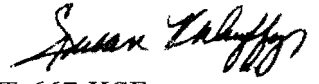


**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

JUL 13 2010

In the Matter of a Generic Proceeding to)
Address Kansas Universal Service Fund)
Support Supplemental Funding Procedures,)
as Adopted by the Commission in Docket)
No. 00-GIMT-842-GIT.)

Docket No. 10-GIMT-667-KSF



COMMENTS OF COMMISSION STAFF

COMES NOW the staff of the State Corporation Commission of the State of Kansas (Staff and Commission or KCC, respectively) respectfully submits these comments in response to the Commission's June 16, 2010 Order Opening Docket and Setting Procedural Schedule (June Order) in this proceeding:

I. BACKGROUND

1. The Kansas Telecommunications Act, K.S.A. 2009 Supp. 66-2008(d), provides, in part:

Any qualified telecommunications carrier, telecommunications public utility or wireless telecommunications service provider may request supplemental funding from the KUSF based upon a percentage increase in access lines over the 12-month period prior to the request. The supplemental funding shall be incurred for the purpose of providing services to and within the service area of the qualified telecommunications carrier, telecommunications public utility or wireless telecommunications service provider. Supplemental funding from the KUSF shall be used for infrastructure expenditures necessary to serve additional customers within the service area of such qualifying utility, provider or carrier. All affected parties shall be allowed to review and verify a request of such a qualified utility, carrier or provider for supplemental funding from the KUSF, and to intervene in any commission proceeding regarding such request. The commission shall issue an order on the request within 120 days of filing.

2. In a December 27, 1996 Order in Docket 478,¹ the Commission determined that K.S.A. 2009 Supp. 66-2008(d) (then K.S.A. 1998 Supp. 66-2008(e)) allowed new entrants to

¹In the Matter of a General Investigation Into Competition Within the Telecommunications Industry in the State of Kansas, Docket No. 94-GIMT-478-GIT (190,492-U) (Docket 478), December 27, 1996 Order, ¶ 126.

qualify for supplemental Kansas Universal Service Fund (KUSF) support and that a qualifying company could receive KUSF support, on a monthly basis, for additional lines reported to the KUSF administrator. The Commission stated that it was required to issue an order on a request for supplemental KUSF support within 120 days.

3. On February 3, 1997, the Commission issued an Order on Reconsideration in Docket 478, and clarified that: (1) KUSF support would be paid on a per line basis; (b) a company will not be required to report a loss of lines; (c) any increase in lines shall be the net of all gains and losses; and, (d) the net increase in lines shall be reported directly to the KUSF administrator.² To request supplemental KUSF support, the Commission determined a company should submit a one-page form to report a net increase in lines to the KUSF administrator, the administrator would perform a reasonableness-check and would recalculate the company's KUSF support, and disburse payment of the supplemental KUSF support, effective the following month, to the company.

4. Staff became concerned that this process was not complying with the statutory requirement for the net increase in lines to be over a 12-month period and did not allow an affected party to review or verify a request or intervene in a Commission proceeding addressing the request. Therefore, in its December 1999 testimony in Docket 236, citing to a Legislative Division of Post Audit recommendation, Staff recommended that the Commission seek comments and adopt administrative guidelines for requests for supplemental KUSF support.³ In a February 14, 2000 Order in Docket 236, the Commission agreed with Staff's concerns and directed the KUSF administrator to stop processing all requests for supplemental KUSF support,

² Docket 478, February 3, 1997 Order on Reconsideration, ¶ 66.

³ *In the Matter of an Investigation to Determine the March 1, 2000 Assessment for the New Kansas Universal Service Fund Year*, Docket No. 00-GIMT-236-GIT (Docket 236), December 22, 1999 Direct Testimony of Sandra K. Reams, pp. 10-13.

effective March 1, 2000,⁴ and stated that it would not entertain any request for supplemental KUSF support prior to March 1, 2001. The Commission directed Staff to meet with the Citizens' Utility Ratepayer Board (CURB) and telecommunications industry representatives to develop administrative guidelines and procedures for requests for supplemental KUSF support, and to file a report, with recommendations, in a new docket no later than May 1, 2000.

5. On March 13, 2000, Docket 842 was opened to address procedures for making requests for supplemental KUSF support.⁵ Staff's April 28, 2000 Report and Recommendations (April 2000 Report) contained the following proposed supplemental KUSF support procedures:

a. an access line would no longer be defined as the traditional "two copper pair placed in the ground;" instead, a line would be defined as "any revenue producing access line over which universal service is provided and meets the KCC's definition of a supported line";

b. the supplemental KUSF support process should minimize administrative costs and allow companies to be treated fairly, without penalizing any party. A request could be filed based on the net increase in lines as of each quarter-ending March 31, June 30, September 30, and December 31, or between quarters if a company experienced a 2% or greater net increase in lines during the 12-month period;

c. a net increase in access lines should be based on a rolling-12 month period, corresponding to the end of each quarter. A company's next year's KUSF support would be based on a company's September 30 line data, to be provided to Staff no later than November 15;

d. a supplemental KUSF support request should be submitted within 45-days of the end of a quarter, with any filing submitted after the 45-days automatically denied by the Commission;

e. the Commission has 120 days in which to review and approve a supplemental KUSF support application. A company must track its supported lines, by zone, to determine the net increase in access lines and at a minimum, submit forms to report the net increase in lines, the lines in each company's study area and/or exchange, and supporting documentation; and

⁴ Docket 236, February 14, 2000 Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions.

⁵ *In the Matter of a General Investigation Into Procedures for Supplemental Funding Requests Pursuant to K.S.A. 1999 Supp. 66-2008(e)*, Docket No. 00-GIMT-842-GIT (Docket 842).

f. an affected party should be defined as any company contributing to or receiving monies from the KUSF. Notification of a supplemental KUSF funding request would occur by the Commission opening a docket in which to address supplemental funding requests for a quarter. An interested party would monitor the Commission's website and could intervene in the docket.

Staff's Report stated that all of the parties agreed the supplemental funding procedures should be competitively neutral and be used as guidelines for new entrants to receive KUSF support. The parties also agreed that it may be necessary to revisit the procedures in the future.

6. On May 25, 2000, the Commission adopted the recommended procedures to request supplemental KUSF support, including the process for providing notice to affected parties.⁶ Notification included the creation of a new link, entitled "Quarterly Supplemental Funding Requests," and a new docket in which all requests for supplemental KUSF support for the same quarter would be addressed.

7. On February 26, 2010, Staff submitted a memorandum in Docket 349 and recommended that the Commission open a generic docket to address the current supplemental KUSF support procedures.⁷ In its March 5, 2010 Order, the Commission directed Staff to file a memorandum to open a generic proceeding to address whether the procedures for filing a request for supplemental KUSF support should be modified.⁸

8. On April 14, 2010, Staff submitted a memorandum (April Memo) to the Commission, recommending that the Commission open a generic proceeding to address whether the current supplemental KUSF funding procedures should be modified. Paragraph 5 of the June

⁶ *Id.*, May 25, 2000 Order Approving Procedures for Supplemental KUSF Funding.

⁷ *In the Matter of the Application of the Request of United Wireless Communications, Inc. for Kansas Universal Service Initial and Supplemental Fund Support*, Docket No. 10-UWCC-349-KSF (Docket 349), February 26, 2010 Notice of Filing Staff Memorandum, Staff Memorandum, p. 4.

⁸ Docket 349, March 5, 2010 Order Granting Request of United Wireless for Supplemental Kansas Universal Service Fund Support as Adjusted by Staff, ¶ 9.

Order encouraged parties to review the April Memo and, in paragraph 6, the Commission requested parties to file comments on the following issues:

- a. is the definition of a line eligible for supplemental KUSF support adequate;
- b. is the current filing frequency, allowing companies to request supplemental KUSF funding for lines in service at the end of each quarter or between quarters if a 2% or greater 12-month net increase in lines occurs, appropriate;
- c. how should prior adjustments adopted by the Commission be incorporated in the carrier's subsequent requests for supplemental KUSF support; and,
- d. what is the appropriate effective date for payment of supplemental KUSF support?

9. The supplemental KUSF support procedures apply to Southwestern Bell Telephone Company (SWBT), the United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink), and any competitor designated as an Eligible Telecommunications Carrier (ETC) for KUSF support purposes. The procedures do not apply to the rural local exchange companies (LECs) since their KUSF support is based on company-specific audits and is not adjusted for any change in access lines.⁹ Staff notes that when the current supplemental KUSF procedures were adopted, no competitive ETC received KUSF support. Today, six competitive ETCs receive KUSF support¹⁰ and three ETCs¹¹ have received ETC designation for KUSF support purposes, but have not yet filed a request for KUSF support. This has significantly increased the resources necessary to process initial and supplemental requests for KUSF support, as well as the demand for KUSF support monies.

⁹ *Bluestem Telephone Co. et al. v. Kansas Corporation Commission*, 33 Kan. App. 2d 817 (2005), and K.S.A. 2009 Supp. 66-2008(e).

¹⁰ Epic Touch Co., H&B Cable; Nex-Tech Inc.; Nex-Tech Wireless, Sage Telecom, Inc.; and United Wireless Communications.

¹¹ Wildflower Telecommunications, LLC; Big River Telephone, and NE Colorado Cellular, Inc.

II. SUPPLEMENTAL KUSF SUPPORT PROCEDURES

a. Is the definition of a line eligible for supplemental KUSF support adequate?

10. The current definition of an access line eligible for KUSF support is “any revenue producing access line over which universal service is provided and meets the KCC’s definition of a supported line.” Staff suggests that this definition be modified to recognize that the term “access line” may be replaced by a technological equivalent. The new definition should be “any revenue producing access line *or technological equivalent*, over which universal service is provided and meets the KCC’s definition of a supported line.” In addition, the definition of a “supported line” has changed since May 2000, with the changes occurring in numerous dockets. Staff believes that both current and future KUSF recipients would benefit if the Commission reiterates, in this docket, that the following lines are excluded from the definition of a “supported line”:

- non-revenue producing lines, including company-official and test lines,¹²
- non-Kansas jurisdictional lines;
- non-company owned lines, including payphones;
- lines that do not provide two-way, voice-grade quality, universal service (e.g. one-way alarm, fire, etc.) or that are used specifically for non-regulated purposes (e.g. Internet access);
- key and hunt lines, including all lines that terminate in a PBX, Centrex, or other hunt group setting.¹³ To ensure that KUSF support is distributed in a competitively and technologically neutral manner, a wireless business customer with four or more lines at the same billing address is treated as a

¹² *In the Matter of the Investigation to Determine the March 1, 2001 Assessment for the Fifth Kansas Universal Service Fund Year*, Docket No. 01-GIMT-235-GIT (Docket 235), January 19, 2001 Order Determining Assessment for the KUSF Starting March 1, 2001 and January 17, 2002 Order Determining Remaining Issue.

¹³ *In the Matter of an Investigation into the Kansas Universal Service Fund (KUSF) Mechanism for the Purpose of Establishing Cost-Based KUSF Support for Rural Exchange Companies*, Docket No. 02-GIMT-068-GIT and *In the Matter of an Investigation into the Kansas Universal Service Fund (KUSF) Mechanism for the Purpose of Modifying the KUSF and Establishing a Cost-Based Fund*, Docket No. 99-GIMT-326-GIT, May 24, 2002 Notice of Filing Staff Report: Synchronizing the Count of Single-Line Business Lines, by the Staff of the State Corporation Commission and July 22, 2002 Order Addressing Synchronization of Counting Single-Line Business Lines.

hunt line and all lines for that business are ineligible for KUSF support,¹⁴ and

- Primary Rate Interface (PRI) arrangements.¹⁵

11. The Commission has also determined that the billing address of a wireless customer determines the line's location for KUSF support purposes,¹⁶ and that concession lines - lines provided to current or former employees, board members, etc. at a reduced monthly rate - only receive KUSF support on the same basis as the monthly service rate for the line.¹⁷ For example, a concession line provided at one-half of the regular monthly service rate receives one-half of the per line KUSF support available in that study area or wire center.

b. Is the current filing frequency - allowing companies to request supplemental KUSF funding for lines in service at the end of each quarter or between quarters if a 2% or greater 12-month net increase in lines occurs - appropriate?

12. Staff suggests that this process should be modified to include a minimum threshold for the net percentage increase in lines for quarterly filings and to eliminate the option to file a request between quarters. The KUSF assessment rate is determined annually; however, the number of requests for supplemental KUSF support, or the amount of support requested, cannot be foreseen or estimated in Staff's KUSF assessment rate calculations. Limiting the filing of supplemental KUSF support requests to a quarterly basis will provide predictability of the frequency of such requests. And, while the calculation of the annual KUSF assessment rate

¹⁴ *In the Matter of GCC License Corporation's Petition for Designation as an Eligible Telecommunications Carrier (DBA Western Wireless)*, Docket No. 99-GCCZ-156-ETC, May 3, 2001 Order adopting Staff's January 3, 2001 Memorandum Report.

¹⁵ *In the Matter of a General Investigation to Determine the Assessment Rate for the Fourteenth Year of the Kansas Universal Service Fund Effective March 1, 2010*, Docket No. 10-GIMT-188-GIT, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Fourteen and Canceling January 20, 2009 Technical Hearing, dated January 13, 2010.

¹⁶ *In the Matter of a General Investigation Addressing Requirements for Designation of Eligible Telecommunications Carriers*, Docket No. 06-GIMT-446-GIT, October 2, 2006 Order Adopting Requirements for Designation of Eligible Telecommunications Carriers, ¶ 61.

¹⁷ Docket 235, January 2001 and January 2002 Orders (cites omitted).

includes a contingency fund, the amount of supplemental KUSF support requested cannot be estimated in the annual KUSF assessment rate calculation. Thus, the number, and amount, of supplemental KUSF support requests impact the amount of KUSF monies available during the year. Staff notes that these same concerns existed when the supplemental KUSF support procedures were developed,¹⁸ and the number of companies eligible to receive KUSF support has, and is expected, to continue to increase.

13. Under the current supplemental KUSF support procedures, a company must experience at least a 2% net increase in lines to file a request for supplemental KUSF support between quarters; however, it may file a request for supplemental KUSF support as of the end of a quarter in which it experienced any net increase in lines. Theoretically, a quarterly request for supplemental KUSF support could be made for a net increase of only one line. Thus, Staff supports modifying the quarterly filing option to include a minimum net increase in lines of 5%. Staff notes this is consistent with the positions supported by the parties in Docket 842, although a 2% threshold was discussed and implemented for the between-quarters option.¹⁹ With regard to the between-quarters option, the option has not been used since the supplemental KUSF procedures were adopted. Instead, companies have relied on the quarterly-filing option because the same time period is used for federal and other state Universal Service Fund (USF) support programs; thus, minimizing company resources.

c. How should prior adjustments adopted by the Commission be incorporated in the carrier's subsequent requests for supplemental KUSF support?

14. Staff supports modification to this process to require a company to file an amendment to a subsequent quarterly filing to reflect the adjustments adopted by the

¹⁸ Docket 842, Staff's March 22, 2000 Compilation of Comments Submitted, pp. 1-3; and April 2000 Report, p. 4.

¹⁹ *Id.*

Commission for a prior filing, unless Staff advises the company that such an amendment is not needed. Alternatively, the company could elect to forego back-to-back quarterly filings to ensure it recognizes all Commission-adopted adjustments in a subsequent filing. When a company files a request for supplemental KUSF support, it is required to locate its supported lines to the appropriate area (e.g. study area, exchange, and zone) to determine the net increase in access lines. At a minimum, the company is to submit forms to report the net increase in lines, the location of lines, and provide supporting documentation.

15. In its April 2010 Memo, Staff explained that most of its proposed adjustments to a company's filed supplemental KUSF support request are to correct address locations. Staff also explained that due to the ability to file quarterly requests, a company may file a request, based on a net increase in lines at the end of the subsequent quarter, prior to the Commission issuing an order on the current pending request. For example, a company filed a request for supplemental KUSF support based on the quarter-ending March 31 on May 15, with an order on the request due no later than September 12. However, on August 10, the company files a request for supplemental KUSF support based on the quarter-ending June 30; prior to the issuance of an order on the March 31 quarterly request.

16. To verify the reported data, Staff selects a sample of reported customer address locations and the Commission's Information Technology Geological Information Systems (ITGIS) remaps them. When errors are noted, Staff issues Data Requests (DRs) to notify the company of the corrected address location or to request further information from the company. For each address location correction, Staff proposes an adjustment to the company's filing. Staff was placed in the position of incorporating adjustments adopted for one request into a subsequent filing, while at the same time, reviewing the new filing and proposing adjustments to it. Staff

has a short timeframe in which to review a request for supplemental KUSF support and submit its recommendations to the Commission; thus, Staff began to request that the affected company file an amended request since it is responsible for filing an accurate request. Staff notes that it has advised the company that the 120-day period in the Commission has to issue an order is based on the date of the amended application; not the date of the original filing.

17. In its April Memo, Staff also suggested that a new docket on supplemental KUSF support requests include a review of options available to companies to map the location of customer addresses. Companies frequently ask Staff about mapping options since some mapping programs are costly and do not include exchange or zone-level data, which is needed for KUSF purposes. Staff advises that, while other free software may be available for use, GoogleEarth, Batchgeocode.com, and Mapquest offer free geocoding and/or mapping programs and are highly used by customers. The ITGIS division provides electronic copies of the incumbent LEC exchange boundary and Base Rate Areas (BRAs),²⁰ often referred to as “zones” for KUSF support purposes,²¹ maps to companies upon request. These files, provided as ESRI shape (.shp) or Google Earth (.kml) files, can be overlaid to GIS-data viewer programs, such as ESRI ArcExplorer or GoogleEarth.

18. The ITGIS division is in the process of incorporating all study areas, exchanges, and BRAs in the state of Kansas in the mapping files, with the intent that the completed files will

²⁰ All of SWBT’s study area has defined BRAs, as does the United Telephone Companies of Kansas exchanges. However, the United Telephone Company of Eastern Kansas and the United Telephone Company of Southcentral Kansas do not; thus, the Commission determined that the BRAs for these exchanges is the city limit boundary. (Docket 236, February 14, 2000 Order 6 Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions, ¶¶ 8-9).

²¹ The following areas include two zones for KUSF support purposes: SWBT’s study area, CenturyLink’s study areas, J.B.N. Telephone Company, Inc.’s study area; Madison Telephone Company, Inc.’s study area; and Pioneer Telephone Association, Inc.’s study area, as well as the exchanges Gorham Communications, Inc. and Rural Telephone Service Company, Inc. purchased from CenturyLink.

be available for download from the Commission's website within the next several months.²²

Once that occurs, the data can be downloaded and overlaid on a GIS-map viewer of the company's choice to identify the correct address location.

19. Staff notes that the on-line tools provide a reasonable level of address matching in populated areas of Kansas; however, they are not as accurate in rural Kansas where the majority of KUSF support is available. Currently, no mapping software program identifies post office and rural route addresses. Mapping results should be reviewed for errors, especially as the level of accuracy for locating addresses often depends on the amount and type of data entered into the program. For example, if an address in Lebanon, Kansas is entered without a zip code, the address may be identified as being located in Lebanon, Missouri; however, adding the zip code may result in the address being identified at the correct location. Staff notes that to increase the accuracy of its results, the ITGIS division generally uses two or three mapping programs to verify the address location. And, in some cases, the company is requested to provide a copy of the relevant rural county maps to compare to the exchange and BRA maps.

20. To address these issues, the ITGIS division is working in cooperation with the Data Access Support Center (DASC), located at the Kansas Geologic Survey (KGS), to develop an address-matching service for Kansas using locally-produced data from each county. KGS and state agencies are working with all of the counties to gather the location of each address in the state to develop an electronic, statewide address database. Staff was informed that, as of July 8, 2010, all counties in Kansas were E911 compliant; however, not all of them have moved completely away from rural route addresses. Furthermore, it will take some time to complete mapping all addresses to meet the address standards for road networks. This is a work-in-

²² The IT Division anticipates that the downloads would be available at the Commission's website at <http://kcc.ks.gov/telecom/kusfcomm2.htm>, under a new link created for the mapping overlays.

progress that will hopefully bear significant improvements in address matching across Kansas as agreements are made with local counties to share their data. The system, however, is in the early testing phase and is not expected to be operational for at least a year. This type of database would eventually be publicly available for companies to use to locate addresses and should help to minimize the incorrect identification of address locations.

d. What is the appropriate effective date for payment of supplemental KUSF support?

21. Staff believes that initial or supplemental KUSF support should be payable, effective the first of the month following a Commission order, for all companies. Staff believes this approach is consistent with K.S.A. 2009 Supp. 66-2008(b), which provides,

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. [emphasis added]

22. The supplemental KUSF support procedures adopted in 1997, and clarified in 1998, adopted an effective date of the first of the month following the month for which the line increase was reported (e.g. payment for a request based on lines as of March 31 was effective April 1). This changed after the current supplemental KUSF support procedures were adopted in Docket 842, as evidenced in Docket 140, where the Commission determined payment of the supplemental KUSF support was effective the first of the month following a Commission's order.²³ Staff notes that subsequent to the Commission's order in Docket 140, numerous legal and policy issues related to KUSF support arose, resulting in companies being unable to file

²³ *In the Matter of the General Investigation of Supplemental Funding Requests for the Quarter Ending June 30, 2000, Pursuant to Order Dated May 15, 2000 in Docket No. 00-GIMT-842-GIT and K.S.A. 1999 Supp. 66-2008(e), Docket No. 01-GIMT-140-GIT (Docket 140), November 7, 2000 Order Approving Supplemental Funding Requests by KanOkla Telephone Association, Inc. and Craw-Kan Telephone Coop., Inc.*

requests for initial and/or supplemental KUSF support until the issues were resolved.²⁴ In order to allow these companies to receive KUSF support, payment of initial and supplemental KUSF support became effective retroactive to the first of the month following the date on which the request was based. This approach has resulted in retroactive, one-time payments of KUSF support, an increase in the resources and administrative cost associated with such filings, and additional financial pressure on the KUSF. Since the legal and policy issues have been resolved, Staff believes that all initial and supplemental KUSF support should be effective the month following a Commission order; not retroactively. In addition, Staff believes that the current approach is not consistent with K.S.A. 2009 Supp. 66-2008(b) since a competitive ETC's KUSF support is adjusted retroactively, but a rural LEC's KUSF support (whether an increase or decrease) is adjusted effective the first of the month following a Commission order.

III. OTHER ISSUES

23. The current supplemental KUSF support procedures state:

Notification of a supplemental KUSF funding request will occur by the Commission opening a docket in which to address supplemental funding requests for a quarter. An interested party would monitor the Commission's website and could intervene in the docket.

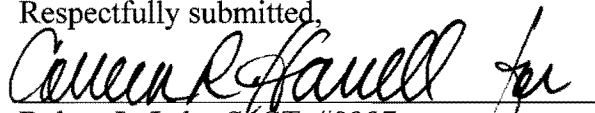
The June Order did not request comments on this issue; however, Staff believes this procedure should be modified. Although the process of opening a new docket for all quarterly supplemental KUSF support requests was used for numerous years; in recent years, a separate company-specific docket has been opened for each supplemental KUSF support request. Staff believes that this approach should continue, with notification occurring through posting the

²⁴ A petition regarding whether CMRS service was filed and pending before the Federal Communications Commission; issues regarding portability of KUSF support were pending in State Court; and the issue of competitive-neutrality was remanded back to the Commission.

docket and request to the Commission's website. Many of the industry representatives that participated in Docket 842 are no longer employed in the industry or responsible for monitoring KUSF support request dockets. Current employees often are not aware of the quarterly "one-docket-for-all" approach. In addition, a company-specific docket allows a person to readily identify that company has filed a request for supplemental KUSF support and monitor the number of requests filed by that company. It also avoids confidentiality-related concerns that may arise if two or more companies' data is filed in the same docket. And, a company-specific docket allows Staff and the ITGIS division to assign the time spent reviewing a company's filing to the company benefiting from the request.

WHEREFORE, Staff requests the Commission consider its comments as set forth above, and for such other and further relief as the Commission deems just and proper.

Respectfully submitted,



Robert L. Lehr, S. CT. #9997

Litigation Counsel

Kansas Corporation Commission

1500 S.W. Arrowhead Dr.

Topeka, KS 66604

(785) 271-3240 (Telephone)

(785) 271-3167 (Facsimile)

r.lehr@kcc.ks.gov

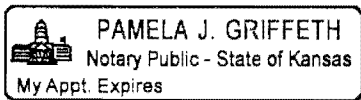
Attorney for Commission Staff

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) SS:

Sandy Reams, of lawful age being first duly sworn upon oath states:

That she is a Managing Auditor for the Corporation Commission Staff in this matter; that she has read and is familiar with the foregoing Comments of Commission Staff and that the statements made therein are true and correct to the best of her information, knowledge and belief.

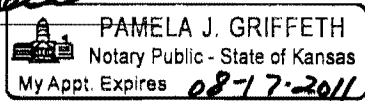


Sandy Reams

Sandy Reams

Subscribed and sworn to before me this 13th day of July 2010.

Pamela J. Griffeth
Notary Public



My appointment expires:

CERTIFICATE OF SERVICE

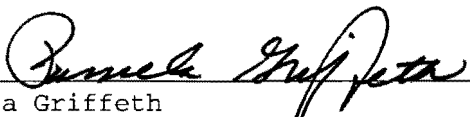
10-GIMT-667-KSF

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Comments of Commission Staff was placed in the United States mail, postage prepaid, or hand-delivered this 14th day of July, 2010, to the following:

DAVID SPRINGE, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
Fax: 785-271-3116
d.springe@curb.kansas.gov
**** Hand Deliver ****

BRUCE A. NEY, ATTORNEY, ROOM 515
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A AT&T
220 EAST SIXTH STREET
TOPEKA, KS 66603
Fax: 785-276-1948
bruce.ney@att.com

LINDA GARDNER, ATTORNEY, KSOPKJ0701
UNITED TELEPHONE CO. OF KANSAS
D/B/A CENTURYLINK
5454 W 110TH STREET
OVERLAND PARK, KS 66211-1204
Fax: 913-345-6756
linda.gardner@embarq.com



Pamela Griffeth
Administrative Specialist