

LAW OFFICES
JAMES M. CAPLINGER, CHARTERED
823 S.W. 10TH AVE.
TOPEKA, KS 66612-1618

JAMES M. CAPLINGER (1929 – 2015)
JAMES M. CAPLINGER, JR.
COLLEEN R. JAMISON

(785) 232-0495
Fax (785) 232-0724
jrcaplinger@caplinger.net
colleen@caplinger.net

June 28, 2018

Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 Arrowhead Rd
Topeka, KS 66604

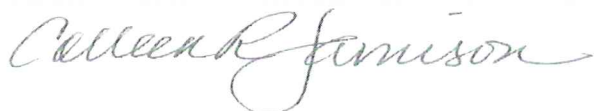
RE: Docket 18-GIMT-394-GIT
Section 254(e) certifications

Dear Ms. Retz:

On behalf of S & T Telephone Cooperative Association, attached please find for filing in Docket No. 18-GIMT-394-GIT the 254(e) certifications required by the Commission to be filed in this docket by July 2, 2018.

In this filing, Attachment 2a, lines 240, 245, and 255 as well as the entirety of Attachment 4 has been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket. As always, if you have any questions, please do not hesitate to contact me.

Cordially yours,



Colleen R. Jamison

cc: Zack Odell

Encl.

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Chair Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Pat Apple

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 18-GIMT-394-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

SECTION 254(e) CERTIFICATION
FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT
FCC Docket Reference: CC Docket No. 96-45
and KANSAS UNIVERSAL SERVICE FUND SUPPORT
(Please type or print legibly)
(Circle all appropriate support received)

1. My title is CEO of S&T Telephone Cooperative Association. In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), Connect America Fund (CAF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding S&T Telephone Cooperative Association to the statements made in this certification.

2. S&T Telephone Cooperative Association was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GIMT-241GIT by order dated December 5, 1997 and KUSF support purposes in Docket No. 98-GIMT-241GIT by order dated December 5, 1997.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by S&T Telephone Cooperative Association was used in the proceeding calendar year 2017 and will be used in the new calendar year 2019 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

Attachment 1

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

(Pursuant to Kan. Stat. Ann. 53-601.)


Signature

Zack Odell
Printed/Typed Name

Executed on 6.27.2018 date.

Email address: zack.odell@sttelcom.com

Company Name: S&T Telephone Cooperative AssociationDATA YEAR: 2017

	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	2,194
2. Category 1.3 Loops	(070)	2,175
INVESTMENT		
1. Plant Accounts		
a. Acct 2001	(160) \$	58,875,593
2. Selected Plant Accounts		
a. Acct 2210	(230)	1,557,334
b. Acct 2220	(235)	0
c. Acct 2230	(240)	
d. Total Central Office Equip	(245)	
e. Circuit Equip Cat 4.13	(250)	7,499,184
f. Acct 2410	(255)	
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 Tot Assets	(800)	0
Acct. 2680 (2230) COE Trans	(805)	0
Acct. 2680 (Cat. 4.13) COE Trans	(810)	0
Acct. 2680 (2410) Total CWF	(815)	0
Acct. 2680 (2410) CWF-Cat 1	(820)	0
Acct. 6560 (2680) Dep & Amort	(830)	0
PART 36 - COST STUDY DATA		
1. Cost Study Avg C&WF Acct 2410	(700)	43,573,597
2. Cost Study Avg C&WF Cat 1	(710)	41,517,346
3. C&WF CAT 1 Factor		0.952810
4. COE CAT 4.13 Factor		0.651535
5. Switching Factor		1.000000

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2017

For the Following Lines, Use Gross Additions for Plant and Annual Amounts
for Expenses for the Test Year

INVESTMENT, EXPENSE AND TAXES	LINE	REGULATED AMOUNT
1. Selected Plant Accounts		
a. Acct 2230	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110	(335)	0
b. Acct 6110 (benefits)	(340)	0
c. Acct 6110 (rents)	(345)	0
d. Acct 6120	(350)	1,139,048
e. Acct 6120 (benefits)	(355)	106,045
f. Acct 6120 (rents)	(360)	0
g. Acct 6210	(365)	160,557
h. Acct 6210 (benefits)	(370)	29,294
i. Acct 6210 (rents)	(375)	0
j. Acct 6220	(380)	0
k. Acct 6220 (benefits)	(385)	0
l. Acct 6220 (rents)	(390)	0
m. Acct 6230	(395)	322,899
n. Acct 6230 (benefits)	(400)	102,056
o. Acct 6230 (rents)	(405)	0
p. (sum of lines 365+380+395)	(410)	483,456
q. Acct 6410	(430)	1,053,961
r. Acct 6410 (benefits)	(435)	350,542
s. Acct 6410 (rents)	(440)	0
t. Total Expenses Accts. 6110 - 6410	(445)	\$ 2,676,465
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	90,948
b. Acct 6530 (benefits)	(455)	7,461
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210)	(510)	49,889
b. Acct 6560 (#2220)	(515)	0
c. Acct 6560 (#2230)	(520)	779,499
d. Acct 6560 (#2210-2230)	(525)	\$ 829,388
e. Acct 6560 (#2410)	(530)	1,820,404
5. Corporate Operating Expenses		
a. Acct 6710	(535)	380,145
b. Acct 6710 (benefits)	(540)	53,169
c. Acct 6720	(550)	844,174
d. Acct 6720 (benefits)	(555)	153,305
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ 1,224,319
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	1,075,380
b. Rents Portion	(610)	0
Sum of All Expenses (Excluding Depreciation)		\$ 3,991,732
7. Taxes		
a. Acct 7200	(650)	283,456

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2017

Test for use of FUSF & KUSF

CAPITAL:

1. Category 1 C&WF	74,366
2. Category 4.13 COE and Switching	67,569

MAINTENANCE:

3. CWF - MAINT. EXP.	670,224
4. COE - MAINT. SW	131,263
5. COE - MAINT-OP SYSTEM	-
6. COE - MAINT. - TRANS.	166,401
7. CWF - NETWORK SUPPORT	0
8. COE - NETWORK SUPPORT	0
9. CWF GENERAL SUPPORT	728,444
10. COE GENERAL SUPPORT	158,901
20. CWF NETWORK OPERATION	58,873
21. COE NETWORK OPERATION	12,842
22. CWF EXEC. & PLANNING	230,574
23. COE EXEC. & PLANNING	50,297
24. CWF GENERAL ADMIN.	487,180
25. COE GENERAL ADMIN.	106,273
26. CWF OPERATING TAXES	199,885
27. COE OPERATING TAXES	43,602
28. CWF BENEFITS - TTL OPER EXP	758,327
29. COE BENEFITS - TTL OPER EXP	165,420
30. CWF RENTS - TTL OPER EXP	0
31. COE RENTS - TTL OPER EXP	0

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2017

A. Total Cash Expenditures Associated with USF	4,110,443
<u>B. Certified Federal USF Receipts:</u>	
B1. High Cost Loop Support / Frozen High Cost Support	3,672,667
B2. Safety Net Support	
B3. Broadband Loop Support	
B4. Safety Valve Support for acquired Exch.	
B5. Connect America Cost Model	
B6. Alternative Connect America Model	
B7. CAF ICC (§§ 51.915, 51.917, 51.304)	
B8. Total Certified Federal USF Receipts	<u>\$ 3,672,667</u>
C. KUSF Receipts	1,238,757
D. Total FUSF and KUSF Receipts	4,911,424
E. Do Expenditures Exceed FUSF Receipts?	Yes
Amount Expenditures Exceed Certified FUSF (negative number means FUSF exceeds Expenditures)	\$ 437,775.74 [A - B8]
F. Do Expenditures Exceed FUSF & KUSF Receipts?	No
Amount Expenditures Exceed Certified FUSF and/or KUSF (negative number means FUSF/KUSF exceeds Expenditures)	(800,981) [A - D]

Please provide the following information:

Contact: Daniel Meszler

Title: Senior Regulatory Consultant

Phone No.: 71-266-4334

E-Mail: dmeszler@tcatel.com

18-GIMT-394-GIT
Attachment 4

ETC Certification for Use of **USF** Support
Provided to the Kansas Corporation Commission

Data Year: 2017

NOTES:

Contact: Daniel Meszler
Title: Senior Regulatory Consultant

Phone No.: 71-266-4334
E-Mail: dmeszler@tcatel.com

18-GIMT-394-GIT
Attachment 4

ETC Certification for Use of **USF** Support
Provided to the Kansas Corporation Commission

Supplemental
PagesPage 2

Annual ETC Certification of Requirements Imposed by the
Commission in Docket Number 06-GIMT-446-GIT

1. All ETCs must provide detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 CFR 4.5(e).

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected
4/30/17	Blizzard-unable to reach the CO when generators went down and battery backups lost functionality	PHONE	Dighton, Healy, Menlo	Monthly Maintenance & testing of equipment were implemented	897

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

NONE

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

3

4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. Please complete the following, as applicable to your company:

QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is CEO of the S&T Telephone Cooperative Association. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding S&T Telephone Cooperative Association to the statements made in this certification.

2. By this affidavit, I certify that S&T Telephone Cooperative Association is in compliance with the Commission's quality of service standards as adopted in Docket No. 191,206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6.27.2018 (date).

Zack Odell
Signature

Zack Odell

Printed/Typed Name

QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is _____ of the _____
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding _____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/ Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on _____ (date).

Signature

Print / Typed Name

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is CEO of the S&T Telephone Cooperative Association. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding S&T Telephone Cooperative Association to the statements made in this certification.

2. By this affidavit, I certify that S&T Telephone Cooperative Association is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on

6.27.2018 (date).



Signature

Zack Odell

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services throughout the service area for which it has been designated "using media of general distribution."

Please complete the following:

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
S&T WEBSITE	INTERNET	WORLDWIDE	24 / 7 /365
S&T ANNUAL PHONE DIRECTORY	PRINT	Brewster, Colby, Dighton, Goodland, Grinnell, Kanorado, Levant, Menlo, Russell Springs, Winona, Atwood, Bird City, Gove, Grainfield, Hoxie, Leoti, McDonald, Oakley, Sequin, Sharon Springs, Tribune, Wallace, & Weskan – customers and non-customers receive the directory in the mail as long as they have a mailing address with the post office	NOVEMBER

18-GIMT-394-GIT
Attachment 6

KGCR FM	RADIO	NORTHWEST KANSAS	VARIES
KRDQ	RADIO	NORTHWEST KANSAS	VARIES
KWGB-FM	RADIO	NORTHWEST KANSAS	VARIES
KXXX/KQLS	RADIO	NORTHWEST KANSAS	VARIES
KLOE AM	RADIO	NORTHWEST KANSAS	VARIES
S&T MEDIA	CATV	SERVICE AREAS	VARIES
VARIOUS	NEWSPAPERS	NORTHWEST KANSAS	VARIES
OPEN SPACES	RADIO	NORTHWEST KANSAS	MONTHLY

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.

_____ N/A _____

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

1. My title is _____ of the _____
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding _____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/ Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on _____ (date).

Signature

Printed/Typed Name