

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

Before Commissioners:                    Andrew J. French, Chairperson  
    Dwight D. Keen  
    Annie Kuether

In the Matter of the Assurance Wireless USA,    )  
L.P.        to        Expand        its        Eligible    )        Docket No. 25-VMBZ-235-ETC  
Telecommunications    Carrier    Designated    )  
Service Area and to Receive Lifeline Support    )  
for Eligible Services.                                    )

**ORDER GRANTING EXPANSION OF ETC DESIGNATION**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (“Commission”) for consideration and determination. Having examined its files and records, the Commission finds and concludes:

1.        On December 6, 2024, Assurance Wireless USA, L.P. (Assurance Wireless or Company) filed an application with the Commission requesting to expand its designation as an Eligible Telecommunications Carrier (ETC) in 134 wire centers in the state of Kansas. Assurance Wireless seeks to expand its federal Lifeline-Only service area and seeks to apply for Kansas Universal Service Fund’s (KUSF) Kansas Lifeline Service Program (KLSP) subsidies in the areas it currently serves and will be designated as an ETC.<sup>1</sup>

2.        In order to receive an ETC designation, the applicant carrier must make showings required under federal law. Pursuant to 47 U.S.C. § 214(e)(1)-(2), § 254(c), and 47 C.F.R. § 54.101(a), the carrier must make the following showings:

- a.        The carrier will offer the services supported by federal universal service support mechanisms under 47 U.S.C. § 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including

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<sup>1</sup> Assurance Wireless Application, ¶ 2-3, Dec. 6, 2024 (Application).

the services offered by another ETC) throughout the service area for which designation is received.<sup>2</sup>

- b. The carrier will advertise the availability of such services and the charges using media of general distribution.<sup>3</sup>
  - c. Designation will be consistent with the public interest, convenience, and necessity.<sup>4</sup>
3. In order to make a public interest showing for both federal and state ETC

designation, the Commission requires the potential ETC to show:

- a. The carrier is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.<sup>5</sup>

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<sup>2</sup>The supported services are codified in 47 C.F.R. § 54.101(a), which reads as follows:

(a) Voice telephony services and broadband service shall be supported by federal universal service support mechanisms.

(1) Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

(2) Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.

Carriers who receive forbearance from the "own-facilities" requirement for federally supported universal service still need to meet the "own facilities" requirement in order to be eligible for Kansas Universal Service Fund ("KUSF") support. K.S.A. 66-2008(b)(1); Order Dismissing Application, ¶¶ 39-42, Docket No. 17-TFWZ-237-ETC (May 11, 2017). In determining whether "minutes of use for local service is provided at no additional charge to end users," the Commission will consider the comparability of a competitive Eligible Telecommunications Carrier's ("ETC's") offering to the incumbent local exchange carrier's offering. *See* Docket No. 06-GIMT-446-GIT, Order Addressing Comments Regarding Revisions to Eligible Telecommunications Carrier Certification Forms, October 2, 2007. The Commission will evaluate the total service package, "including the local calling scope, included features, and usage that might otherwise be considered long distance." *Id.* The Commission will also consider whether an ETC applicant offers unlimited calling to government, social service, health facilities, educational institutions and emergency numbers when considering comparability. *Id.*

<sup>3</sup>47 U.S.C. § 214(e)(1)(B).

<sup>4</sup>The Commission will weigh certain factors to determine whether it is in the public interest to grant another carrier ETC status. Those factors include a) benefits of increased competitive choice; b) the impact of multiple ETC designations on the KUSF; c) the unique advantages and disadvantages of the carrier's service offering; d) commitments made regarding quality of telephone service provided by competing providers; and e) the carrier's ability to provide the supported services throughout the designated service area within a reasonable time frame. *See* Docket No. 04-RCCT-338-ETC, Order No. 14 Order Granting ETC Designation and Addressing Additional Issues, September 30, 2004. The Commission will also take into account any other relevant factors in determining whether ETC designation is in the public interest.

<sup>5</sup>*See* 47 § C.F.R. 54.201(h), 54.202(a)(4); Docket No. 10-GIMT-658-GIT, Order Requiring Lifeline-Only ETC Applicants to Provide Kansas-Specific Information and Requesting Comments on AT&T Refund Issue, June 21, 2012. The FCC has stated that relevant considerations for such a showing include: a) Whether the Applicant previously offered services to non-Lifeline consumers; b) How long the Company has been in business; c) Whether the Applicant intends to rely exclusively on USF disbursements to operate; d) Whether the Applicant receives or will receive revenue

- b. The carrier has received approval of its Compliance Plan with the FCC (if applicable).
- c. The carrier undertakes efforts to eliminate waste, fraud, and abuse in the Lifeline program.
- d. The carrier has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes.<sup>6</sup>
- e. The carrier will provide service throughout its designated service area to all customers making a reasonable request for service.
- f. The carrier will comply with all applicable federal and state laws, rules, regulations, and orders. The carrier will inform the Commission of any changes in service made to comply with updated laws, rules, regulations, and orders.

4. Commission Staff (“Staff”) filed a Report and Recommendation regarding the Application on June 17, 2025, attached hereto and made a part hereof by reference.<sup>7</sup> Staff examined Assurance Wireless’s Application and made detailed findings in the Report and Recommendation.

5. Staff determined that Assurance Wireless demonstrated its ability to provide the service or functionalities supported by the universal service support system and that its local usage component was comparable to that of the incumbent carrier.<sup>8</sup>

6. Staff indicated that Assurance Wireless meets the advertising requirements and recommends the Commission require the Company to file a revised advertisement in this docket.<sup>9</sup> Staff stated that the public interest will be served its ETC expansion in the requested service areas

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from other sources; and e) Whether the Company has been subject to enforcement action or an ETC revocation proceeding in any state. In Docket No. 10-GIMT-658-GIT, the Commission also stated that lifeline-only ETC applicants should provide Kansas-specific information regarding technical and financial capacity similar to the information provided in the carrier’s FCC Compliance Plan.

<sup>6</sup>See Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designations of Eligible Telecommunications Carrier, October 2, 2006.

<sup>7</sup> Staff’s Report and Recommendation, Jun. 17, 2025. (Staff’s R&R).

<sup>8</sup> Staff’s R&R, p. 7.

<sup>9</sup> Staff’s R&R, p. 10.

for the purpose of participating in the federal and state Lifeline program.<sup>10</sup> Staff stated that Assurance Wireless meets the FCC's rules pursuant to 47 C.F.R. § 54.201 and 54.202 as being financially and technically capable to offer Lifeline-only support in its requested service areas.<sup>11</sup>

7. Based on Assurance Wireless's representations in its application and responses to discovery requests, Staff recommended approval of the Company's application for expansion of its ETC designation into the areas outlined in Exhibit 1 attached to Staff's Report and Recommendation. Staff also indicated the public interest is served by allowing Assurance Wireless to serve as a Lifeline-only ETC in the expansion area.

8. Based on Staff's R&R, Assurance Wireless must use federal and state Lifeline funds received for their intended purpose, and Assurance Wireless shall pass the entire Lifeline credit through to the consumer. Furthermore, the company is also required to abide by Lifeline-only ETC requirements adopted by this Commission, including annual ETC recertification requirements, and Assurance Wireless must comply with such requirements to continue to receive state and federal support.

9. Based on Staff's R&R, Assurance Wireless is required to file in this docket a revised advertisement including the Public Affairs and Consumer Protection contact information.

10. The Commission adopts Staff's R&R as additional findings concludes the recommendations found therein to be just and reasonable and therefore the Company's Application should be granted.

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. Assurance Wireless USA, L.P.'s ETC Application in this matter is approved. The Company is granted expanded ETC status as a Lifeline-Only ETC for FUSF support in the areas

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<sup>10</sup> Staff's R&R, p. 12.

<sup>11</sup> Staff's R&R, p. 13.

identified in Exhibit 1 to Staff's Report & Recommendation. The Company is granted ETC status as a Lifeline-Only ETC for KUSF support and participation in the KLSP in all applicable areas it serves.

B. Assurance Wireless shall:

- i. use any federal and state Lifeline funds received only for their intended purpose as set forth by law, and Assurance Wireless shall give the entire Lifeline credit to their consumers,
- ii. abide by Lifeline-only ETC requirements adopted by this Commission, including annual ETC recertification requirements, and Assurance Wireless USA, L.P.,
- iii. comply with such requirements to continue to receive state and federal support, and
- iv. file in this docket within thirty (30) days of this order a revised advertisement including the Public Affairs and Consumer Protection contact information in the instant docket.

C. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).<sup>12</sup>

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 07/08/2025



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Celeste Chaney-Tucker  
Executive Director

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<sup>12</sup>K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

Laura Kelly, Governor

## **REPORT AND RECOMMENDATION UTILITIES DIVISION**

**TO:** Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

**FROM:** Jorge Soto-Gomez, Telecommunications Analyst  
Steve Garrett, Deputy Chief of Telecommunications  
Janet Buchanan, Deputy Director of Utilities  
Justin Grady, Director of Utilities

**DATE:** June 17, 2025

**SUBJECT:** Docket No. 25-VMBZ-235-ETC

In the Matter of Application of the Assurance Wireless USA, L.P. to Expand its Eligible Telecommunications Carrier Designated Service Area and to Receive Lifeline Support for Eligible Services.

### **EXECUTIVE SUMMARY:**

On December 6, 2024, Assurance Wireless USA, L.P. (Assurance Wireless or Company) filed an application with the Kansas Corporation Commission (Commission) to expand its designation as an Eligible Telecommunications Carrier (ETC) in 134 wire centers in the state of Kansas. Assurance Wireless seeks to expand the federal Lifeline-Only service area to include the wire centers listed in Exhibit 1. Additionally, Assurance Wireless seeks to apply for Kansas Universal Service Fund's (KUSF's) Kansas Lifeline Service Program (KLSP) subsidies in the areas it currently serves and will be designated as an ETC.<sup>1</sup>

Staff conducted a review of the Company's Application and issued several data requests to gather information necessary for evaluation of Assurance Wireless's request. Staff recommends that the Commission approve Assurance Wireless's Lifeline-Only ETC Expansion Application to include the areas identified in Revised Exhibit 1 attached to this Report and Recommendation (R&R). Staff also recommends that the company be required to file an updated copy of advertisement including the Public Affairs and Consumer Protection contact information in the instant docket.

### **BACKGROUND:**

On December 6, 2024, Assurance Wireless filed an Application with the Commission to expand its designation as an ETC in 134 wire centers in Kansas. Assurance Wireless seeks to expand the

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<sup>1</sup> See Application, ¶¶ 18-20, pp. 7-8.

federal Lifeline-Only service area to include the wire centers listed in Exhibit 1. The company also requests approval to receive KUSF Lifeline support in those areas. Assurance Wireless is a Delaware Foreign Limited Partnership with its principal place of business located at 12920 SE 38<sup>th</sup> Street Bellevue, WA 98006. Assurance Wireless is in an “Active and Good Standing” status with the Kansas Secretary of State Office.<sup>2</sup> Assurance Wireless states it has been designated as an ETC in 47 states and Washington D.C.<sup>3</sup> Assurance Wireless is a wholly owned subsidiary of T-Mobile USA, Inc. (T-Mobile). T-Mobile acquired Assurance Wireless in 2020 as part of its purchase of Sprint Corporation.

The Commission has previously designated Assurance Wireless as an ETC in certain areas of Kansas. On November 2, 2011, in Docket No. 10-VMZ-657-ETC (10-657 Docket), the Commission issued an order granting Assurance Wireless, formerly Virgin Mobile USA, L.P.,<sup>4</sup> designation as an ETC in its requested service areas for the purpose of receiving federal Lifeline support when utilizing its own facilities but not for those lines served through resale arrangements. The 10-657 Docket required redefinition of eleven service areas to the exchange level. The Commission granted conditional approval of Assurance Wireless’ Motion for Waiver<sup>5</sup> of the Commission’s Lifeline Calling Plan Rule<sup>6</sup>, for limiting the Lifeline customers to three calling plans and the company was required to file quarterly reports for the first year following the Commission’s Order containing the number of complaints and inquiries it received from Lifeline customers and requesting the ability to subscribe to one of the non-Lifeline calling plans in Kansas. The requested study area definitions that were approved by the Commission were approved by operation of law by the FCC.<sup>7</sup>

Lifeline service is among the services supported through the Federal Universal Service Fund (FUSF) and the KUSF, which were established through the Federal and Kansas Telecommunication Acts respectively. The Lifeline program assists low-income consumers<sup>8</sup> by providing a discount on their monthly local telephone or internet charges so that telephone service is more affordable.

To be eligible to receive support from the FUSF and KUSF, a carrier is required to be designated an ETC. A state commission may designate a carrier as an ETC in accordance with 47 U.S.C. § 214(e)(1), which requires:

A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in

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<sup>2</sup> Kansas Secretary of State, Assurance Wireless USA, L.P., <https://www.sos.ks.gov/eforms/BusinessEntity/Search.aspx>, Last viewed April 30, 2025.

<sup>3</sup> See Application, ¶ 5, pp. 2-3.

<sup>4</sup> See *Order Approving Name Change*, Docket No. 20-VMZ-411-CCN, April 21, 2020.

<sup>5</sup> Requested on February 11, 2011. Granted on November 2, 2011.

<sup>6</sup> See Docket No. 06-GIMT-446-GIT, *Order Adopting Requirements for Designations of Eligible Telecommunications Carrier*, October 2, 2006, ¶ 77e; Docket No. 06-GIMT-446-GIT, *Order Addressing Petitions for Reconsideration*, November 20, 2006, ¶ 58.

<sup>7</sup> See Notification to KCC regarding service area redefinition from FCC, Docket No. 10-VMZ-657-ETC, *Virgin Mobile USA, L.P.’s Correspondence Regarding Expansion of Lifeline ETC Offerings to All Areas Approved by the Commission Order*, May 4, 2012.

<sup>8</sup> As defined in 47 C.F.R. § 54.409.

accordance with section 254 of this title and shall, throughout the service area for which the designation is received:

- (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using media of general distribution.

The Commission derives its authority to designate ETCs pursuant to 47 U.S.C. § 214(e)(2), which requires:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

Additionally, Kansas law (K.S.A. 66-2008(b)), adopts the federal standards contained in 47 U.S.C. § 214(e)(1). Specifically, K.S.A. 66-2008(b) states:

Pursuant to the federal act, distributions from the KUSF shall be made in a competitively neutral manner to qualified telecommunications public utilities, telecommunications carriers and wireless telecommunications providers, that are deemed eligible both under subsection (e)(1) of section 214 of the federal act and by the commission.

The Federal Communications Commission (FCC) has set forth the services which are to be supported by the FUSF in rural, insular and high-cost areas. These services are found in 47 C.F.R. §54.101, which states:

(a) Services designated for support. Voice Telephony services and broadband services shall be supported by federal universal service support mechanisms.

(1) Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charges to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.



(2) Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.<sup>9</sup>

Finally, an ETC is also subject to the requirements of the following FCC rules set out in 47 C.F.R. §§ 54.201, 54.202, 54.203, 54.205, 54.207, 54.408, and 54.410.<sup>10</sup>

- 54.201 - Definition of eligible telecommunications carriers, generally.
- 54.202 - Additional requirements for Commission designation of eligible telecommunications carriers.
- 54.203 - Designation of eligible telecommunications carriers for unserved areas.
- 54.205 - Relinquishment of universal service.
- 54.207 - Service Areas.
- 54.408 - Minimum service standards.
- 54.410 - Subscriber eligibility determination and certification.

### **ANALYSIS:**

In reviewing Assurance Wireless' request for expanded ETC designation, Staff issued Discovery Request No. 1 (DR 1) containing five questions on April 1, 2025. Company responses were received on April 11, 2025. Within DR 1, Staff asked the company to fix discrepancies found in Exhibit 1 and Exhibit 3 of the Application, and to correct telephone company names and corresponding wire center codes used in the exhibits. Staff also requested an update on the advertisements used by the company, conformity with the Cellular Telecommunications Industry Association's (CTIA's) quality of service standards, its commitment to minimum service standards established by the FCC for Lifeline providers, and its commitment to remain functional in an emergency. On April 16, 2025, Excel versions of Revised Exhibit 1 and Revised Exhibit 3 were provided to Staff through e-mail.

### **Additional Company Information**

On April 16, 2012, in Docket No. 12-VM-BZ-025-KSF, the Commission's Order assessed Virgin Mobile USA, L.P. (now Assurance Wireless) a monetary penalty of \$500.00 for the company's non-compliance with the Commission's established standard for reporting revenues to the KUSF. The KUSF Administrator's Fiscal Year 14<sup>11</sup> Audit Report filed on March 23, 2012, indicated that the company did not request authorization from the KCC to use a company-specific traffic study to determine its intrastate revenue to the KUSF nor had it filed its factors with the Commission. The Commission received payment of the penalty on May 15, 2012, and closed the docket on May 23, 2012.

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<sup>9</sup> 47 C.F.R. § 54.101.

<sup>10</sup> 47 C.F.R. Part 54 – Universal Service Subparts C and E.

<sup>11</sup> KUSF Year 14 consists of March 2010- February 2011.

On June 1, 2017, in Docket No. 17-VMBZ-023-KSF, the third-party KUSF administrator's Fiscal Year 19<sup>12</sup> Audit Report, showed that from January 2012 through February 2017, Virgin Mobile USA, L.P. (now Assurance Wireless) failed to report all Lifeline subscriber-related revenues, resulting in an estimated \$227,000 due to the KUSF. On July 11, 2017, the Commission directed Virgin Mobile USA, L.P. to include all Lifeline-related revenue, including revenue that would be collected directly from the end-user, absent the customer's Lifeline eligibility (including the \$9.25 federal Lifeline reimbursement), to the KUSF. The company was also directed to submit True-Ups to correct the KUSF audit deficiency and pay the additional assessments owed within sixty (60) days from the date of the Order. On July 21, 2017, the company filed its Petition for Reconsideration of the Order in the same docket. The company had chosen not to report the revenue to the KUSF because it reasoned that the federal Lifeline support was exempt from the KUSF. On August 15, 2017, the Commission issued an Order which denied the company's Petition for Reconsideration as the company failed to show that the Commission's adoption of the Audit Report was unlawful or unreasonable. The Commission required the company to repay money it failed to report to the KUSF, rather than penalizing for non-compliance.

### **Federal and State ETC Requirements**

The statutes of the Federal Act mentioned earlier herein, 47 U.S.C. § 214(e)(1) and 47 U.S.C. § 214(e)(2), provide information on how a carrier can be designated as an ETC. Congress empowered the states to designate a common carrier as an ETC. The Commission must evaluate Assurance Wireless' ability to meet the criteria set out in 47 U.S.C. § Section 214(e)(2). Assurance Wireless requests ETC designation in several rural service areas, therefore, the Commission is required to make a public interest determination with regard to the service areas and Staff will provide a public interest recommendation.

In order to be designated as an ETC, a company must be a "common carrier" as defined in 47 U.S.C. § 153(11):

The term "common carrier" or "carrier" means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this chapter; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier.

Assurance Wireless provides Commercial Mobile Radio Service (CMRS) and therefore qualifies as a common carrier service. Assurance Wireless continues to meet the federal definition of common carrier. A company must be an ETC to qualify for Lifeline support. Assurance Wireless currently provides services as an ETC.

### **Service or Functionalities**

The FCC identifies the services or functionalities that shall be supported by the federal universal service support mechanisms, pursuant to 47 U.S.C. § 254 (c). The supported services are codified in 47 C.F.R. § 54.101(a):

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<sup>12</sup> KUSF Year 19 consists of March 2015 -February 2016.

Voice Telephony services shall be supported by federal universal service support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

With regard to the local usage component, the Commission determined in its October 2, 2006, Order in Docket No. 06-GIMT-446-GIT (October 2<sup>nd</sup> Order) that it would follow the FCC's guidance and evaluate local usage by considering the comparability of a competitive ETC's offering on a case-by-case basis "by evaluating the total service package, including the local calling scope, included features, and usage that might otherwise be considered long distance." The Commission further stated that it would consider whether an ETC applicant offers unlimited calling to government, social service, health facilities, educational institutions and emergency numbers when considering comparability.<sup>13</sup>

In paragraph 11 of the Application, Assurance Wireless states they "will provide all services required by Section 54.101(a) of the FCC's Rules throughout its expanded designated service area in the State of Kansas, including voice and broadband Internet access services." The company also attached Exhibit 4 to its Application which details its Lifeline service offering.

In DR 1, Question 4, Staff asked the company whether it would "affirm [its] continued commitment to current voice telephony service standards?" The company responded as follows:

Assurance Wireless confirms its commitment to satisfy or exceed the minimum service standards for Lifeline providers established by the FCC, including the voice telephony service standards.

A Lifeline ETC must offer voice, broadband, or a package of voice and broadband services to low-income consumers. In order for service providers to receive reimbursement, Lifeline supported services must meet the FCC's Minimum Service Standards for voice and broadband speed and usage allowances, including annual updates to those standards and any future changes to the applicable rules. The standard is updated on an annual basis and published in a Public Notice issued by the Wireline Competition Bureau on or before July 31, which gives the new minimum standard for the upcoming year. Effective December 1, 2024, the federal Lifeline Program Minimum Service Standards for mobile voice telephony service is: 1,000 minutes of usage per month; mobile broadband data capacity of 4.5 GB per month at a speed of 3G or greater, until at least December 1, 2025; fixed broadband service at 1,230 GB per month of data at a speed of 25/3 Mbps or greater.<sup>14</sup>

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<sup>13</sup> See *Order Adopting Requirements for Designation of Eligible Telecommunications Carriers*, Docket No. 06-GIMT-446-GIT, October 2, 2006, ¶¶ 7-8, pp. 4-5.

<sup>14</sup> See *Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount*, Public Notice, FCC WC Docket No. 11-42, July 30, 2024; *Minimum Service Standards*, USAC, <https://www.usac.org/lifeline/rules-and-requirements/minimum-service-standards/>, Lasted viewed May 5, 2025.

On February 11, 2011, within the 10-657 Docket, Assurance Wireless filed a Motion for Waiver of the Commission's Lifeline Calling Plan Rule. The Commission's Lifeline Calling Plan Rule directs ETCs to apply the Lifeline discount to the service plan a qualifying Lifeline customer selects. The Lifeline Calling Plan Rule ensures customers are provided with choice and that low-income support is not directed towards inferior service. Assurance Wireless requested approval for limiting Lifeline customers to three service plans. In that proceeding, Staff analyzed both the three Lifeline and traditional non-Lifeline service plans Assurance Wireless offered and concurred with the company that the three Lifeline service plans offer greater value than the traditional plans. Staff acknowledged that the administrative cost of applying the Lifeline discount to every calling plan may outweigh the benefit to the customer of having more options. It is in the public interest that Lifeline customers are not limited to one plan or restricted to only the lowest cost plan an ETC has available.

Assurance Wireless offers the following Lifeline plans:

1. Basic Lifeline: unlimited text messaging, 3,000 domestic voice minutes and 4.5 gigabytes of data provided at no charge to the subscriber.
2. Data Peace of Mind Annual: unlimited texts, 3,000 domestic voice minutes, and 7 gigabytes of data for \$10/annually.
3. Data Peace of Mind Monthly: unlimited texts, 3,000 domestic voice minutes, and 7 gigabytes of high-speed data per month for \$0.83/month.<sup>15</sup>

The administrator of the Lifeline program, the Universal Service Administrative Company (USAC), indicates that the federal Lifeline support amount for bundled voice and broadband is currently \$9.25. The bundled voice and broadband service that meets the minimum voice service standards only is \$5.25.<sup>16</sup> Currently, Lifeline support offered through the KUSF is \$7.77 for voice service.

Eligible customers would be able to apply the federal Lifeline credit to the Assurance Wireless broadband and voice Lifeline calling plans of their choosing. The KUSF Lifeline program supports voice services only. Assurance Wireless' broadband offerings would not be eligible for KUSF Lifeline support. Assurance Wireless' website includes helpful information on the Lifeline plans<sup>17</sup>, the qualifications for the program, instructions on how to apply, and other useful information.

Staff determines Assurance Wireless' three service plans meets the Minimum Service Standards. Assurance Wireless will offer facilities-based wireless telecommunications service. Staff is satisfied that Assurance Wireless has continued to demonstrate an ability to provide the service or functionalities supported by the universal service support systems and that its local usage component is comparable to that of the incumbent carrier.

### **Service Areas**

Section 214(e)(5) of the Federal Act defines "service area" as:

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<sup>15</sup> See Application, Exhibit 4.

<sup>16</sup> See *Id.*

<sup>17</sup> Lifeline Plans, <https://www.assurancewireless.com/plans>. Last viewed May 5, 2025.

The term “service area” means a geographic area established by a State commission for the purpose of determining universal service obligations and support mechanisms. In the case of an area served by a rural telephone company, “service area” means such company’s “study area” unless and until the [Federal Communications] Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company.

“Service areas” or “operating areas” are defined by the state act in K.S.A. 66-1,187(k). K.S.A. 66-1,187(k) provides that,

- (1) In the case of a rural telephone company, operating area or service area means such company’s study area or areas as approved by the federal communications commission;
- (2) In the case of a local exchange carrier, other than a rural telephone company, operating area or service area means such carrier’s local exchange service area or areas as approved by the commission.

Specifically for Lifeline, K.S.A. 66-2006(c) states:

To generate and facilitate participation in the lifeline service program, provide choice for Kansas consumers, and allow collection of federal lifeline program reimbursements, **the KCC shall approve a wireline (non-CMRS) facilities-based telephone service provider's application** for eligible telecommunications carrier, hereinafter referred to as the ETC, designation in a non-rural service area for the purpose of receiving low-income federal universal service fund support for participation in the lifeline service program, **for the area equal to the applicant provider's own service area**, provided the applicant provider meets all other ETC eligibility requirements. The commission, however, may condition that such designation remains consistent with the guidelines of the federal program. (Emphasis added).

On April 15, 2013, the FCC released an Order<sup>18</sup> granting forbearance from the requirements of Section 47 U.S.C. § 214(e)(5) of the Act and 47 C.F.R. § 54.207(b) that the service area of an ETC conform to the service area of any rural telephone company serving the same area. The forbearance Order is limited to a carrier’s designation as a Lifeline-Only ETC and applies to any ETC that has been designated as Lifeline-Only or any existing ETC seeking a limited designation to participate in the Lifeline-Only program.

Forbearance in these limited circumstances merely removes the requirement to conform to the service area of any rural telephone company serving the same area for previously designated ETCs receiving Lifeline-Only support and carriers with pending or future ETC designation requests for Lifeline-Only support. The Commission may now designate Lifeline-Only ETCs in a “portion” of a rural service area without redefinition of that rural service area. However, the Commission is

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<sup>18</sup> See *Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform, Virgin Mobile USA, L.P., et al Petitions for Forbearance*, FCC 13-44 Order, April 15, 2013.

still required to consider the public interest, convenience and necessity of designating carriers as a competitive ETC in a rural area already served by a rural telephone company.<sup>19</sup>

Assurance Wireless seeks expansion of its ETC designation for Lifeline support in areas designated within Exhibit 1. Staff issued DR 1, Question 1 to Assurance Wireless to confirm the proposed expansion areas and request revisions to Exhibit 1. The company revised Exhibit 1 to correctly identify the wire center Common Language Location Identification codes (CLLI Codes) and their corresponding exchanges. Assurance Wireless' revisions also addressed Staff concerns by removing wire centers granted in prior dockets. Revised Exhibit 1 contains the corrections. Staff reviewed Revised Exhibit 1 and with Assurance Wireless' conformity, found it is a true representation of Assurance Wireless's requested expansion in this Application. The list of service areas is attached to this R&R as Revised Exhibit 1.

Assurance Wireless' Application includes an expansion of its ETC designation into both rural and non-rural areas. Areas served by Rural Local Exchange Carriers (RLECs), whose service areas are defined by the Federal Act as rural, are listed within Revised Exhibit 1. The Revised Exhibit 1 also includes expansion into the areas where Brightspeed Companies of Kansas (Brightspeed)<sup>20</sup> is the Incumbent Local Exchange Carrier (ILEC). Lastly, the Revised Exhibit 1 also includes expansion into areas served by AT&T Kansas, a non-rural telephone company in Kansas.

The Republican City exchange is a Nebraska and Kansas cross-border exchange. The designation of those cross-border exchanges is limited to the area that they cover within the state of Kansas. For anything that extends outside of the boundaries of the state of Kansas, the Commission would lack jurisdiction to designate an ETC in that area.

Staff is satisfied with the provided service area detail listed in Revised Exhibit 1. Therefore, Staff recommends that the Commission authorize Assurance Wireless to expand its ETC designation as a Lifeline-Only ETC within all the areas requested.

### **Advertising**

Eligibility for FUSF support is addressed by Section 214(e) of the Federal Act and, pursuant to § 214(e)(1)(B), an ETC must:

Advertise the availability of such services and the charges therefore using media of general distribution.

In addition to the FCC's advertising requirements, this Commission has established a requirement for competitive ETCs to develop "...meaningful language so that consumers will understand what

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<sup>19</sup> 47. U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(c).

<sup>20</sup> Collectively known as both "Brightspeed Companies of Kansas" and trade name "Brightspeed" in the state of Kansas, it is currently comprised of separate legal entities, 4 ILECS and 1 CLEC, respectively: Brightspeed of Kansas, LLC; Brightspeed of Eastern Kansas, LLC; Brightspeed of Southern Kansas, Inc.; Brightspeed of West Missouri, LLC; and Brightspeed Broadband, LLC. After a series of name changes in 2023-2024, "Brightspeed" was formerly and collectively known as "United Telephone Companies of Kansas d/b/a CenturyLink" in the state of Kansas.

they can expect from an ETC”<sup>21</sup> The Commission determined that all ETCs shall include contact information for the Commission’s Office of Public Affairs and Consumer Protection (PACP) in its advertisements to make sure that customers know where to turn with questions and complaints.<sup>22</sup>

Staff’s review of the Application provided by Assurance Wireless found that it did not include information on advertisements. Staff submitted DR 1, Question 2 requesting Assurance Wireless provide a sample of the advertisements used and to include the PACP contact information. Assurance Wireless’s response to DR 1, Question 2 indicates that the company will make the suggested corrections. Accordingly, Staff provided suggested language to Assurance Wireless, which it has agreed to use, in its advertising for the Kansas ETC areas. The language is as follows:

For unresolved questions or complaints, you may contact the state commission in your state:

**Customers may contact the Kansas Corporation Commission, Office of Public Affairs and Consumer Protection with any concerns, at address 1500 SW Arrowhead Road, Topeka, KS 66604, through email: [kcc.public.affairs@ks.gov](mailto:kcc.public.affairs@ks.gov) or call toll-free 1-(800)-662-0027 or in Topeka (785)-271-3140. Hearing or speech impaired TTY Kansas Relay Center 1-(800)-766-3777.**

On November 20, 2006, in Docket No. 06-GIMT-446-GIT the Commission granted reconsideration on the issue of advertising requirements as follows:

The advertising requirements are to be applied only to print advertising that is designed to reach those customers in a CETC’s designated service area. If a CETC chooses not to advertise through print in its designated area, the advertising requirements must be met through another form of advertising.

Assurance Wireless advertises its voice and broadband services through a combination of media channels, which may include social media, videos, apps, email, website, direct marketing etc. An example of the marketing used is, “Get free data, talk & text on the T-Mobile Network with Assurance Wireless Lifeline Services. See if you qualify today.”<sup>23</sup> “Assurance Wireless will include the PACP’s contact information on this webpage: <https://www.assurancewireless.com/lifeline-services/states/kansas-lifeline-freegovernment-phone-service>. The website information will appear under the second “Apply Now” button near the bottom of the page.”<sup>24</sup>

Staff is satisfied that Assurance Wireless will continue to meet the advertising requirement and requests that Assurance Wireless file a revised advertisement in the instant docket.

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<sup>21</sup> See *Order Adopting Requirements of Designation of Eligible Telecommunications Carriers*, Docket No. 06-GIMT-446-GIT, dated October 2, 2006,

<sup>22</sup> *Id.*, paragraph 13.

<sup>23</sup> See DR 1 Response, Marketing Examples pdf 2025.

<sup>24</sup> See DR 1, Question 2 Response, April 11, 2025.

### Public Interest Evaluation

The FCC, in its *Virginia Cellular Order*, made findings regarding determination of the public interest.<sup>25</sup> In this Order, the FCC determined that the “value of increased competition, by itself, is not sufficient to satisfy the public interest test in rural areas.”<sup>26</sup> The FCC indicated it would consider the following in evaluating the public interest:

- the benefits of increased competition;
- the impact of multiple designations on the universal service fund;
- the unique advantages and disadvantages of the applicant’s service offering;
- any commitments made regarding quality of service; and
- the applicant’s ability to provide the supported services throughout the designated service area within a reasonable amount of time.<sup>27</sup>

While the FCC’s decision is not binding on this Commission, the Commission found in its ALLTEL<sup>28</sup> and RCC Minnesota<sup>29</sup> Orders that examination of the additional factors enumerated in the FCC’s Order is reasonable.

Because Assurance Wireless requests ETC designation in rural areas, the public interest must be considered by the Commission. In its Application, Assurance Wireless, in addition to noting that the Commission had previously designated the company as an ETC, provided the following explanations of how the ETC expansion meets the public interest requirement for federal and state Lifeline support:

[E]xpansion of Assurance Wireless's ETC service area to include all additional areas where it has wireless coverage will serve the public interest by providing a variety of benefits to more Lifeline-eligible consumers including increased consumer choice, high-quality service offerings, and mobility. The designated ETC area expansion will increase the number of low-income households that can benefit from Assurance Wireless's high quality mobile voice, text, and data services.<sup>30</sup>

As noted above, Assurance Wireless is also applying to receive KUSF subsidies for its **provision of Lifeline-supported services to its customers in the areas in which is has, and will be, declared to be an ETC**. Under K.S.A. 66-2009(b), wireless carriers that have been declared by the Commission to be ETCs are eligible for Lifeline benefits from the KUSF.<sup>31</sup> (Emphasis added).

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<sup>25</sup> See *In the Matter of Federal State Joint Board on Universal Service: Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Released: January 22, 2004 (“*Virginia Cellular Order*”), FCC Docket No. DA 03-338.

<sup>26</sup> See *Id.*, ¶ 4.

<sup>27</sup> See *Id.*

<sup>28</sup> See *Order Granting ETC Designation and Addressing Additional Issues*, Docket No. 04-ALKT-283-ETC, dated Sept. 24, 2004, ¶ 28.

<sup>29</sup> See *Order No. 14: Granting ETC Designation and Addressing Additional Issues.*, Docket No. 04-RCCT-338-ETC, dated Sept. 9, 2004, ¶ 26.

<sup>30</sup> See Application, ¶ 17, p. 7.

<sup>31</sup> See *Id.* ¶ 18, pp. 7-8.



**Assurance Wireless commits to continue the provision of all services required for participation in the Kansas Lifeline Service Program.**<sup>32</sup> (Emphasis added).

All low-income customers in the Assurance Wireless ETC service area will benefit from the presence of an additional KLSP-participating carrier, even if they personally do not subscribe to Assurance Wireless service.<sup>33</sup>

Additional Lifeline providers enhance and expand universal service generally, by expanding consumer choice as access to the public switched network is available to more consumers. This result in turn enhances the value of the network for all customers by increasing the number of individuals able to call and be called. Additionally, designation of another Lifeline ETC for state support will advance a specific public interest confirmed by the Kansas Legislature in K.S.A. 66-2006(a):

The purpose of the KLSP shall be to promote the provision of universal service by local exchange carriers to persons with low income. The KLSP shall be targeted to maintain affordable rates for residential local exchange service.

Assurance Wireless states, it is still a signatory to Cellular Telecommunications Industry Association's (CTIA) Consumer Code for Wireless Service ("CTIA Code").<sup>34</sup> The company is among those carriers who have voluntarily adopted the principles, disclosures, and practices of wireless service provided to individual consumers. Assurance Wireless since its inception and as part of T-Mobile, has complied with the CTIA Code.

Staff finds that Assurance Wireless' commitments in its previous ETC Docket, the 10-657 Docket is also represented in the expansion request in this Application. Designation of Assurance Wireless as a state and federal ETC will cause Lifeline credits to be paid by the universal service funds only for the number of qualifying consumers who elect the Assurance Lifeline service. After reviewing Assurance Wireless' Application and its responses to Staff DR 1, Staff contends that Assurance Wireless has demonstrated that it is in the public interest to designate its ETC expansion in the requested service areas for the purpose of participating in the federal and state Lifeline-Only programs.

### **Consumer Eligibility and Enrollment**

In the FCC's *Lifeline Reform Order*, the FCC comprehensively reformed and began the modernization of the federal Lifeline program.<sup>35</sup> Pursuant to the Order and 47 C.F.R. 54.410(d), ETCs in all states were required to update their Lifeline Certification forms by June 1, 2012, to include specific information in clear, easily understood language and participants are required to make initial and annual certifications. The information required to be disclosed includes that Lifeline is a federal benefit and that Lifeline can only be received for one line per household.

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<sup>32</sup> See Id. ¶ 19, p. 8.

<sup>33</sup> See Id. ¶ 20, p. 8.

<sup>34</sup> See DR 1, Question 3 Response, April 11, 2025.

<sup>35</sup> See *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*; WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23; Report and Order and Further Notice of Proposed Rulemaking; Rel. Feb. 6, 2012, ("*Lifeline Reform Order*").

The National Verifier is Lifeline's centralized application system which determines whether consumers are eligible for Lifeline. USAC manages the National Verifier and provides customer service to consumers through the Lifeline Support Center. The National Verifier was launched in Kansas on October 23, 2019. Customers wishing to enroll in Assurance Wireless' Lifeline service can apply either online or via U.S. Mail to the National Verifier. Assurance Wireless' website contains ample information on the Lifeline government assistance program, indicating the service is non-transferable, that only eligible low-income consumers may enroll in the program, and that the program is limited to one discount per household.

To guard against fraud, waste, and abuse of the Lifeline program, Assurance Wireless uses the National Verifier and National Lifeline Accountability Database (NLAD). This ensures compliance with FCC rules designed to reach that objective. The company states in its Application at paragraphs 12-16, that it will comply with the FCC requirements of: Lifeline eligibility; certification & re-certification; recordkeeping; annual reporting; and de-enrollment.

### **Technically and Financially Capable**

The FCC at 47 C.F.R. §§ 54.201 and 54.202 of its rules, which govern ETC designation, requires a carrier seeking designation as a Lifeline-Only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules. Specifically, 47 C.F.R. § 54.202(a)(4) requires an ETC to "...demonstrate that it is financially and technically capable of providing the Lifeline service . . ." and 47 C.F.R. § 54.201(h) provides:

A state commission shall not designate a common carrier as an eligible telecommunications carrier for purposes of receiving support only under subpart E (Lifeline) of this part unless the carrier seeking such designation has demonstrated that it is financially and technically capable of providing the supported Lifeline service in compliance with subpart E of this part.

In its *Lifeline Reform Order*, the FCC stated that among the relevant considerations for such a showing are:

- a) Whether the Applicant previously offered services to non-Lifeline consumers.
- b) How long the Company has been in business.
- c) Whether the Applicant intends to rely exclusively on USF disbursements to operate.
- d) Whether the Applicant receives or will receive revenue from other sources.
- e) Whether the Company has been subject to enforcement action or an ETC revocation proceeding in any state.

The Commission requested comments in its March 27, 2012, Order in Docket No. 10-GIMT-658-GIT on what additional information should be provided by Lifeline-only ETCs to demonstrate their technical and financial capacity in Kansas. After reviewing the Comments filed, the Commission determined in its June 21, 2012, Order that:

Lifeline-only ETC applicants are hereby required to file Kansas-specific information regarding technical and financial capacity similar to the information

provided in the carrier's FCC Compliance Plan when filing for Lifeline-only ETC status in Kansas.<sup>36</sup>

Assurance Wireless has been an ETC in Kansas since 2011 when it received Commission approval as Lifeline-Only ETC in the 10-657-Docket. Although there have been concerns with KUSF Lifeline reporting in the past<sup>37</sup>, Assurance Wireless (formerly Virgin Mobile) is now a new entity with a new name under the umbrella of T-Mobile who is currently the second largest wireless carrier in the United States. Assurance Wireless does business nationwide for telecommunications customers. Assurance Wireless is currently in good standing with this Commission. The company has not been subject to ETC revocation in any state. Staff is satisfied that Assurance Wireless continues to meet the FCC's rules pursuant to 47 C.F.R. § 54.201 and 54.202 as being financially and technically capable to offer Lifeline-Only support in its requested service areas.

### **Ability to Remain Functional in an Emergency**

The Commission determined in its October 2, 2006 Order in Docket No. 06-GIMT-446-GIT that, as part of its public interest evaluation, the Commission will require an ETC Applicant to demonstrate that it has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes.<sup>38</sup>

Assurance Wireless was asked about its commitment to functionality in emergency situations in DR 1, Question 5. The company response was:

Assurance Wireless confirms its commitment to remain functional in emergency situations. As the FCC has recognized, Assurance Wireless has the beneficial use of its affiliate, T-Mobile's, network. T-Mobile has a robust set of internal programs, policies, teams, and facilities in place to ensure functionality in emergency situations. Its network is monitored 24 hours a day, seven days a week, 365 days a year by network monitoring centers.

Detailed information about the ability of T-Mobile (including Assurance Wireless) to remain functional in emergency situations is provided in the attached T-Mobile's Business Continuity Program Summary. Additional information about T-Mobile's ability to remain functional in emergency situations is available at <https://www.t-mobile.com/responsibility/community/emergency>.

The T-Mobile Enterprise Business Continuity Program implements recovery solutions that minimize the impact on customers and services during potential business disruptions. There are enterprise-wide teams to address business continuity, disaster recovery, network availability, emergency response, and customer support. T-Mobile's network infrastructure and equipment have resilience and the capability to deploy in case of emergency disasters such as natural, cell site, switch and power failures. T-Mobile has IP backbone technology that can reroute traffic for

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<sup>36</sup> See *Order Requiring Eligible Telecommunications Carriers to Comply with New Lifeline Requirements and Requesting Comments*, Docket No. 10-GIMT-658-GIT, June 21, 2012, ordering paragraph A.

<sup>37</sup> As summarized in the "Additional Company Information" section of this R&R.

<sup>38</sup> As noted by the FCC in 47 C.F.R. 54.202(a)(2) requiring an ETC to demonstrate it has the ability to remain functional in an emergency.

customers to go without disruption and avoid congestion during normal operations. The IP backbone network routers have redundant processors, power supplies (such as batteries and diesel generators) at all sites.<sup>39</sup>

Accordingly, Assurance Wireless has experience anticipating and managing emergency situations and assuring continuation of service. Staff is satisfied that Assurance Wireless will continue to properly respond to emergency situations and remain functional during emergencies.

### **Benefit Transfers**

The USAC database defines a benefit transfer as when one service provider transfers a subscriber's Lifeline program benefit from another service provider. The benefit transfer must be at the request of the subscriber. The subscriber's new service provider initiates the transaction in the NLAD on the subscriber's behalf. Prior to initiating a benefit transfer in NLAD, the service provider must obtain the consent of the subscriber and obtain proper documentation of consent.<sup>40</sup>

Staff reminds Assurance Wireless to follow the guidelines set in place by USAC when transferring the subscriber's service to Assurance Wireless.

### **RECOMMENDATION:**

Staff recommends the Commission grant Assurance Wireless' request to expand its designation as an ETC for federal Lifeline-Only support and state Lifeline-Only support in all of the requested wire centers listed in the company's Revised Exhibit 1.

Additionally, Assurance Wireless should be reminded that federal and state Lifeline funds must be used for their intended purpose, and the company shall pass the entire Lifeline credit through to the consumer. Assurance Wireless should be aware that it is required to abide by Lifeline-Only ETC requirements adopted by this Commission, including annual ETC recertification requirements and Assurance Wireless will be required to follow these to continue to receive state and federal support.

Staff recommends the Commission issue an Order:

1. Granting Assurance Wireless' request for expansion as a Lifeline-Only ETC for FUSF support in the areas identified in Revised Exhibit 1;
2. Granting Assurance Wireless' request for application as a Lifeline-Only ETC for KUSF support and participation in the KLSP in all the areas it currently has, and will be, designated an ETC in the instant docket; and
3. Requiring Assurance Wireless to file a revised advertisement including the PACP contact information in the instant docket.

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<sup>39</sup> Assurance Wireless's Business Continuity Program pdf, April 11, 2025.

<sup>40</sup> <https://www.usac.org/lifeline/national-lifeline-accountability-database-nlad/benefit-transfers/>.

**REVISED EXHIBIT 1**  
LIST OF WIRE CENTERS  
REQUESTED FOR  
EXPANDED ETC DESIGNATION

<b>Company Name</b>	<b>Locality</b>	<b>Wire center</b>
BRIGHTSPEED OF EASTERN KANSAS, LLC	ALTOONA	ALNAKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	BENEDICT	BNDCKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	COYVILLE	CYVLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	DURHAM	DRHMKSPA
BRIGHTSPEED OF EASTERN KANSAS, LLC	EFFINGHAM	EFHMKSPA
BRIGHTSPEED OF EASTERN KANSAS, LLC	FALL RIVER	FLRVKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	GREELEY	GRELKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	GRIDLEY	GRDLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LAFONTAINE	LFNTKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LEHIGH	LHGHKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LEROY	LERYSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	PARKER	PRKRKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	QUINCY	QNCYKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	TORONTO	TOROKSPA
BRIGHTSPEED OF KANSAS, LLC	BURLINGTON	BURLKSXA
BRIGHTSPEED OF KANSAS, LLC	ELLINWOOD	ELLNKSXA
BRIGHTSPEED OF KANSAS, LLC	FREDONIA	FRDNKSXA
BRIGHTSPEED OF KANSAS, LLC	GARNETT	GRNTKSXA
BRIGHTSPEED OF KANSAS, LLC	HIAWATHA	HWTHKSXA
BRIGHTSPEED OF KANSAS, LLC	HIGHLAND	HGLDKSPA
BRIGHTSPEED OF KANSAS, LLC	HILLSBORO	HLBOKSPA
BRIGHTSPEED OF KANSAS, LLC	HORTON	HRTNKSXA
BRIGHTSPEED OF KANSAS, LLC	POWHATTAN	PWHTKSXA
BRIGHTSPEED OF KANSAS, LLC	WESTPHALIA	WPHLKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	ABBYVLPLVN	ABVLKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	ALDEN	ALDNKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	BELPRE	BLPRKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	CLAFLIN	CLFLKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	HOISINGTON	HSTNKSXB
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	HUDSON	HDSNKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	LANGDON	LNGDKSPA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	PARTRIDGE	PRRGKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	STERLING	STNGKSXA
BRIGHTSPEED OF SOUTHERN KANSAS, INC.	SYLVIA	SYLVKSXA
CITIZENS TELECOM OF NE LLC DBA FRONTIER COM OF NE	SRPUBLCNCY	RPCYNEXG
CONSOLIDATED COMMUNICATIONS OF KANSAS COMPANY, LLC	JETMORE	JTMRKSXA
CONSOLIDATED COMMUNICATIONS OF KANSAS COMPANY, LLC	LEOTI	LEOTKSXA
CONSOLIDATED COMMUNICATIONS OF KANSAS COMPANY, LLC	SHARON SPG	SHSPKSXA
CONSOLIDATED COMMUNICATIONS OF KANSAS COMPANY, LLC	TRIBUNE	TRBNKSXA
ELKHART TEL. CO., INC.	ELKHART	EKHTKSXA
GOLDEN BELT TEL. ASSN., INC.	ALBERT	ALBRKSXA
GOLDEN BELT TEL. ASSN., INC.	GARFIELD	GRFDKSXA
GOLDEN BELT TEL. ASSN., INC.	MACKSVILLE	MCVLKSXA

GOLDEN BELT TEL. ASSN., INC.	ROZEL	ROZLKSXA
GOLDEN BELT TEL. ASSN., INC.	RUSH CENTER	RSCTKSXA
GOLDEN BELT TEL. ASSN., INC.	ST JOHN	STJHKSXA
GORHAM TEL. CO., INC.	GORHAM	GRHMKSSXA
H & B COMMUNICATIONS, INC.	BUSHTON	BSTNKSXA
H & B COMMUNICATIONS, INC.	DORRANCE	DRNCKSXA
H & B COMMUNICATIONS, INC.	HOLYROOD	HLRYKSXA
J.B.N. TELEPHONE COMPANY, INC.	WETMORE	WTMRKSXA
MUTUAL TEL. CO.	LITTLE RIVER	LTRVKSXA
PIONEER TEL. ASSN., INC.	ULYSSES	ULYSKSXA
RURAL TEL. SERVICE CO., INC. DBA NEX-TECH	GALATIA	GALAKSXA
RURAL TEL. SERVICE CO., INC. DBA NEX-TECH	OLMITZ	OLMTKSXA
RURAL TEL. SERVICE CO., INC. DBA NEX-TECH	VICTORIA	VCTAKSXA
S & T TEL. COOP. ASSN.	BREWSTER	BRWSKSXA
S & T TEL. COOP. ASSN.	DIGHTON	DGTNKSXA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ALMENA	ALMEKSMA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ANTHONY	ANTHKSWS
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BELOIT	BELTS02
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BIRD CITY	BRCYKSRE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BUCKLIN	BCKLKSSM
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CANEY	CANYKS05
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CEDAR VALE	CDVAKSPL
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CHASE	CHASKSWE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CHERRYVALE	CHVAKSEM
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CLAYCENTER	CLCTKS06
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	COFFEYVL	CFVLKSDE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	COLBY	CLBYKS05
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	COLDWATER	CDWRKSLU
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	DODGE CITY	DDCYKS01
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ELLSWORTH	ELWOKSNO
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	FLORENCE	FLRNKSTR
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	FOWLER	FWLRKSMI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	FRANKFORT	FRFTKSLO
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GARDENCITY	GRCYKS07
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GOODLAND	GDLDKSAB
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GREAT BEND	GRTBKSST
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HAMILTON	HMTNKS01
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HANOVRRHNBG	HNVRKSED
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HARPER	HRPRKSMA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HAYS	HAYSKS11
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HERINGTON	HNTNKSNA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HERNDON	ATWDKSST
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HOLCOMB	HLCMKSMA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HOWARD	HWRDKSWA

[illegible]

HOXIE	HOXIKSTR
INDEPNNDNCE	INDPKSMA
JEWELL	JEWLKSHA
LA CROSSE	LACRKSEL
LARNED	LRNDKSBR
LIBERAL	LBRLKS04
LINCOLN	LNCLKSLI
LYONS	LYNSKSEA
MANKATO	MNKTKSCO
MARION	MARNKSLA
MARYSVILLE	MYVIKSEL
MCDONALD	MCDDKSKE
MEADE	MEADKSSL
MEDICINE LODGE	MDLDKS01
MINNEOLA	MNNLKSTU
MOLINE	MOLNKSMI
NEODESHA	NDSHKS04
NORCATUR	NRTNKSLI
OAKLEY	OKLYKS03
OBERLIN	OBRLKSHA
PAWNEEROCK	PWRRKSYU
PEABODY	PBDYKSWA
PHILLIPSBG	PHBGKS04
PLAINS	PLNSKSLO
PLAINVILLE	PLVLKSMI
PROTECTION	PRTCKSMA
SABETHA	SBTHKSVI
SCOTT CITY	SCCYKSMA
SEDAN	SEDNKSCH
SENECA	SENCKSDE
SEVERY	SVRYKSRE
SMITH CTR	SMCTKSMA
SOCOFFEYVL	CFVLKS10
ST FRANCIS	STFNKSWA
STAFFORD	STFRKSBO
STOCKTON	SKTNKSAS
SUBLETTE	SBLTKSOR
WASHINGTON	WASHKS03
WATERVILLE	WTVLKSST
YATES CTR	YTCTKSST
TOPEKA	TPKAKSJA
LIBERTY	LBRTKSXA
TYRO	TYROKSXA
COUNCILGRV	CNGVKXSX



TRI-COUNTY TEL. ASSN., INC.  
WHEAT STATE TEL., INC.  
WHEAT STATE TEL., INC.

LINCOLNVL  
CASSODAY  
UDALL

LNVLKSXA  
CSSDKS04  
UDLLKS03

**REVISED EXHIBIT 3**  
**WIRE CENTERS SERVED**

<b>COMPANY NAME</b>	<b>LOCALITY</b>	<b>CLLI</b>
BLUE VALLEY TELE-COMMUNICATIONS, INC.	HOME	HOMEKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	ALTA VISTA	ALT VKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	BELLEPLAIN	BLLPKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	BLUE MOUND	BLM NKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	BUCYRUS	BCYRKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	BUFFALO	BFLOKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	CENTROPOLS	CNTRKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	CIRCLEVL	CRVLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	CONWAY	CNWKXSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	DELIA	DELIK SXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	DENISON	DESNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	EASTON	ESTNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	EDGERTON	EGTNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	EMMETT	EMMTKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	FONTANA	FNTAKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	GARDNER	GRNRKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	HARVEYVL	HVVLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	HESSTON	HETNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	HOYT	HOYTKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	INMAN	INM NKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LANCASTER	LNCSKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LANE	LANEKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LEBO	LEBOKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	LINWOOD	LNWDKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	MAPLETON	MPTNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	MAYETTA	MYTTKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	MCLOUTH	MCLTKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	MERIDEN	MRDNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	MICHIGNVLY	MCVYKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	MOUND CITY	MDCYKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	NEOSHO FLS	NSFLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	NORTONVL	NRVLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	OSAGE CITY	OSCYKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	OVERBROOK	OVBKKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	OXFORD	OXFRKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	OZAWKIE	OZW KKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	PERRY	PRRYKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	PIQUA	PIQUKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	PRINCETON	PRTNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	RICHMOND	RCMDKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	ROSSVILLE	ROVLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	SILVERLAKE	SLLKKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	SPRINGHILL	SPHLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	ST MARYS	STMYKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	THAYER	THYRKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	WALTON	WLTNKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	WELLSVILLE	WLVLKSXA
BRIGHTSPEED OF EASTERN KANSAS, LLC	WINCHESTER	WNCHK SXA

BRIGHTSPEED OF EASTERN KANSAS, LLC  
BRIGHTSPEED OF KANSAS, LLC  
BRIGHTSPEED OF KANSAS, LLC  
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BRIGHTSPEED OF KANSAS, LLC  
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BRIGHTSPEED OF KANSAS, LLC  
BRIGHTSPEED OF KANSAS, LLC  
BRIGHTSPEED OF SOUTHERN KANSAS, INC  
BRIGHTSPEED OF SOUTHERN KANSAS, INC  
BRIGHTSPEED OF SOUTHERN KANSAS, INC  
BRIGHTSPEED OF SOUTHERN KANSAS, INC  
BRIGHTSPEED OF SOUTHERN KANSAS, INC  
BRIGHTSPEED OF WEST MISSOURI, LLC  
BRIGHTSPEED OF WEST MISSOURI, LLC  
BRIGHTSPEED OF WEST MISSOURI, LLC  
BRIGHTSPEED OF WEST MISSOURI, LLC  
CONSOLIDATED COMMUNICATIONS OF KANSAS, LLC  
CRAW - KAN TELEPHONE COOPERATIVE, INC.  
CRAW - KAN TELEPHONE COOPERATIVE, INC.  
CRAW - KAN TELEPHONE COOPERATIVE, INC.  
CRAW - KAN TELEPHONE COOPERATIVE, INC.  
CRAW - KAN TELEPHONE COOPERATIVE, INC.  
CRAW - KAN TELEPHONE COOPERATIVE, INC.  
CUNNINGHAM COMMUNICATIONS, INC. - KS  
GOLDEN BELT TELEPHONE ASSOCIATION, INC.  
HAVILAND TELEPHONE CO., INC.  
HAVILAND TELEPHONE CO., INC.  
HOME TELEPHONE CO., INC.

WINDOM	WNDMKSXA
ALMA	ALMAKSXA
ALTAMONT	ALMTKSXA
BALDWIN	BLDWKSXA
BUHLER	BHLRKSXA
BURLINGAME	BRLNKSXA
BURRTON	BRRTKSXA
ESKRIDGE	ESRGKSXA
FT RILEY	JNCYKSXB
HAVEN	HVENKSXA
HOLTON	HLTNKSXA
JUNCTIONCY	JNCYKSXA
KINCAID	KNCDKSXA
LYNDON	LYNDKSXA
MELVERN	MLVRKSXA
MORAN	MORNKSXA
MORRILL	MORLKSXA
MOUND VLY	MNVYKSXA
OSAWATOMIE	OSWTKSXA
OSKALOOSA	OSKLKSXA
OSWEGO	OSWGKSXA
POMONA	POMNKSXA
QUENEMO	QUNMKSXA
TROY	TROYKSXA
VALLEY FLS	VLFLKSXA
WATHENA	WTHNKSXA
WAVERLY	WVRLKSXA
WHITECLOUD	WHCLKSXA
ARLINGTON	ARTNKSXA
CUNNINGHAM	CNHMKSXA
MURDOCK	MRDCKSXA
PRESTON	PSTNKSXA
PRETTYPRRI	PRPRKSXA
BAXTER SPG	BXSPKSXA
GALENA	GALNKSXA
RIVERTON	RVTNKSXA
SCAMMON	SCMNKSXA
AMERICUS	AMRCKSXA
ARMA	ARMAKSXA
COLONY	CLNYKSXA
GALESBURG	GLBGKSXA
GIRARD	GRRDKSXA
PLEASANTON	PLTNKSXA
UNIONTOWN	UNTWKSXA
GLEN ELDER	GLELKSXA
LEWIS	LEWSKSXA
CONWAY SPG	CNSPKSXA
HAVILAND	HVLDKSXA
ASSARIA	ASSRKSXA

HOME TELEPHONE CO., INC.	GALVA	GALVKSXA
J.B.N. TELEPHONE CO., INC.	AGENDA	AGNDKSXA
J.B.N. TELEPHONE CO., INC.	CUBA	CUBAKSXA
J.B.N. TELEPHONE CO., INC.	HAVENSVILLE	HNVLKSXA
J.B.N. TELEPHONE CO., INC.	SOLDIER	SLDRKSXA
KANOKLA TELEPHONE ASSOCIATION	CALDWELL	CLWLKSXA
LA HARPE TELEPHONE CO., INC.	LA HARPE	LHRPKSXA
MADISON TELEPHONE, LLC	MADISON	MDSNKSXA
MO - KAN DIAL, INC.	HILLSDALE	HLDLKSXA
MO - KAN DIAL, INC.	LOUISBURG	LSBGKSXA
MO - KAN DIAL, INC.	RANTOUL	RNTLKSXA
MOUNDRIDGE TELEPHONE CO.	GOESSEL	GSSLKSXA
MOUNDRIDGE TELEPHONE CO.	MOUNDRIDGE	MNRGKSXA
PEOPLES TELECOMMUNICATIONS, LLC - KS	LA CYGNE	LACYKSXA
RAINBOW COMMUNICATIONS, LLC - KS	EVEREST	EVRKSXA
S & A TELEPHONE CO., INC.	ALLEN	ALLNKSXA
S & A TELEPHONE CO., INC.	SCRANTON	SCTNKSXA
SOUTHERN KANSAS TELEPHONE COMPANY, INC.	BURDEN	BRDNKSXA
SOUTHERN KANSAS TELEPHONE COMPANY, INC.	CLEARWATER	CLWRKSXA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ABILENE	ABLNKSCD
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ANDALE	ANDLKSHI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BELLEVILLE	BLVLKSMS
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BONNER SPG	KSCYKSBS
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BONNER SPG NORTH	KSCYKSBN
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	BURNS	BRNSKSPA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CANTON	CNTNKSSM
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CHANUTE	CHNTKSSS
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CHAPMAN	CPMNKS04
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CHENEY	CHNYKSKI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CHETOPA	CHTPKSBE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	COLUMBUS	CLMBKSXB
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	COLWIHBTLY	WCHTKSCB
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	CONCORDIA	CNCRKSBR
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	COTONWDFLS	CTFLKSBR
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	DE SOTO	DESTKSLU
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	DERBY	WCHTKSDE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	DOUGLASS	DGLSKSPI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	E ATCHISON	ATSNKSSF
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	EFORTSCOTT	FTSCKS01
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	EL DORADO	ELDOKSST
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	EMPORIA	EMPRKS08
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ENTERPRISE	ENTRKSCT
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	EPITTSBURG	PSBGKSLO
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ERIE	ERIEKSCI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	EUDORA	EUDRKSKI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	EUREKA	EURKKSEL
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GARDEN PL	GRDPKSLE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GODDARD	WCHTKSGM
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GREENSBURG	GNBGKSFL

SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	GYPSUM	GYPSKSOW
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HALSTEAD	HLSTKSTE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HARTFORD	HRFRKSAA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HUMBOLDT	HMBLKSB
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	IOLA	IOLAKSSY
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KANSASCITY DREXEL	KSCYKS10
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KANSASCITY DUPONT	KSCYKSNA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KANSASCITY HEDRICK	KSCYKSJO
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KANSASCITY LENEXA	KSCYKSLE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KANSASCITY SUNSET	KSCYKSPA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KECHI	WCHTKSKE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KINGMAN	KGMNKSMA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	KINSLEY	KNSLKSNI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	LEAVEHLSNG	LWVOKSSH
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	LEAVENWTH	LWVOKSLN
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	LECOMPTON	TPKAKSLE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	LEON	LEONKSPI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	LINDSBORG	LNBGKSLI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	MARQUETTE	MRQTKSKI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	MCPHERSON	MCSNKSAS
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	MINNEAPOLS	MPLSKS02
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	MOUNT HOPE	MTHPKS04
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	MULVANE	WCHTKSML
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	N TOPEKA	TPKAKSNO
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	NEWTON	NWTNKS05
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	NICKERSON	NCSNKSXA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	OLATHE	KSCYKSOL
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	OVERLANDPK	KSCYKSCB
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	PAOLA	PAOLKSPE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	PRATT	PRTTKSNI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ROSE HILL	WCHTKSRH
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	S TOPEKA	TPKAKSCA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	SALINA	SALNKSTA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	SARKNSASCY	ARCYKSSO
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	SCANDIA	SCNDKSFE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	SEDGWICK	WCHTKSCZ
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	SHAWNEE	KSCYKSSH
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	SOLOMON	SLMNKSOL
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	ST PAUL	STPLKSHI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	STANLEY	KSCYKSST
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	TONGANOXIE	TNGNKS06
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	TOPEKA	TPKAKS37
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	TOPEKA	TPKAKSFA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	TOWANDA	TWNDKSJE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	VALLEY CTR	WCHTKSVC
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WELLINGTON	WGTNKSNF
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WHITEWATER	WCHTKSWW
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA	WCHTKSNW
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA	WCHTKSOL

SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA	WCHTKSTE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA AMHERST	WCHTKSAM
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA ANDOVER	WCHTKSAN
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA AUGUSTA	WCHTKSAG
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA BENTON	WCHTKSBE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA JACKSON	WCHTKS47
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA PARKVIEW	WCHTKSCE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WICHITA ROCKY ROAD	WCHTKSAH
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WILLIAMSBG	WLBGKSMA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	WINFIELD	WNFDKSMI
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	HUTCHINSON	HTSNKS02
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	LAWRENCE	LWRNKSVE
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	MANHATTAN	MNHTKSFA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	OTTAWA	OTWAKSMA
SOUTHWESTERN BELL TELEPHONE CO., LLC DBA AT&T KANSAS	PARSONS	PRSSKSWA
TOTAH COMMUNICATIONS, INC.	ELGIN	ELGNKSXA
TRI - COUNTY TELEPHONE ASSOCIATION, INC.	HOPE	HOPEKSXA
TWIN VALLEY TELEPHONE, INC.	BENNINGTON	BGTNKSXA
TWIN VALLEY TELEPHONE, INC.	MILTONVALE	MLVAKSXA
TWIN VALLEY TELEPHONE, INC.	RILEY	RILYKSXA
TWIN VALLEY TELEPHONE, INC.	TESCOTT	TSCTKSXA
WAMEGO TELECOMMUNICATIONS CO., INC.	PAXICO	PAXCKSXA
WAMEGO TELECOMMUNICATIONS CO., INC.	ST GEORGE	STGRKSXA
WAMEGO TELECOMMUNICATIONS CO., INC.	WAMEGO	WAMGKSXA
WHEAT STATE TELEPHONE COMPANY, INC.	ROCK	ROCKKSXA
WHEAT STATE TELEPHONE COMPANY, INC.	CASSODAY	CSSDKSXA
WHEAT STATE TELEPHONE COMPANY, INC.	MATFLDGREN	MTGRKSXA
WHEAT STATE TELEPHONE COMPANY, INC.	OLPE	OLPEKSXA
WHEAT STATE TELEPHONE COMPANY, INC.	POTWIN	PTWNKSXA
WHEAT STATE TELEPHONE COMPANY, INC.	UDALL	UDLLKSXA
WILSON TELEPHONE CO., INC.	BROOKVILLE	WLSNKSXA
ZENDA TELEPHONE CO., INC.	ZENDA	ZENDKSXA

**CERTIFICATE OF SERVICE**

25-VMBZ-235-ETC

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 07/08/2025.

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/S/ KCC Docket Room  
KCC Docket Room