

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

In the Matter of An Investigation to Determine)
the Assessment Rate and the Affordable Local)
Service Rate for Rate-of-Return Regulated) Docket No. 17-GIMT-008-GIT
Carriers for the Twenty-First Year of the Kansas)
Universal Service Fund, Effective March 1, 2017.)

REVISED NOTICE OF ALLOCATION METHODOLOGY
UTILIZED BY COMCAST PHONE OF KANSAS, LLC

COMES NOW Comcast Phone of Kansas, LLC ("Comcast"), by its undersigned counsel, to notify the State Corporation Commission of the State of Kansas ("Commission") of the methodology used by Comcast to allocate revenue to the intrastate jurisdiction for purposes of the Kansas Universal Service Fund ("KUSF"). For its Revised Notice, Comcast states as follows:

1. Pursuant to K.S.A. 66-2008(a), the Commission requires "every telecommunications carrier, telecommunications public utility and wireless telecommunications service provider that provides intrastate telecommunications service and, to the extent not prohibited by federal law, every provider of interconnected VoIP service, as defined by 47 C.F.R. 9.3 (October 1, 2005), to contribute to the [Kansas Universal Service Fund] on an equitable and nondiscriminatory basis." On December 27, 1996, in Docket No. 94-GIMT-478-GIT, the Commission stated the contribution would be an annual assessment on each provider's intrastate retail revenues.

2. In its January 24, 2012 *Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing* ("Order") in Docket No. 12-GIMT-168-GIT ("12-168 Docket"), the Commission directed all wireless carriers and interconnected

VoIP providers that use the direct assignment or traffic study methodology to update their factors at least annually.

3. On February 1, 2012, the Commission issued its *Amended Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing* (“Amended Order”) in the 12-168 Docket. In its Amended Order, among other things, the Commission adopted Staff’s recommendation that wireless and VoIP providers are required to submit a pleading to the Commission if the provider elects to use an allocation methodology other than the Safe Harbor. A pleading must also be filed if a company elects a new methodology. The Commission further adopted Staff’s recommendation that companies provide an affidavit, signed by an officer of the company, verifying that the same methodology and the inverse traffic factors are used for federal Universal Service Fund purposes. Companies are required to provide updates to its methodology and allocation factors at least annually, even if such pleading verifies that no change has occurred. Amended Order at ¶¶ 8-9.

4. In accordance with the Commission’s above-referenced orders in the 12-168 Docket, on February 28, 2018, Comcast filed its initial Notice and Confidential Affidavit of Donald S. Tyrie, Vice President of Accounting for Comcast, setting out Comcast’s methodology for allocating intrastate revenue for KUSF (and inversely, federal USF) purposes during the period covered in KUSF Year 21. Subsequent to the February 28, 2018 filing, Commission Staff contacted Comcast and asked Comcast to provide additional detail pertaining to the specific allocations generated by Comcast’s methodology and, further, to provide such detail dating back to 2012. In response to Staff’s request, Comcast submits the attached Supplemental Confidential Affidavit of Andrew Marte, Vice President for Comcast Phone of Kansas, LLC, which includes the specific allocations used by Comcast for the period 1Q 2012 through 1Q 2018.

5. Comcast asserts that it uses the same methodology for both KUSF and federal USF purposes.

WHEREFORE, Comcast respectfully requests that the Commission accept the allocation methodology for KUSF purposes as described in the attached Supplemental Confidential Affidavit of Andrew Marte, Vice President of Comcast Phone of Kansas, LLC, utilized during the period 1Q 2012 through 1Q 2018.

Respectfully submitted,

/s/ Susan B. Cunningham

Susan B. Cunningham, KS #14083
Dentons US LLP
7028 SW 69th Street
Auburn, KS 66402
Direct: (816) 460-2441
Cell: (785) 817-1864
Fax: (816) 531-7545
Email: susan.cunningham@dentons.com

Attorney for Comcast Phone of Kansas, LLC

July 18, 2018

VERIFICATION

K.S.A. 53-601

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Revised Notice of Allocation Methodology Utilized by Comcast Phone of Kansas, LLC ("Comcast"), to be prepared on behalf of Comcast, and that the contents thereof are true and correct to the best of my knowledge, information and belief.

/s/ Susan B. Cunningham

Susan B. Cunningham

July 18, 2018

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Revised Notice of Allocation Methodology Utilized by Comcast Phone of Kansas, LLC was served via electronic mail this 18th day of July, 2018, to the parties appearing on the Commission's service list as last modified on July 17, 2018.

/s/ Susan B. Cunningham

Susan B. Cunningham