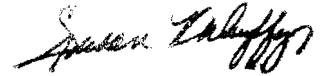


**BEFORE THE STATE CORPORATION COMMISSION** STATE CORPORATION COMMISSION  
**OF THE STATE OF KANSAS**

APR 15 2010



Generic Proceeding to Address Kansas Universal )  
Service Fund Support Supplemental Funding )  
Procedures, as Adopted by the Commission in ) Docket No. 10-GIMT- 667 -KSF  
Docket No. 00-GIMT-842-GIT. )

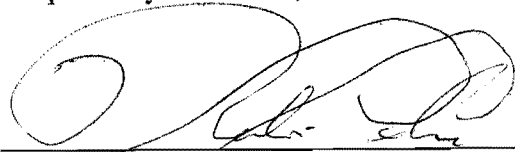
**NOTICE OF FILING OF STAFF MEMORANDUM**

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), and for its Notice of Filing of Staff Memorandum states as follows:

1. Staff hereby files the attached Staff Memorandum indicating that the Commission should open a generic proceeding to address whether the Kansas Universal Service Fund (KUSF) supplemental procedures adopted in 2000 should be modified. Staff further suggests that, at a minimum, the generic proceeding address the following issues: 1) how to ensure Commission adopted adjustments in one filing are incorporated in the company's subsequent requests for supplemental KUSF support; 2) ways to increase the accuracy of a company's filing, including options for a company to map its customers' locations; 3) whether the current filing frequency is appropriate; and, 4) the appropriate effective date for payment of supplemental KUSF support.

WHEREFORE, Staff requests the Commission consider its memorandum and for such other and further relief as the Commission deems just and proper.

Respectfully submitted,



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For Commission Staff

**VERIFICATION**

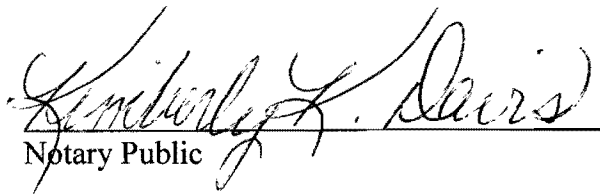
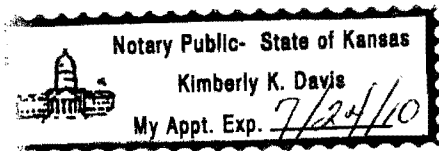
STATE OF KANSAS                    )  
  ) ss.  
COUNTY OF SHAWNEE            )

Robert L. Lehr, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Notice of Filing of Staff Memorandum* and believes that the statements therein are true to the best of his knowledge, information and belief.



Robert L. Lehr, S. Ct. #9997  
Litigation Counsel  
The State Corporation Commission  
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 15<sup>th</sup> day of April, 2010.

  
Notary Public

My Appointment Expires: July 24, 2010

MEMORANDUM

To: Thomas E. Wright, Chairman  
Joseph F. Harkins

From: Sandy Reams

Date: April 12, 2010

Re: Generic Proceeding to address Kansas Universal Service Fund Support Supplemental Funding Procedures, as adopted by the Commission in Docket No. 00-GIMT-842-GIT.

Submitted to Legal: 4/13/10

Submitted to Commission: 4/15/10

**BACKGROUND:**

Kansas statute, K.S.A. 1998 Supp. 66-2008(e), provides, in part, that,

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.

In a December 27, 1996 Order in Docket No. 94-GIMT-478-GIT (Docket 478),<sup>1</sup> the Commission found that K.S.A. 1998 Supp. 66-2008(e) required it to issue an order on a supplemental KUSF funding request within 120 days, allowed new entrants to qualify for supplemental KUSF funding, and companies could receive monies for additional lines on a per month basis from the administrator. In its February 3, 1997 Order on Reconsideration in Docket 478, the Commission clarified, in paragraph 66, that KUSF would be paid on a per line basis, and that for supplemental funding purposes, a carrier would report additional lines to the KUSF administrator. The

<sup>1</sup> Docket No. 94-GIMT-478-GIT (190,492-U), December 27, 1996 Order, ¶ 126.

Commission further stated that the increase in lines would be a net of gains and losses, and that a carrier is not required to report only a decline in its lines.<sup>2</sup>

When the supplemental funding process was implemented, a company was allowed to submit a one-page form to the KUSF administrator whenever it experienced an increase in lines, often monthly.<sup>3</sup> The KUSF administrator performed a reasonableness-check, recalculated the company's KUSF support, and the increase in KUSF support became effective the following month. Companies requested supplemental KUSF support funding for an additional 7,800 access lines between March 1, 1997 and October 31, 1999, resulting in an annual increase of \$287,000 in the KUSF.

Staff raised concerns regarding whether the process of allowing a company to submit a supplemental funding request to the KUSF administrator whenever it experienced a growth in access lines would be in compliance with K.S.A. 1998 Supp. 66-2008(e).<sup>4</sup> First, Staff was concerned that the adopted procedure did not comply with the statutory language regarding a net percentage increase in lines over a 12-month period. Staff was also concerned that the supplemental funding process did not allow affected parties to review, verify, or intervene in the process. Finally, Staff was concerned whether the Commission was to issue an order on a supplemental KUSF support request. Staff noted that the Legislative Division of Post Audit found that the Commission may wish to address this issue and recommended that the Commission seek comments and adopt administrative guidelines regarding supplemental funding requests.

In a February 14, 2000 Order in Docket 236,<sup>5</sup> the Commission agreed with Staff's concerns regarding whether the adopted supplemental funding process was consistent with the requirements of K.S.A. 1998 Supp. 66-2008(e). The Commission noted Staff's recommendation that it seek industry comments and noted that Staff and other parties to the docket generally agreed that the Commission should direct the parties to develop and propose administrative guidelines and procedures to address applications seeking KUSF supplemental support. The Commission also noted that all supplemental KUSF funding had been distributed by the KUSF administrator based on the net monthly line count increase reported to the administrator. The Commission directed the KUSF administrator to stop processing the monthly supplemental funding requests, effective March 1, 2000 and stated it would not entertain any new supplemental funding requests prior to March 1, 2001. New applications for supplemental funding would be based on a net increase in eligible lines during the 12-month period of March 1, 2000 through February 28, 2001, or later. Staff was directed to meet with Citizens' Utility Ratepayer Board (CURB) and telecommunications industry representatives to develop procedures for supplemental KUSF funding requests and to file a report and recommendations in a new docket no later than May 1, 2000.

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<sup>2</sup> Docket 478, February 3, 1997 Order on Reconsideration, ¶ 66.

<sup>3</sup> Docket No. 00-GIMT-236-GIT, December 22, 1999 Direct Testimony of Sandra K. Reams, pp. 10-12.

<sup>4</sup> Id.

<sup>5</sup> Docket 236, February 14, 2000 Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions.

Through a letter dated February 21, 2000<sup>6</sup> Staff requested comments from CURB and members of the telecommunications industry, and to advise the parties that a meeting was scheduled at the Commission's offices on March 30, 2000. On March 22, 2000, Staff filed a compilation of the comments in Docket 842 and on April 28, 2000, Staff filed its Report and Recommendations (Report). The Report, page 2, noted that all parties agreed with the recommended supplemental KUSF funding procedures in the Report, that the recommended procedures may need to be revisited in the future to determine if modifications were necessary to them, and that the procedures would be used as a guideline for new entrants. The Report, which focused on a competitively-neutral process for KUSF supplemental funding requests, contained the following recommendations, which were adopted by the Commission on May 25, 2000:<sup>7</sup>

1. An access line would no longer be defined as the traditional "two copper pair placed in the ground." To be more technologically neutral, an access line should be defined as "any revenue producing access line over which universal service is provided and meets the KCC's definition of a supported line."
2. The process should minimize administrative costs and allow local exchange carriers (LECs) and new entrants to be treated fairly, without penalizing any party. For administrative ease, companies could use the line data as of each quarter ending March 31, June 30, September 30, and December 31, for KUSF support supplemental funding requests. Alternatively, companies could file a request for KUSF support between quarters if it experienced a 2% or greater 12-month net increase in access lines.
3. 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, provided to Staff no later than November 15.
4. A supplemental filing request would be submitted within 45-days of the end of a quarter, with any filing submitted after the 45-days denied by the Commission.
5. The Commission has 120-days in which to review and approve a supplemental funding 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.
6. An "affected party" should be defined as any company contributing to or receiving monies from the KUSF. Notification of a supplemental 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.

When the Commission adopted the supplemental KUSF support procedures, no competitive Eligible Telecommunications Carrier (ETC) received KUSF support. Today, six competitive

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<sup>6</sup> Docket No. 00-GIMT-842-GIT (Docket 842), Letter Dated February 21, 2000 From Sandy K. Reams, KCC, Regarding KUSF Support Supplemental Funding Requests for Purposes Described in K.S.A. 1998 Supp. 66-2008(e).

<sup>7</sup> Docket 842, May 25, 2000 Order Approving Procedures for Supplemental KUSF Funding.

ETCs - Sage Telecom, Inc., Nex-Tech, Inc.; H&B Cable, Nex-Tech Wireless, LLC; Epic Touch Co., and United Wireless Communications, Inc. - receive KUSF support. Wildflower Telecommunications, LLC<sup>8</sup> and Big River Telephone<sup>9</sup> are designated as ETCs for KUSF support purposes, but have not requested KUSF support. And, Staff has recommended that the Commission grant NE Colorado Cellular Inc. d/b/a Viaero Wireless' request for ETC designation for KUSF support purposes.<sup>10</sup>

In its February 26, 2010 memorandum in Docket No. 10-UWCC-349-KSF (Docket 349), Staff recommended that the Commission open a generic docket to address the supplemental KUSF support procedures.<sup>11</sup> First, Staff noted that it has proposed, and the Commission has adopted, numerous adjustments to a company's request for supplemental KUSF support. However, the adopted adjustments may not be incorporated into a subsequent request for supplemental KUSF support due to the timing of filing requests. For example, a company filing a request for supplemental KUSF funding support for the quarter-ended March 31 must submit the request no later than May 15 and an order from the Commission is due no later than September 12. If the company files a supplemental funding request for the quarter ending June 30, the filing must be submitted by August 14. Therefore, any adjustments to the March 31 data adopted by the Commission may not be reflected in the company's supplemental filing for the quarter ended June 30, resulting in Staff expending additional time and resources to incorporate the adjustments into its calculations for the June 30 quarter-end filing.

Next, Staff stated concerns related to the accuracy of a company's supplemental funding requests and suggested that ways to increase the accuracy of a company's filing be reviewed. This would include a review of options available to companies to use to map address locations. Most of the adjustments to a company's supplemental funding request filing are based on Staff selecting a sample of customer address and remapping the address location to the correct exchange and/or zone.

Staff's memorandum also raised the issue of whether the current filing frequency is appropriate. The current procedures for supplemental funding require a company to submit a request within 45-days after the end of the quarter to prevent significant delays between the period on which the request is based and when a company submits a request based on that time period. As discussed above, a company may not be able to incorporate Commission adopted adjustments in a request for supplemental KUSF support prior to filing a request for the next quarter's-end.

Finally, Staff suggested that the Commission consider the effective date for supplemental KUSF fund support payments. Currently, supplemental KUSF support payments are effective the first of the month following the quarter-end on which the company's request is based. In comparison, a rural LEC's KUSF support, determined in a company-specific audit or docket requesting additional KUSF support, is effective the first of the month following a Commission order.

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<sup>8</sup> Docket No. 08-WLDT-724-ETC, March 7, 2008 Order Granting Wildflower Application for ETC Eligible for KUSF support.

<sup>9</sup> Docket No. 09-BGRT-213-ETC, October 28, 2009 Order Designating Big River as an Eligible Telecommunications Carrier and Authorizing Big River to Provide Local Exchange and Exchange Access in Certain Rural Areas.

<sup>10</sup> Docket No. 09-NECZ-747-ETC, March 26, 2010 Staff Report.

<sup>11</sup> Docket 349, February 26, 2010 Notice of Filing Staff Memorandum, Staff Memorandum, p. 4.

Thus, Staff suggested it may be appropriate for all KUSF support adjustments to be effective the first of the month following a Commission order. This approach is also consistent with the Commission's determination in Docket No. 01-GIMT-140-GIT, in which payment for supplemental KUSF support was effective the first of the month following the Commission's order.<sup>12</sup> This approach would ensure all companies receiving supplemental KUSF support do so in a similar manner and avoid retroactive KUSF support payments.

In its March 5, 2010 order on Staff's memorandum in Docket 349, the Commission directed Staff to file a memorandum to open a generic proceeding to address whether the KUSF supplemental funding procedures should be modified.<sup>13</sup>

### **RECOMMENDATIONS:**

Staff suggests that the Commission open a generic proceeding to address whether the KUSF supplemental procedures adopted in 2000 should be modified. Staff suggests that, at a minimum, the generic proceeding address the following issues: (1) how to ensure Commission adopted adjustments in one filing are incorporated in the company's subsequent requests for supplemental KUSF support, (2) ways to increase the accuracy of a company's filing, including options for a company to map its customers' locations, (3) whether the current filing frequency is appropriate, and (4) the appropriate effective date for payment of supplemental KUSF support.

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<sup>12</sup> Docket No. 01-GIMT-140-GIT, November 7, 2000 Order Approving Supplemental Funding Requests by KanOkla Telephone Association, Inc. and Craw-Kan Telephone Coop., Inc.

<sup>13</sup> Docket 349, March 5, 2010 Order Granting Request of United Wireless for Supplemental Kansas Universal Service Fund Support as Adjusted by Staff, ¶ 9.

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Notice of Filing of Staff Memorandum was placed in the United States mail, postage prepaid, or hand-delivered this 16th day of April, 2010, to the following:

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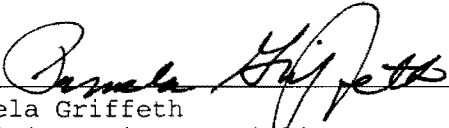
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