

**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. 18-GIMT-084-GIT  
Carriers for the Twenty-Second Year of the Kansas )  
Universal Service Fund, Effective March 1, 2018. )

**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 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 their 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, Comcast files this Notice and attached Confidential Affidavit of Andrew Marte, Vice President 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 22 and consistent with its allocation methodology as of 2012.

*[The remainder of this page is intentionally left blank.]*

WHEREFORE, Comcast respectfully requests that the Commission accept the allocation methodology for KUSF purposes as described in the attached Confidential Affidavit of Andrew Marte, Vice President for Comcast, utilized during the period covered in KUSF Year 22.

Respectfully submitted,

/s/ Mark P. Johnson

---

Mark P. Johnson, KS #22289  
Dentons US LLP  
4520 Main Street, #1100  
Kansas City, MO 64111  
Direct: (816) 460-2424  
Cell: (816) 456-5044  
Fax: (816) 531-7545  
Email: mark.johnson@dentons.com

*Attorney for Comcast Phone of Kansas, LLC*

February 28, 2019

**VERIFICATION**

K.S.A. 53-601

STATE OF MISSOURI     )  
                                      )  
COUNTY OF JACKSON    )     ss:

I, Mark P. Johnson, verify under penalty of perjury that I have caused the foregoing 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/ Mark P. Johnson

\_\_\_\_\_  
Mark P. Johnson

February 28, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Notice of Allocation Methodology Utilized by Comcast Phone of Kansas, LLC was served via electronic mail this 28th day of February, 2019, to the parties appearing on the Commission's service list as last modified on November 20, 2018.

/s/ Mark P. Johnson

\_\_\_\_\_  
Mark P. Johnson