

May 21, 2025

State Corporation Commission

State of Kansas

1500 SW Arrowhead Rd

Topeka, KS 66604-4027

Re: Dialpad, Inc. Company-Specific Traffic Report

Docket No. 24-GIMT-229-GIT

Dear Sir or Madam:

Pursuant to K.S.A. 2006 Supp. 66-1220a, please accept the attached Percent Interstate Usage Study for Kansas as a public document.

Feel free to contact me if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Brett Reed", with a stylized flourish extending to the right.

Brett Reed

CFO, Interim

Dialpad, Inc.

NOTICE OF TRAFFIC STUDY UTILIZED BY

DIALPAD INCORPORATED

AFFIDAVIT OF BRETT REED

I, Brett Reed, being first duly sworn, depose and say:

I am the CEO, Interim of Dialpad Incorporated. My business address is 2700 Camino Ramon Suite 490, San Ramon, CA 94583. In this capacity, I am responsible for, *inter alia*, reporting and remittances relating to the Kansas Universal Service Fund ("KUSF") for Dialpad Inc.

**I. Introduction**

Dialpad, Inc. ("Dialpad" or "Company"), hereby submits this affirmation regarding its use of a company-specific traffic factor study to allocate its revenues between interstate and intrastate jurisdictions, for the purpose of complying with Federal and Kansas Universal Service Fund ("USF") contributions. Dialpad asserts that the methodology applied in the preparation of this study is consistent, reasonable, and complies with relevant Federal Communications Commission ("FCC") rules and Kansas regulatory requirements. This study will serve as the basis for allocation of Dialpad's revenue for both the Federal and Kansas USF contribution purposes, with a uniform application of the same methodology for both jurisdictions.

**II. Background**

Dialpad is a provider of voice services, which include both interstate and intrastate telecommunications. In compliance with USF contribution obligations, Dialpad is required to allocate its revenues between interstate and intrastate jurisdictions to accurately assess its contributions to both the Federal and Kansas USF. For this purpose, Dialpad has developed a company-specific traffic factor study designed to allocate its revenue between interstate and intrastate services based on actual traffic patterns, in accordance with the applicable rules and guidelines. The study resulted in allocating [REDACTED] % to represent intrastate and [REDACTED] % to represent interstate.

**III. Methodology**

Dialpad's traffic factor study uses an objective and reasonable methodology to determine the split between interstate and intrastate traffic. The study is based on an analysis of traffic data collected directly from the Company's systems, reflecting actual usage patterns of its customers. Specifically, the study incorporates:

- 1. Traffic Measurement:** The company collects data on call traffic volumes, including both interstate and intrastate calls, for a representative period. The data is sourced from the company's network logs and billing systems.
- 2. Proportional Allocation:** Based on the traffic measurement, Dialpad calculates the proportion of interstate to intrastate traffic, which is then used to allocate the total revenue between the two jurisdictions. This allocation reflects the actual usage patterns of the company's customers.

**3. Consistency in Methodology:** The same methodology is applied consistently for both Federal and Kansas USF purposes. The traffic factors derived from the study are used in determining the appropriate revenue allocations for both the Federal USF and Kansas USF contributions, ensuring uniformity and accuracy in compliance with both regulatory frameworks. Dialpad applies the KUSF percentage to its Kansas retail revenues to determine the amount it remits to the KUSF for the months of January to December 2024.

#### **IV. Compliance with Regulatory Requirements**

Dialpad affirms that the methodology used in the company-specific traffic factor study complies with the requirements of the FCC and the Kansas Corporation Commission ("KCC") for revenue allocation for USF contributions. In particular:

**Federal USF:** Dialpad has followed the principles set forth by the FCC for revenue allocation between interstate and intrastate jurisdictions, using a traffic study methodology that is representative of the company's actual traffic and service usage.

**Kansas USF:** Dialpad has applied the same traffic factor study to allocate revenue for Kansas-specific USF purposes, ensuring consistency with the allocation for federal purposes, and in compliance with Kansas state regulations for telecommunications service providers.

#### **V. Conclusion**

Dialpad's use of a company-specific traffic factor study to allocate its revenues between interstate and intrastate jurisdictions is in full compliance with both the FCC's and Kansas's rules governing USF contributions. The study methodology is sound, reasonable, and consistently applied for both Federal and Kansas USF purposes. Dialpad respectfully requests that the Commission recognize and accept this approach for the purposes of assessing its contributions to the Federal and Kansas Universal Service Funds.

  
Brett Reed

Please add notary here.

# CALIFORNIA JURAT

CERTIFICATE

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California }

County of Contra Costa }

Subscribed and sworn to (or affirmed) before me on this 21 day of May, 2025

by Brett Reed proved to me on the basis of

satisfactory evidence to be the person(s) who appeared before me.



Notary Public Signature



(Seal)

## OPTIONAL INFORMATION

DOCUMENT

SIGNER CAPACITY

(name or type of document)

(capacity claimed by the signer)

(number of pages)

(document date)

**NOTICE**  
THE NOTARY PUBLIC DOES NOT  
CERTIFY THE AUTHORIZED  
CAPACITY OF THE SIGNER



CERTIFICATE OF SERVICE

I hereby certify that on this 21th day of May, 2025, the above plead was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

KANSAS CORPORATION COMMISSION 1500 S.W. ARROWHEAD ROAD

TOPEKA, KS 66604

[kcc.publicaffairs@ks.gov](mailto:kcc.publicaffairs@ks.gov)

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