

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Petition of Wamego)	
Telecommunications Company, Inc. for an)	Docket No. 20-WTCT-139-CXB
Order Modifying the Boundary of its Wamego)	
Local Exchange Area)	

AMENDED PETITION OF WAMEGO TELECOMMUNICATIONS COMPANY
FOR AN ORDER MODIFYING THE BOUNDARY OF ITS
WAMEGO LOCAL EXCHANGE AREA

Comes now Wamego Telecommunications Company, Inc. ("Wamego"), a Kansas corporation, and requests that the State Corporation Commission of the State of Kansas ("Commission") issue an Order modifying its prior Orders specifying and defining the boundary of the Wamego local exchange area. This Amended Petition is submitted to conform to an exchange definition identified as correct by Commission Staff. In support thereof Wamego states:

1. Wamego is a Kansas local exchange carrier and rural telephone company as defined in K.S.A. 2017 Supp. 66-1,187, providing local exchange and exchange access service pursuant to certification issued by the Commission.
2. Wamego's incumbent study area includes the Wamego exchange area, which is adjacent to the Alma exchange area served by Century Link as the incumbent local exchange carrier.
3. Wamego has received a request for basic and advanced services from two consumers located in the Alma exchange area where CenturyLink is the incumbent local exchange carrier; those consumers' locations are generally adjacent or reasonably near to the boundary between the Alma and Wamego exchange areas. While those

consumers are within the presently defined Alma exchange area Century Link does not offer all services requested by these consumers at these consumers' locations.

4. Century Link has no objection to this request that the Wamego boundary be expanded to include these consumers' limited locations in order to allow Wamego to install facilities as the incumbent local exchange carrier and provide the requested services to the requesting consumers.

5. The current Wamego boundary definition is as follows:

Beginning at a point $\frac{1}{4}$ mile south of the northwest corner of Section 10, T 8 S, R 11 E, Pottawatomie County, Kansas; thence south $1\frac{1}{4}$ miles; thence east $3\frac{3}{4}$ miles; thence south $3\frac{1}{2}$ miles; thence east $\frac{3}{4}$ mile; thence south $2\frac{1}{2}$ miles; thence west 3 miles; thence south $\frac{3}{4}$ mile; thence west $\frac{1}{8}$ mile; thence south $\frac{3}{4}$ mile; thence west $\frac{3}{8}$ mile to the southwest corner of Section 23, T 9 S, R 11 E; thence south approximately $3\frac{3}{4}$ miles to the center of the Kansas River; thence in a westerly direction along the center line of said river to a point $\frac{1}{4}$ mile east of the east line of Section 7, T 10 S, R 11 E; thence south approximately $2\frac{1}{2}$ miles to a point $\frac{1}{4}$ mile east and $\frac{1}{4}$ mile north of the southwest corner of Section 20, T 10 S, R 11 E, Wabaunsee County, Kansas; thence east 1 mile; thence south $1\frac{1}{2}$ miles; thence west 1 mile; thence south $\frac{1}{2}$ mile; thence west approximately $1\frac{5}{8}$ miles to a point $\frac{1}{4}$ mile north and $\frac{1}{4}$ mile west of the northeast corner of Section 1, T 11 S, R 10 E; thence south $1\frac{1}{8}$ miles; thence west $2\frac{3}{4}$ miles; thence south $1\frac{1}{8}$ miles; thence west 1 mile; thence south 1 mile; thence west 1 mile to the southeast corner of Section 18, T 11 S, R 10 E, Wabaunsee County, Kansas; thence south $\frac{1}{4}$ mile; thence West $\frac{3}{4}$ mile; thence north $\frac{1}{8}$ mile; thence west $2\frac{3}{4}$ miles; thence north $3\frac{1}{8}$ miles to a point $\frac{1}{2}$ mile west of the northeast corner of Section 3, T 11 S, R 9 E, Riley County, Kansas; thence to a point $\frac{1}{2}$ mile west of the southeast corner of section 34, T 10 S, R 9 E;

thence north approximately $3\frac{1}{4}$ miles to the center of the Kansas River; thence in an easterly direction along the center line of said river to a point $\frac{1}{4}$ mile west of the east line of section 23, T 10 S, R 9 E; thence north approximately $1\frac{1}{2}$ miles to a point $\frac{1}{4}$ mile north and $\frac{1}{4}$ mile west of the southeast corner of Section 11, T 10 S, R 9 E, Pottawatomie County, Kansas; thence west $1\frac{1}{8}$ miles; thence north $\frac{5}{8}$ mile; thence west $\frac{3}{8}$ mile; thence north $1\frac{3}{8}$ miles; thence east $\frac{1}{2}$ mile; thence north $7\frac{1}{4}$ miles to a point $\frac{1}{4}$ mile west and $\frac{1}{2}$ mile north of the southeast corner of Section 27, T 8 S, R 9 E; thence east $1\frac{3}{4}$ miles; thence north $2\frac{1}{4}$ miles; thence east $1\frac{3}{4}$ miles; thence north 1 mile; thence east $7\frac{3}{4}$ miles to the point of beginning.

6. Wamego requests that its boundary definition be modified to read as follows, with the changed portion reflected in bold and the portion that would expand into the present Alma exchange area underlined:

Beginning at a point $\frac{1}{4}$ mile south of the northwest corner of Section 10, T 8 S, R 11 E, Pottawatomie County, Kansas; thence south $1\frac{1}{4}$ miles; thence east $3\frac{3}{4}$ miles; thence south $3\frac{1}{2}$ miles; thence east $\frac{3}{4}$ mile; thence south $2\frac{1}{2}$ miles; thence west 3 miles; thence south $\frac{3}{4}$ mile; thence west $\frac{1}{8}$ mile; thence south $\frac{3}{4}$ mile; thence west $\frac{3}{8}$ mile to the southwest corner of Section 23, T 9 S, R 11 E; thence south approximately $3\frac{3}{4}$ miles to the center of the Kansas River; thence in a westerly direction along the center line of said river to a point $\frac{1}{4}$ mile east of the east line of Section 7, T 10 S, R 11 E; thence south approximately $2\frac{1}{2}$ miles to a point $\frac{1}{4}$ mile east and $\frac{1}{4}$ mile north of the southwest corner of Section 20, T 10 S, R 11 E, Wabaunsee County, Kansas; thence east 1 mile; thence south $1\frac{1}{2}$ miles; thence west 1 mile; thence south $\frac{1}{2}$ mile; thence west approximately $1\frac{5}{8}$ miles to a point $\frac{1}{4}$ mile north and $\frac{1}{4}$ mile west of the northeast corner of Section 1, T 11 S, R 10 E; thence south $1\frac{1}{8}$ miles; **thence west to a point 1712 feet east**

and north 660 feet from the N.E. corner of the NW ¼ of Sec. 10, T 11 S, R 10 E thence south 1601 feet, thence west 967 feet, thence south 276 feet, thence west to the existing centerline of Highway K-99, thence north and northwesterly along the existing centerline of Highway K-99 to a point on an east–west line 660 feet north of the north line of Section 10, T 11 S , R 10 E, thence west to the northwest corner of Section 10, T 11 S , R 10 E; thence south 1 ⅛ miles; thence west 1 mile; thence south 1 mile; thence west 1 mile to the southeast corner of Section 18, T 11 S , R 10 E, Wabaunsee County, Kansas; thence south ¼ mile; thence West ¾ mile; thence north ⅛ mile; thence west 2 ¾ miles; thence north 3 ⅛ miles to a point ½ mile west of the northeast corner of Section 3, T 11 S, R 9 E, Riley County, Kansas; thence to a point ½ mile west of the southeast corner of section 34, T 10 S, R 9 E; thence north approximately 3 ¼ miles to the center of the Kansas River; thence in an easterly direction along the center line of said river to a point ¼ mile west of the east line of section 23, T 10 S, R 9 E; thence north to a point ¼ mile north and ¼ mile west of the southeast corner of Section 11, T 10 S, R 9 E, Pottawatomie County, Kansas; thence west 1 ⅛ miles; thence north ⅝ mile; thence west ⅜ mile; thence north 1 ⅜ miles; thence east ½ mile; thence north 7 ¼ miles to a point ¼ mile west and ½ mile north of the southeast corner of Section 27, T 8 S, R 9 E; thence east 1 ¾ miles; thence north 2 ¼ miles; thence east 1 ¾ miles; thence north 1 mile; thence east 7 ¾ miles to the point of beginning.

7. There are no consumers receiving local exchange service through resale or subject to interconnection agreement that would be affected by the proposed modification of exchange area boundaries.

8. Wamego is advised CenturyLink intends to file a concurrent petition requesting a complementary modification of the boundary of its Alma local exchange area.

WHEREFORE Wamego prays that the Commission issue its Order herein modifying any and all prior Orders defining the Wamego exchange area and approving the new definition of that exchange area as set forth herein; and that Wamego be deemed the incumbent local exchange carrier, and carrier of last resort pursuant to K.S.A. 66-2009, for the entire Wamego exchange area as modified.

Respectfully submitted,


Thomas E. Gleason, Jr. #7742
GLEASON & DOTY, CHARTERED
PO Box 6
Lawrence, KS 66044-0006
(785) 842-6800 voice
(785) 856-6800 fax
gleason@sunflower.com
Attorney for Wamego Telecommunications
Company, Inc.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF DOUGLAS)

Thomas E. Gleason, Jr., of lawful age, being first duly sworn upon oath, states:

I am an attorney for Wamego Telecommunications Company, Inc. I have read the above and foregoing Petition, and upon information and belief, state that the matters therein appearing are true and correct.

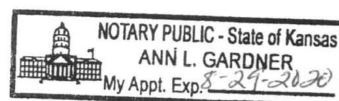

Thomas E. Gleason, Jr.

SUBSCRIBED AND SWORN to before me this 3rd day of October, 2019.


Notary Public

My Commission Expires:


8-29-2020



CERTIFICATE OF SERVICE

I, the undersigned Thomas E. Gleason, Jr., attorney for the petitioner, hereby certify that on October 3, 2020 I served electronically a true and correct copy of the above and foregoing Amended Petition on the following:

WALKER HENDRIX, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
w.hendrix@kcc.ks.gov



Thomas E. Gleason, Jr.