-029-ETC); thus, the related KUSF support is paid to United Wireless Communications.

Calculation of Telecommunications Relay Service and Access Program Funding

Telecommunications Relay Service:							By Activ	ity	Month									Monthly
·	Apr-17		May-17		Jun-17		Jul-17		Aug-17	Sep-17		Oct-17		Nov-17		Total		Average
Expense Paid by KUSF																		
Telecommunications Relay Service - Admin [a]	\$ -	S	-	\$	-	\$	3,496	\$	-	\$ 4,285	S	-	\$	-	\$	7.781	\$	1,297
Hamilton Relay Services	34,321		28,137		33,757		34.486		43,054	33,229		30.073		30,792		267,847		33,481
KUSF Year 20 True-Up	878															878		
(Nov. 16, 2016, Amendment 3)	 	_		_		_									_			
Total (Attachment G, p 4)	\$ 35,199	\$	28,137	S	33,757	\$	37,982	\$	43.054	\$ 37,514	\$	30,073	\$	30,792	\$	276,507	\$	34,778
ATK Contractual Costs / Estimated Relay Administration Costs (FY 3/17-2/18) Hamilton Relay Service - Annualized Monthly Average True-Up Allowance Total	\$ 18,072 401,771 878 420,722	-											Ann	nthly Average alized 2-Up 1	\$	34,778 417,332 878 418,211	-	

Telecommunications Access Program:								By Activ	ity N	lonth								Monthly
		Apr-17		May-17	J	un-17	_	Jul-17		Aug-17	Sep-17		Oct-17		Nov-17	Total		Average
Assistive Technologies of Kansas - Admin. [a]	\$	-	\$	-	\$	-	\$	15,877	\$	-	\$ 20,982	\$	-	\$	-	\$ 36,859	\$	6,143
TAP Equipment		13,007		7,765		7.030		5,606		7,593	8,156		9,855		5,279.26	65,291		8,161
KUSF Year 20 True-Up		9,456														 9.456		
Total (Attachment G, p. 4)	\$	22,463	\$	7,765	\$	7,030	\$	21,483	\$	7,593	\$ 29.138	S	9,855	S	6,279	\$ 111,606	\$	14,305
														Mo	nthly Average	\$ 14,305		
Contractual Costs/Estimated TAP Equipment														And	nalized	171.654		
Administration (FY 3/17 - 2/18)	S	120,421												Tru	e-Up	9,456		
PDA's		23,100												Tot	al	\$ 181,110		
TAP Equipment - Annualized Monthly Average		97,936															-	
True-Up Allowance		9,456																
Total	S	227,813	-															

A copy of the contract may be viewed at:

https://da.ks.gov/purch/Contracts/Default.aspx/0000000000000000000039049

Estimated TRS Administration	S	18,072
Estimated TAP Administration		120,421
PDA Allowance		23.100
Estimated Total TRS & TAP Administration	\$	161,593
Not to Exceed Cost per Contract, Amendment 3	\$	167,671

Notes:

[a] ATK's administrative costs are billed each quarter; therefore, the calculation of the monthly average is based on the expense for the 6 month period of March -August 2017.

Docket No 18-GIMT-084-GIT Calculation of Kansas Lifeline Service Reams' Direct Program (KLSP) Funding Line Description 6-Month Average Linesper Month -Year 21 (from line 20) 15.130 1 2 Projected Line Growth (Decline) 2.0% 3 Estimated Line Growth 3()3 4 Projected Monthly Lifeline Eligible Lines-Year 22 (line 1 + 3) 15.433 5 Monthly Credit/Discount Per Linc 7.77 \$ 119,913 6 Monthly Lifeline Credits 7 Year 22 KLSP Funding \$ 1,438,951 8 KLSP credits as of Feb. 2017 (Year 20) lal \$ 1,386,168 Change in Percent 9 Average KLSP credits per month 115.514 No. Lines Line Change Funding Change 10 Year 18 - 20 (5,243)-44.04% \$ (488.848)Equivalent No. of Lines supported (\$7.77/line) 14,867 11 KLSP credits as of Feb. 2016 (Year 19) \$ 1,109,991 [b] 12 Average KLSP credits per month 92,499 13 Year 19 - 20 2,962 14.73% \$ 276,177 Equivalent No. of Lines supported (\$7.77/line) 11,905 14 KLSP credits as of Fcb. 2015 (Year 18) [c] \$ 1,875,016 15 Average KLSP credits per month 156,251 16 Equivalent No. of Lines supported (\$7.77/line) 20,110 Year 18 - 19 (8.205) -40.80% \$ (765, 025)STREETS COLUMN STREETS IN THE OWNER OF Change in Percent KLSP Credits - March - Oct 2017 Total $\left[d \right]$ \$ 980,574 No. Lines Line Change Funding Change 17 KLSP Credits - 8 Months' Average \$ 122,572 Projected Yr. 21-908 18 Equivalent No. of Lines supported (\$7.77/line)/Month 15,775 Yr, 20 6.11% \$ 84,693 19 Annualized KLSP Credits \$ 1,470,861 (Line 18 - line 9) KLSP Credits - May - Oct. 2017 Total \$ 705,368 20 KLSP Credits - 6 Months' Average 117,561 Projected Yr. 21-21 15.130 Yr. 20 263 1 77% \$ Equivalent No. of Lines supported (\$7.77/line) 24,569 22 Annualized KLSP Credits \$ 1,410.737 (Line 21 - line 9)

22 KLSP Credits - Aug. - Oct. 2017 Total \$ 315,042 23 KLSP Credits - 3 Months' Average \$ 105,014 Projected Yr. 21-24 13,515 Equivalent No. of Lines supported (\$7.77/line) Yr. 20 (1,351)-9.09% \$ (125,998)25 Annualized KLSP Credits \$ 1,260,170 (Line 24 - line 9)

Notes:

(a) KUSF operational results for March 2016 - February 2017 Fiscal Year (Docket No. 16-GIMT-067-GIT)

[a] KUSF Operational Results for the March 2015 - February 2016 Fiscal Year (Docket No. 15-GIMT-073-GIT).

[b] KUSF Operational Results for the March 2014 - February 2015 Fiseal Year (Docket No. 14-GIMT-105-GIT)

[d] Operating results for the period of March - October 2017.

Exhibit SKR-1

Attachment E Page 1 of 2

2 Year

Average

Line Change

(1.140)

(2,621)

Percent

Change

-14.66%

-13.04%

C	Activity Month	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	_
Company Name	Data Month	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Total
Bluestem Telephone Company				\$ 54	\$ 47	\$ 47	\$ 47	S 47	S 47	\$ 396
Blue Valley Telecommunications		311	287	287	256	241	241	225	233	2.082
One Point Technologies		179	186	179	171	163	163	148	148	1,336
Columbus Communications Servi		186	210	194	194	171	186	148	140	1,430
Tri-County Telephone-Council G	rove Study Area	365	365	350	342	342	342	311	311	2,727
Craw-Kan Telephone Co-op Inc		1,919	1,950	2.005	1,981	2,005	2,012	1,958	1.911	15.742
Cunnmgham TelephoneCompany	/ Inc	218	225	218	210	218	218	225	225	1,756
Elkhart Telephone Company		117	109	109	109	101	109	109	109	870
Golden Bell Telephone Associatio	on Inc	769	777	785	785	785	769	761	824	6,255
Gorham Telephone Company		62	62	62	62	62	62	70	62	505
H & B Communications Inc		93	93	85	85	78	78	78	78	668
Haviland Telephone Company		995	987	971	979	940	901	894	894	7,560
JBN Telephone Company Inc		256	256	225	225	225	218	194	202	1,803
Kanokla Telephone Association		490	490	490	474	490	474	451	443	3.800
LaHarpe Telephone Co		280	303	303	303	311	295	303	295	2,393
Madison Telephone LLC		163	163	163	163	155	155	148	148	1.259
Mokan Dial Inc		559	567	567	559		1,018	458	466	4,196
Moundridge Telephone Company		303	280	303	303	303	303	311	287	2,393
Mutual Telephone Company	0	23	23	23	23	23	23	23	23	186
Peoples Telecommunications, LL		412	404	420	427	435	420	412	412	3,341
PioneerTelephoneAssociationIn		1.197	1,228	1,212	1.228	1,228	1.197	1,181	1.150	9,619
Rainbow Telecommumcations As		148	155	155	155	155	155	163	163	1,251
RuralTelephone Service Co Incd	ba Nex-Tech	1,150	1.134	1,127	1.088	1,072	1.018	839	824	8,252
S & A TelephoneCompany Inc		435	435	435	420	412	412	412	396	3,357
S & T Telephone Coop Assn		357	357	350	342	381	365	381	350	2,883
S & T Communications		637	645	6.15	645	645	668	637	653	5.(75
South Central Telephone Assn Inc		78	85	78	78	85	85	70	70	629
Southern Kansas Telephone Com	panyinc	381	365	373	365	365	350	342	357	2.898
Suntlower Telephone Company		85	70 78	54 78	54 78	54 78	47 78	39 78	47 70	451
Totah Communications Inc		78								614
Tri-County Telephone Assn. Inc.		202	202	210	210	210	225	225	225	1,709
Twan Valley Telephone		443	443	443	435	412	435	427	420	3,458
UnitedTelephone Association	G	132	132 3.629	148	140	140	140	148	155	1.134
United Telephone of Kansas d/b/a		3,636		3,582	3.528	3,357	3.310	3.201	3,054	27.296
Warnego Telecommunications Co	lnc	241	249	241	233	218	202	194	186	1,764
Wheat State Telephone Inc		420 404	412 396	420 396	404	381	357	342 350	342 350	3,077
Wilson Telephone Company Inc						365	326			2,968
Zenda Telephone Company		16	16	16	16	16	16	16	16	124
Nex-Tech LLC Giant Communications Inc		1,810	1,787	1.803	1.740	1,694	1.709	1,593	1,523	13.660
		93	93	93	93	93	85	85	78	715
Your Tel America		112,152	108,392	107,397 47	106.604 47	95,78l 47	85.913 47	78,213	73,240 39	767,692 365
WTC Communications Inc Cox Kansas Telecom LLC		5,486	5,649	5,719	5,859	5,602	5,633	5,532	5,509	
		249	2.49	256	264	264	249	249	249	44,988
Rainbow Communications, LLC Cunningham Communications Inc		544	552	505	505	513		490	474	2.028
	,	738		505			482			
Nex-Tech Wireless LLC		738	567	132	598	622 233	629	645	660 233	5,035
IdeaTek Telecom, LLC	le e				218		218	218		1,608
United WirelessCommumcations	me	163	155	171	179	179	171	171	186	1.375
Twin Valley Communications		23	23	16	16	16	16	16	16	140
Viaero Wireless		194	218	225	132	171	186	171	171	1,469
Midcontinent Communications		-	-	-	- 131 763	- 131 00A		5 102 833	- -	5 080.674
Total (a)		\$ 139.518	\$ 135.688	\$ 134.693	\$ 133,753	\$ 121.880	\$ 112,758	\$ 103,823	\$ 98,461	\$ 980.574
		17 .05 -	17.1/2	10 000	17.2.4	16 100	1.1.510	12.2/3	13 (73	10 213
Supported Eligible Lines		17.956	17,463	17.335 -0.73%	-0.70%	15,686	14.512	13,362	12.672	10.517
Percent Monthly Change			-2.15%	-11/3/0	-17.70.70	*0.8870	-1.40/0	-1.7270	10.10	

Notes (a) Lifeline coulds requested by TAG Mobile. LLC were accrued, but not paid, effective December 2015 through October 2017 The Company has been directed to repay all Lifeline credits (\$942,299) to the KUSF on or before January 18, 2017 (Doeket No. 16-TAGC-323-SHO, Oct. 19, 2017 Order Revoking Tag Mobile's State and Federal ETC Designation).

Exhibit SKR-1 Attachment F Page 1 of 3

	Pi						
Line	Description		Reference				
1	Annual Administrative Costs	[1]	KCC/GVNW Contract,				
		[1]	June 14, 2016	\$	189,948		
2	Administrative Costs - SOC 1 Controls		Id.	_	16,859		
3	Total Annual Admin. Costs					\$	206,807
4	Carrier Audit Expense,		Aug. 8, 2017 Payment			đ	165 702
	Jan June 2017		Approval Letter			Э	165,703
	July - Dec. 17 Invoices:		work period				
5	Aug. 2, 2017		July 2017	\$	17,231		
6	Sept. 5, 2017		Aug. 2017		23,098		
7	Oct. 3, 2017		Sept. 2017		23,416		
8	Nov. 2, 2017		Oct. 2017		22,954		
9	Dec. 4, 2017		Nov. 2017	0	25,859		
10			Total	\$	112,558		
1.1	Plus: Estimated Jan. 2017 Invoice		Dec 2017 Evenerat (Eat)		22 512		
11	Estimated Jan. 2017 Invoice		Dec. 2017 Expense (Est) (Average lines 5-9)		22,512		
			(Average miles 5-7)				
	Total Estimated Expense (July - Dec.						
12	2017, Line 10 + 11)						135,069
	2017, Elle 10 · 11)						150,007
13	Total Annual Carrier Audit Expense					\$	300,772
15	(Line $4 + 12$)						
	(Line 4 + 12)						
	Berberich, Trehan, & Co.						
14	Financial Audit		Jan. 14, 2016 Amendment				
			to Contract [2]	\$	21,880		
15	Internal Control Audit		(KUSF FY ended 3/2018)		20,600		
16	Additional Costs (travel, etc.)				2,800		
17	Total KUSF Audit Costs					\$	45,280
	Total Estimated Annual KUSF Admin	nistr	ation and Audit Costs				
	(Line 3 + 13 + 17)					\$	552,859
	(To SKR-1, page 1, line 14)						
Notes:							
[1]	A copy of the contract may be viewed at: ht	tp://\	www.gvnw.com/USF/KansasUS	F.as	px.		
7 7	A copy of the contract may be viewed at:		-				
[2]	1	/00	000000000000000000000000000000000000000				

[2] http://da.ks.gov/purch/Contracts/Default.aspx/00000000000000000039249

Exhibit SKR-1 Attachment F Page 2 of 3



KUSF Audits Kansas Corporation Commission EMAIL: <u>s.reams@kcc.ks.gov</u> EMAIL: <u>k.mabon@kcc.ks.gov</u> EMAIL: <u>jushio@gvnw.com</u> - CC c/o GVNW Consulting, Inc. 3220 Pleasant Run Springfield, IL 62711

Invoice No: 34128

Invoice Date: December 4, 2017

For Professional Services Rendered through 11/30/2017

Fees:		
State USF Audit	\$25,081.89	#05 001 00
Travel & Other Expenses:		\$25,081.89
Ground Transportation Lodging Meals	212.51 393.59 170.95	\$ 7 77.05
Office Expenses:		<u>0.00</u>
Total An	nount Due:	\$25,858.94
Description		
	1/6 (10:30 A.M.) - 11/9 1:30 P.M.) DW 1/6 - 11/9 DW 1/6 - 11/9 DW	
Total amo	ount of this bill	\$25,858.94
	Account Summary	
Current Invoice Total: Previous Balance: Payments Received: TOTAL AMOUNT NOW DUE:		\$25,858.94 \$86,698.75 \$0.00 \$112,557.69

Exhibit SKR-1 Attachment F Page 3 of 3

> Phone: 785-271-3220 Fax: 785-271-3357 http://kcc.ks.gov/

Sam Brownback, Governor

Utilities Division 1500 SW Arrowhead Road Topeko, KS 66604-4027



Pat Apple, Chairman Shari Feist Albrecht, Commissioner Jay Scott Emler, Commissioner

August 8, 2017

Mr. Scott Smith, State Funds Manager GVNW Consulting, Inc. 2270 La Montana Way Colorado Springs, CO 80918

RE: KUSF Audit Invoices for work performed January 1 through June 30, 2017

Dear Scott,

This letter authorizes GVNW Consulting, Inc. (GVNW) to withdraw \$165,702.53 from the Kansas Universal Service Fund (KUSF) for carrier audit services performed between January 1 and June 30, 2017, consistent with Section IV.F.3 of the KUSF Administration contract between Kansas Corporation Commission and GVNW.

Staff's review of the invoices shows the expenses claimed by GVNW are appropriate and comply with the contract reimbursement policy.

Please contact Ms. Sandy Reams at (785) 271-3130 or myself at (785) 271-3221 if you have any questions concerning this letter.

Sincerely,

Jeff McClanahan Director of Utilities

cc: Christine Aarnes, Chief of Telecommunications Sandy Reams, Assistant Chief of Telecommunications Kelly Mabon, Telecommunications Analyst

SKR-I Attachment G Page | of 4

Activity Month	Apr-17	May-17	Jun-17	Jul-17
Data Month	Mar-17	Apr-17	May-17	Jun-17
Beginning Balance	\$ 1,068,205	\$ 1,436,212	\$ 1,621,712	\$ 1,855,830
Surplus/(Deficit), from page 2	368,007	185,500	234,117	410,492
Ending Balance	1,436,212	1,621,712	1,855,830	2,266,321
Activity Month	Aug-17	Sep-17	Oct-17	Nov-17
Data Month	Jul-17	Aug-17	Sep-17	Oct-17
Beginning Balance	\$ 2,266,321	\$ 2,693,195	\$ 2,702,782	\$ 2,684,882
Surplus/(Deficit), from page 2	426,873	9,586	(17,899)	106,231
Ending Balance	\$ 2,693,195	\$ 2,702,782	\$ 2,684,882	\$ 2,791,113

			***Pr	o jecte	(**		
Activity Month Data Month		Dec-17 Nov-17	 Jan-18 Dec-17		Feb-18 Jan-18		Mar-18 Feb-18
Beginning Balance Surplus/(Deficit), - from page 2	\$	2,791,113 <i>3,414</i>	\$ 2,794,526 11,772	\$	2,806,298 (133,898)	\$	2,672,400 (55,920)
Ending Balance	S	2,794,526	\$ 2,806,298	\$	2,672,400	S	2,616,480

To Exhibit SKR-1, In. 17

													Proj	ected		
Activity Month		Apr-17	Max-17	Jun-17	Jul-17	Aug-17	Sep-16	@c1-16	Nov-16	Mar - Oct 17		Dec-17	Jan-18	Feb-18	Mar-18	Anaual
Data Month		Mar-17	Apr-17	Max-17	Jun-17	Jut-17	Aug-17	Sep-17	Oct-17	Total	Average	Nox-17	Dec-17	Jan-18	Fcb-18	Totat
Revenues/ Receipts:																
ECs/Electing Carners												\$ 12.089,16-1	\$ 12,089,164	\$ 12,089,164	\$ 12.089.164	\$ 150,078,291
Wireless												23,625,835	23,629,130	23,619,073	23,619,073	296,404,930
nterconnected VolP												1.612.01.1	1,632,297	1,587,841	1.587 841	19,566,101
XC/Others												12,291,499	12,383,203	12,291,499	12.291.499	151.70-1.433
l'otal	\$	55.428,298 \$	53.025.933	\$ 53,152,241 \$	55,821,272 \$	52,133,792	\$ 50,246,678	\$ 48,822,159	50,369,371	\$ 418,999,745	\$ 52,374,968	\$ 49,618,512	\$ 49,733,794	\$ 49,587,577	\$ 49,587,577	\$ 617,753,756
Assessment Rate												7.25%	7.25%	7.25%	7.25%	
Fund Assessments	S	4.018.552 \$	3 844,380	\$ 3.853.537.44 \$	4.047.042 S	3,779,700	\$ 3.642.884	\$ 3.539.606	3.651.779	\$ 30,377 481	\$ 3,797 185	\$ 3,597,342	\$ 3,605,700	\$ 3,595,099	\$ 3,595,099	\$ 44,770,722
the hasasattens	4	1.010	3,044,000	9 Jul 9 10 10 10 1	4,017,042	2,117,100							2 510 0 0 0			
Prior Year Adjustments		(6.755)	(65,212)	3,412	1,481	394,477	(2)	(3,866)	(36)	323,500	40,437					\$ 323,500
Interest, Mise Rev.		2.878	27.420	2,153	4,710	5,817	3,508	5,253	3,626	55,365	6,921	6,921	6,921	6.921	6,921	83,048
Revenue Retention/ (Write-Offs)				(0)	1	280		31	•	311	39					311
KUSF Receipts	\$	4,014,675 \$	3,806,588	\$ 3,859,102.15 \$	4,053,234 \$	4,180,274	\$ 3,646,390	\$ 3,541,025	3,(155,369	\$ 30,756,658	\$ 3,844,582	\$ 3.604,263	\$ 3,612,621	\$ 3.602,020	\$ 3,602,020	\$ 45,177,582
Disbursements:																
High Cost Support		3,432,085	3,432,085	3,432,085	3,432,085	3.397.753	3.397.753	3,397,753	3,397.753	27,319,352	3,41-1,919	3,397,753	3,397,753	3,397,753	3,397,753	\$ 40.910.364
Additional Support- CenturyLink												19,033	19.033	19,033	19,033	76.132
Additional Support- Rainbow										-					57,091	57.091
TRS		35,199	28,137	33,757	37,982	43,054	37,514	30,073	30,792	276,507	3-4,563	34,778	34,778	34,778	34,778	1.15.617
TAP		22,463	7,765	7.030	21,483	7,593	29,138	9,855	6,279	111,606	13,951	1.1.305	14,305	14,305	14,305	168.824
KLSP		139,518	13.5,688	134,693	133,753	121,880	112,758	103,823	98,461	980,574	122,572	117.561	117,561	117,561	117,561	1,450,820
Administration (Net of Penallies)		17,23-1	17,234	17.23-1	17,234	17,234	17,234	17,234	15,651	136,288	17,036	17.234	17,234	17.234	17,234	205,224
Audit Fees(1)				-		165,703	42,237			207,940	25,992	-	-	135,969	-	343,009
Bank Fees		168	150	1#6	205	184	170	187	201	1,483	185	185	185	185	18.5	2,224
Certified Mail. Mise			-		*			-				+	-			-
Monthly Disbursements	\$	3.646.668 \$	3,621,088	\$ 3,624.985 \$	3,642,742	3,753,401	3.636,804	3,558,924	3,549,138	\$ 29.033.749	3,629,219	3,600,849	3,600,849	3,735,918	3,657,940	43,629,305
Operating Surplus/(Delicit)	s	368.007 S	185,500	\$ 234.117 \$	410.492 \$	426.873	\$ 9.586.44	\$ (17.899)	106.231	\$ 1,722,909	\$ 215,364	\$ 3.414	\$ 11,772	\$ (133,898)	\$ (55,920) \$	\$ 1,548,277

Notes: 1. Receptizes the estimated KUSF currer audit fee expenses for work performed by GVNW Fer July through December 2015.

Kansas Universal Service Fund Statement of Fund Performance - April 2017 Prepared for the Kansas Corporation Commission

			Activity for Apr-17		ar to Date Results or FY 2017-2018
ASSESSMENT BASIS		\$	55,428,297.77	\$	55,428,297.77
			55,120,27111	Ψ	55,120,271.11
FUND REVENUES				-	
Fund Assessments		\$	4,018,551.51	\$	4,018,551.51
Out of Period Adjustments			(6,755.01)		(6,755.01)
Late Payment Charges			1,049.08		1,049.08
Late Worksheet Penalties			900.00		900.00
Outstanding Balance Penal	ty		207.21		207.21
Account Write Offs			-		
Interest Income - Investmen	nt Account	-	722.13	-	722.13
Total Revenue		\$	4,014,674.92	\$	4,014,674.92
FUND DISBURSEMENT	rs				
KRSI		\$	35,199.16	\$	35,199.16
ТАР			22,463.11		22,463.11
Lifeline			139,518.12		139,518.12
High Cost Support			3,432,085.00		3,432,085.00
Audit Fees			-		-
Certified Mail Fees			-		-
Program Administration			17,233.92		17,233.92
Bank Fees			168.45		168.45
Total Disbursements		\$	3,646.667.76	\$	3,646,667.76
MISCELLANEOUS INC Administrator Penalty	C(EXP)		-		
Total Miscellaneous					-
Operating Surplus / (Defici	t)	\$	368,007	\$	368,007
	Fund Balances for A	Anril	2017	No of States	
	Beginning Fund Balance	s \$	1,068,205		
	Operating Surplus (Deficit)	U.	368,007		
	Ending Fund Balance	\$	1,436,212		
	TAG Mobile Accrual Liability		(242,478)		
	Ending Fund Balance w/Liability	\$	1,193,733		
5/18/2017	Prepared by GVNV Reviewed by		-		

Kansas Universal Service Fund

Statement of Fund Performance - November 2017 Prepared for the Kansas Corporation Commission

			Activity for Nov-17		ar to Date Results or FY 2017-2018
ASSESSMENT BASIS Intrastate Revenue		\$	50,369,371.43	\$	418,999,744.71
FUND REVENUES					
Fund Assessments		\$	3,651,779.48	\$	30,377,481.49
Out of Period Adjustments			(36.42)		323,499.69
Late Payment Charges			218.22		17,643.81
Late Worksheet Penalties			1,300.00		23,862.20
Outstanding Balance Penalty			94.02		1,701.68
Account Write Offs			-		311.27
Interest Income - Investment Acc	ount		2,013.50		12,157.80
Total Revenue		\$	3,655,368.80	\$	30,756,657.94
FUND DISBURSEMENTS					
Relay Services		\$	30,791.54	\$	276,506.52
TAP		Ψ	6,279.26	Ψ	111,605.63
Lifeline			98,461.44		980,574.00
High Cost Support			3,397,753.00		27,319,352.00
Audit Fees			-		207,939.53
Certified Mail Fees					-
Program Administration			17,233.92		137,871.36
Bank Fees			201.36		1,482.92
Total Disbursements		\$	3,550,720.52	\$	29,035,331.96
				-	, ,
MISCELLANEOUS INC (EXP)				
Administrator Penalty		\$	1,582.90	\$	1,582.90
Total Miscellaneous		\$	1,582.90	\$	1,582.90
Operating Surplus / (Deficit)		\$	106,231.18	\$	1,722,908.88
	Fund Balances for I				
	Beginning Fund Balance	\$	2,684,882.27		
	Operating Surplus (Deficit)		106,231.18	-	
	Ending Fund Balance	S	2,791,113.45	-	

Prepared by GVNW Consulting, Inc.

LEC/Electing Carrier Revenues As Reported and Projected

		-			As Re	and a first second second	A CONTRACTOR	- Anna						iected			
	Activity Month	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17			Dec-17	Jan-18	Feb-18	Mur-18		
mpany	Data Month	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Total	Average	Nov-17	Dec-17	Jan-18	Feb-18	TOTAL	M
estem Telephone Co				C. Carrow													L
Valley Telecomm																	L
oint Communication																	L
	tions Services, Inc.																L
	Council Grove Study Area																A
-Kan Telephone C																	L
ngham Telephone	Company Inc																1
rt Telephone Com																	L
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wer Telephone C																	L
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go Telecommunic																	1
State Telephone Telephone Com																	LA
Telephone Comp																	ĩ
RLECs		\$ 2000 242	\$ 2112697	\$ 2086 651	\$ 2072022	\$ 2066 284	\$ 2022 221	\$ 2 001 402	\$ 2022 822	\$ 16 10/ 627	\$ 2.061.929	\$ 1990 100	\$ 1.990,100	\$ 1 990 100	\$ 1990 100	\$ 21.155.028	
	Average Methodology	5 2.077.545	5 2.112.007	5 2.000.001	5 2,012,925	3 2,000,384	5 2.052,524	\$ 2,001,495	\$ 2,022,022	5 10.474.027	5 2.001.020	S (71.728)					
	s monthly average)											5 (11.120)	3 (/1./20)	3 (11.120)	(/1./28)	\$ (200.912	,
ny projection less	s monthly average)																
western Bell Telep									-	-				-	-		L
	Average Methodology											1-					
	s monthly average)																
ryLink						-										1	L
	verage Methodology					-						0					

Total - All LECs/Electing Carriers

<u>\$ 101,721,637 \$ 12,715,204</u> \$ 10,099,063 \$ 10,099,063 \$ 10,099,063 \$ 10,099,063 Grand Total \$ 150,078,291

Wireless Providers' Revenues As Reported and Projected

	all shall be				As Re	ported		FY 03/16 - 02/17					Proj	octud			
	Activity Month	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17		1	Dec-17	Jan-18	Feb-18	Mar-18	· · · .	
any		Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Total	Average	Nov-17	Dec-17	Jan-18	Feb-18	TOTAL	
	LLC (Ceased) LP (Sprint PCS)									and the second second						Torino	
ellular	Telephone Company																
15 Lim	nited Partnership																
elecom,																	
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Americ																	S
	s (VAW) LLC																
	cations LLC Vircless PCS LLC d/t																
liar w	VIRCIESS PCS LLC 0/6																
С	2																
bile U	ISA L.P.																
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Difference - Lower or Average Methodology (Monthly projection less monthly Average)

S (1.616.404) S (1.613.109) S (1.623.166) S (1.623.166) S (6.475.846)

Voice over Internet Protocol (VoIP) Providers' Revenues As Reported and Projected

100 C 10

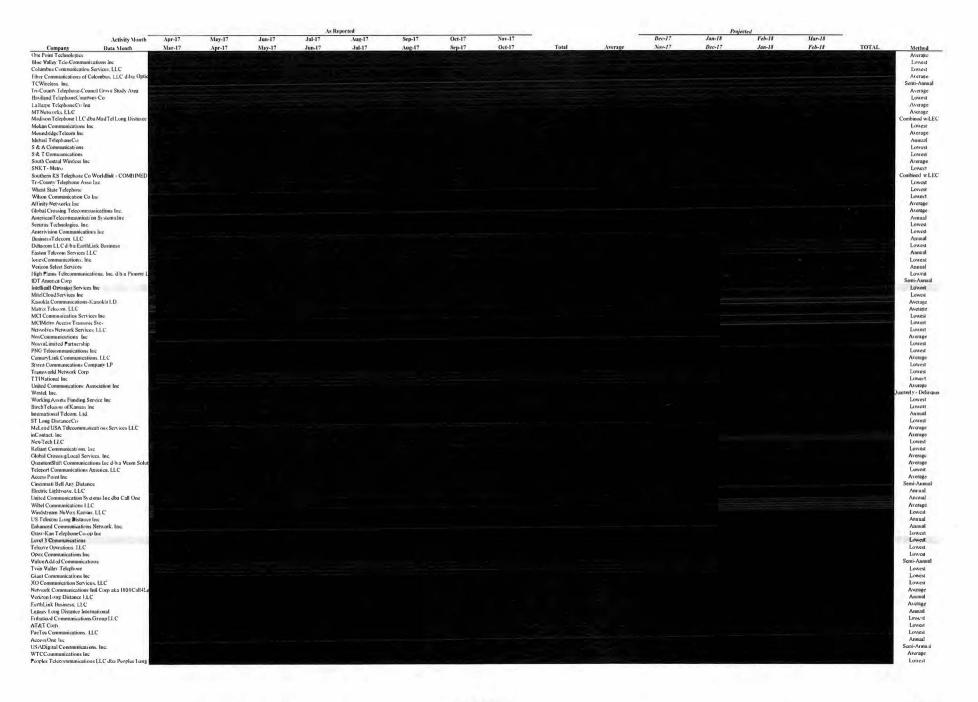
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	ions US Corporation															
a Talk LLC mage Business So	elutions Inc.															
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osmaz Technologi																
erface Security S	vstems LLC															
MA, Inc.	10-1-1 I															
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ing, Inc.																
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Solo Technologi beam, LLC	ies of Florida One. Inc.															
ght House Netwo	orks. LLC															
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xtiva Inc.																
utpoint Inc. st IP Communic	ntion: In:															
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uba America In	formation Systems. Inc															
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paBay DSI. Inc	d/b/a PBX-Change															
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alPhone Corp.																
wik Services S mlly Networks.																
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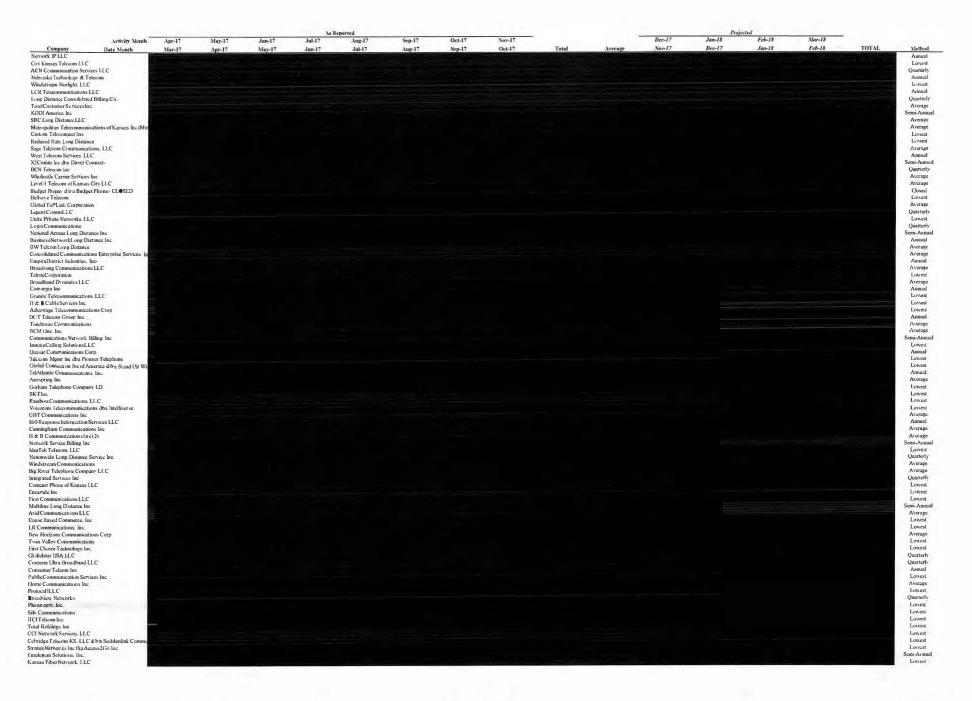
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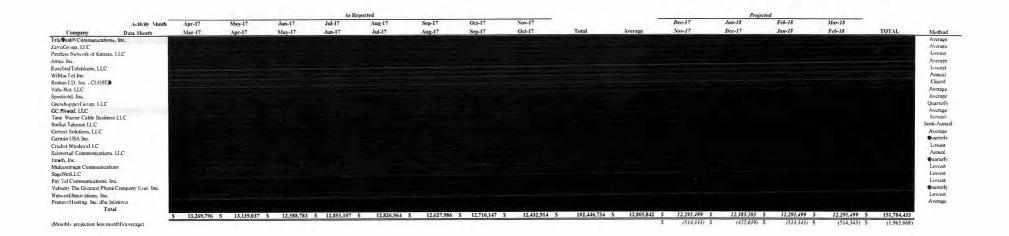
in a tria	1 million				ported	-					Constant of the second		iected		-
Activity		May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	-		Dec-17	Jan-18	Feb-18	Mar-18	TOTIC
ompany Data M isan Intirastructure, Inc	lonth Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Total	Average	Nov-17	Dec-17	Jan-18	Feb-18	TOTAL
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ad Conununication Solutions db	a Key														
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NNow, Inc.	100														
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nillaSoft Corp.															
oda Communications. Inc.															
SSComm. Inc.															
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umerce Services. Inc. d/b/a Gyr															
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ele Digits Inc															
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ity VOIP. LLC															
erra Networks. Inc.	-														
Total	\$ 1 707 06	7 5 1 600 613	£ 1 (19 111	5 1 (0(22)	8 1517571	\$ 1/71/61	6 1 736 310	e 10101	£ 12 11/ 100	6 1 /27 8/8	1 1 (12 01)	\$ 1 (22 207	\$ 1.587,841	\$ 1 597 941	\$ 10 566 101
			3 1,018,111	3 1,000,231	\$ 1,512,574	5 1.0/4.051									
crence - Lower or Average Met								*	0 10,140,100	0 110011000	\$ (10.854)				\$ (191,479

2 2

Difference - Lower or Average Methodology (Monthly projection less monthly average)







IXCs/Others

Totals

	1	Projected Yr. 21		Year 20		Annual C		2 Year		
RLECs	\$	2017/2018 24,455,028	\$	2016/2017 24,514,331	\$	Revenue (59,303)	Percent -0.24%	Average -1.73%		
SWBT	*	24,433,028	\$	24,314,331	¢	(39,303)	-0.24%	-1./5%	*	
CenturyLink	*								*	
Wireless		296,404,930		350,578,672		(54,173,742)	-15.45%	-13.74%		
VoIP		19,566,101		19,465,816		100,285	0.52%	2.99%		
IXCs/Others		151,704,433		166,958,615		(15,254,182)	-10.06%	-9.90%		
Total	\$	617,753,756	\$	698,838,370	\$	(81,084,614)	-11.60%	-11.18%		
		Yr. 20		Year 19		Annual C	Change	2 Year		
		2016/2017		2015/2016		Revenue	Percent	Average		
RLECs	\$	24,514,331	\$	25,331,170	\$	(816,839)	-3.22%	-2.44%		
SWBT	*								*	
CenturyLink	*	250 579 (72)		200 475 470		(47, 800, 800)	12.020/		*	
Wireless VoIP		350,578,672		398,475,479		(47,896,808)	-12.02% 5.47%	-13.76% 4.53%		
IXCs/Others		19,465,816		18,455,657		1,010,159	-9.74%			
Total	\$	166,958,615 698,838,370	\$	184,983,736 783,111,827	\$	(18,025,121) (84,273,457)	-10.76%	-4.55%		
Total	ψ	070,030,370	ψ	/05,111,027	ψ	(04,275,457)	-10.7070	-10.1470		
		Year 19		Year 18		Annual C	Change			
		2015/2016		2014/2015		Revenue	Percent			
RLECs	\$	25,331,170	\$	25,757,879	\$	(426,709)	-1.66%			
SWBT	*								*	
CenturyLink	*								*	
Wireless		398,475,479		471,569,694		(73,094,215)	-15.50%			
VoIP		18,455,657		17,815,240		640,417	3.59%			
IXCs/Others		184,983,736	-	183,782,934	-	1,200,802	0.65%			
Total	\$	783,111,827	\$	865,427,680	\$	(82,315,853)	-9.51%			
				Recognized		Projected				
		Projected Yr]	Proj. Growth/		Revenue	Plus:	Projected Yr.	Impact of "lower or	Total Increase /
		21 Revenues		Decline %		Change	Rebalancing	22 Revenue	Average)	Reduction
RLECs	\$	24,455,028		-0.25%	\$	(61,138)		\$ 24,393,890	(286,913)	\$ (348,050)
SWBT	*			-8.50%		~ * /				*
CenturyLink	*			-8.50%						3
Wireless		296,404,930		-14.50%		(42,978,715)	-	253,426,216	(6,475,846)	(49,454,561)
VoIP		19,566,101		1.50%		293,492	-	19,859,593	(191,479)	102,012
**** G / G /									(4.0.4.4.4.4.0)	

-9.50%

-10.98%

\$

151,704,433

617,753,756

\$

(16,377,589)

78,973,417

(1,965,668)

(11,137,157) \$

*

REDACTED INFORMATION

(14,411,921)

(67,836,259)

\$

-

137,292,512

\$

\$ 549,917,497

Comparison: Projected Year 20 Revenue Growth/Decline To Reported Revenue Base

Category	Reven	ojected Year 20 nue for Assessment hru 2/2016 (1) (A)		ported Year 20 ssable Revenues (B)		Difference (C = B - A)
ILECs Wireless Interconnected VoIP	\$	172,289,485 359,832,214 18,943,320	\$	161,835,267 350,578,672 19,465,816	\$	(10,454,218) (9,253,542) 522,497
IXCs/Others Total	e	178,864,896	¢	166,958,615	e	(11,906,281)
Total	2	729,929,914	2	698,838,370	\$	(31,091,544)
Average Monthly Revenues	\$	60,827,493	\$	58,236,531	\$	(2,590,962)
Net KUSF Obligation	\$	47,631,932	\$	47,631,932	\$	47,631,932
Calculated Assessment Rate	_	6.53%	_	6.82%	_	0.29%

Comparison: Impact of Revenue Adjustment Factor on Year 21 Revenues and Assessment Rate

Category		ojected Year 21 Revenue Base (A)		jected Year 22 evenue Base (B)	$\frac{\text{Difference}}{(C = B - A)}$		
LECs/Electing Carriers Wireless	\$	150,078,291 296,404,930	\$	139,339,176 253,426,216	\$	(10,739,115) (42,978,714)	
Interconnected VoIP IXCs/Others	-	19,566,101 151,704,433	_	19,859,593 137,292,512		293,492 (14,411,921)	
Total	\$	617,753,756	\$	549,917,497	\$	(67,836,259)	
Average Monthly Revenues	\$	51,479,480	\$	45,826,458	\$	(5,653,022)	
Estimated KUSF Obligation	\$	41,222,375	\$	41,222,375	\$	41,222,375	
Calculated Assessment Rate		6.67%	-	7.50%		0.82%	

Category	Reported Revenue thru 10/2017 (A)	Rev	urrent Year 21 venue Projected thru 2/2017 (B)	Yea	ginal Projected r 21 Assessable Revenues (2) (C)		Difference D = (C - B)
ILECs	\$ 101,721,637	\$	150,078,291	\$	152,221,270	\$	2,142,979
Wireless	201,913,650		296,404,930		306,920,637		10,515,707
VoIP	13,146,108		19,566,101		20,017,331		451,230
IXCs/Others	 102,446,734		151,704,433		160,489,933		8,785,500
Total (2)	\$ 419,228,129	\$	617,753,756	\$	639,649,171	\$	21,895,415
Average Monthly Revenues	\$ 52,403,516	\$	51,479,480	\$	53,304,098	\$	1,824,618
Net KUSF Obligation	\$ 46,373,157	\$	46,373,157	\$	46,373,157	\$	46,373,157
Calculated Assessment Rate		1.1	7.51%		7.25%		-0.26%
						-	

Notes:

(2) KUSF Year 21 projected revenue (March 2017 - Feb. 2018), December 15, 2016 Direct Testimony of Sandra K. Reams,

Exhibit SKR-1, p. 2; Attachment L, Docket No. 17-GIMT-008-GIT.

VERIFICATION

18-GIMT-084-GIT

STATE OF KANSAS)) ss. COUNTY OF SHAWNEE)

Sandra Reams, being duly sworn upon her oath deposes and states that she is the Assistant Chief of Telecommunications for the Utilities Division of the State Corporation Commission of the State of Kansas; that she has read and is familiar with the foregoing Direct Testimony of Sandra Reams on Behalf of Kansas Corporation Commission Staff (Public Version), and that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Reams

Sandra Reams Assistant Chief of Telecommunications Kansas Corporation Commission of the State of Kansas

SUBSCRIBED AND SWORN to before me this 20th day of December, 2017.

VICKI D. JACOBSEN Notary Public - State of Kansas My Appt. Expires

Vicia D. Jacobsen Notary Public

My Appointment Expires: June 30, 2018

CERTIFICATE OF SERVICE

18-GIMT-084-GIT

I, the undersigned, certify that a true and correct copy of the above Direct Testimony of Sandra Reams on Behalf of the Kansas Corporation Staff (Public Version) was served via electronic service this 20th day of December, 2017, to the following:

COLLEEN R. JAMISON JAMES M. CAPLINGER, CHARTERED 823 SW 10TH AVE TOPEKA, KS 66612-1618 Fax: 785-232-0724 colleen@caplinger.net

OTTO NEWTON, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604 Fax: 785-271-3167 o.newton@kcc.ks.gov ***Hand Delivered***

AUSTIN, TX 78701-1647 Fax: 913-345-6756

kevin.k.zarling@centurylink.com

BRUCE A. NEY, EXEC. DIR.-SENIOR LEGAL COUNSEL NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T MOBILITY 816 CONGRESS AVE SUITE 1100 AUSTIN, TX 78701-2471 Fax: 512-870-3420 bn7429@att.com KEVIN K. ZARLING UNITED TELEPHONE CO. OF KANSAS D/B/A CENTURYLINK 400 W 15TH ST STE 315 AHSAN LATIF, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 Fax: 785-271-3354 a.latif@kcc.ks.gov

MARK E. CAPLINGER MARK E. CAPLINGER, P.A. 7936 SW INDIAN WOODS PL TOPEKA, KS 66615-1421 mark@caplingerlaw.net

DIANE C. BROWNING, ATTORNEY SPRINT SPECTRUM L.P. KSOPHN0314-3A459 6450 SPRINT PKWY OVERLAND PARK, KS 66251-2400 Fax: 913-523-0571 diane.c.browning@sprint.com

/s/ Vicki Jacobsen

Vicki Jacobsen