

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

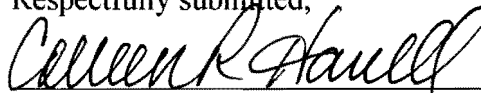
In the Matter of a Review of the Forward-)
Looking High-Cost Model Used to) Docket No. 11-GIMT- 420-GIT
Determine Cost-Based Kansas Universal)
Service Fund Support for Price Cap Carriers)
and Competitive Eligible)
Telecommunications Carriers Offering)
Service in Price Cap Carrier Study Areas.)

NOTICE OF FILING OF STAFF REPORT AND RECOMMENDATION

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) and, pursuant to the Commission's March 10, 2010 Order in Docket No. 08-GIMT-1023-GIT files its report and recommendation that the Commission undertake a review of the forward-looking high-cost model used to determine cost-based Kansas Universal Service Fund (KUSF) support for telecommunications carriers that have elected price cap regulation. This will also review the KUSF support for competitive eligible telecommunications carriers offering service in price cap carrier study areas.

WHEREFORE Staff requests the Commission consider its report and recommendation, issue an order opening a docket to undertake the recommended review, issue an order assessing costs against appropriate entities, develop a schedule for procedure to govern the Commission's review, and for such other and further relief as the Commission deems just and proper.

Respectfully submitted,



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REPORT AND RECOMMENDATION

To: Chairman Wright
Commissioner Harkins
Commissioner Loyd

From: Sandy Reams

Date: November 24, 2010

NOV 24 2010

RE: Proceeding to Review the Forward-Looking High-Cost Model Used to Determine the Cost-Based Kansas Universal Service Fund (KUSF) Support for Price Cap Carriers and Competitive Eligible Telecommunications Carriers (ETCs) Offering Service in Price Cap Carrier Study Areas.

BACKGROUND

On May 19, 2008, Sprint Communications Company L.P., Sprint Spectrum L.P., and Nextel West Corp. d/b/a Sprint (Sprint) submitted a Petition requesting the Commission investigate whether the United Telephone Companies of Kansas d/b/a CenturyLink's (CenturyLink) intrastate switched access charges should be reduced to parity with its interstate access charges, pursuant to K.S.A. 66-2005(c) (Sprint Petition).

The Commission opened Docket 1023¹ to address Sprint's Petition. Parties filed direct, rebuttal, and surrebuttal testimony. Technical hearings were held May 18 - 20, 2009. On March 10, 2010, the Commission issued an Order on Sprint's Petition.² The Commission stated that the Kansas Legislature granted it the discretion to balance various goals and that it had the authority to reduce CenturyLink's intrastate switched access rates to interstate levels, with the company recovering the related access revenue from the Kansas Universal Service Fund (KUSF) on a revenue-neutral basis.³ The Commission determined that since CenturyLink's access revenue recovery would occur on a revenue-neutral basis, it would be appropriate to review the KUSF pursuant to K.S.A. 2009 Supp. 66-2008(c) and determine whether the cost to provide universal service justified modifications to the KUSF.⁴

¹ *In the Matter of the Petition of Sprint Communications Company, L.P., Sprint Spectrum L.P., and Nextel West Corp. d/b/a Sprint to Conduct General Investigation into the Intrastate Access Charges of United Telephone Company of Kansas, United Telephone Company of Eastern Kansas, United Telephone Company of South Central Kansas, and United Telephone Company of Southeastern Kansas d/b/a Embarq*, Docket No. 08-GIMT-1023-GIT (Docket 1023).

² Docket 1023, Order Setting Embarq's Intrastate Access Rates to Parity and Providing for Rebalancing Through the KUSF (March 10, 2010 Order).

³ *Id.*, ¶ 232, 235.

⁴ *Id.*, ¶ 244.

The Commission directed Staff to open a docket for the purpose of reviewing the KUSF within six to nine months from the date of the Order. The Commission recognized that significant legal issues may need to be addressed, that it may be necessary for experts to participate in the docket, and that it will be a significant undertaking. The Commission further recognized that it is unlikely that the Federal Communications Commission (FCC) would have a new cost model available prior to this Commission opening the docket, which will make the review more difficult.

ANALYSIS

I. Federal Cost Model:

In 1997, the FCC adopted ten criteria to use for estimating the forward-looking economic costs of providing universal service in high-cost areas.⁵ The forward-looking costs would be recognized in a cost model that would estimate the cost to provide service to all of the businesses and households within a geographic region.⁶ The costs would reflect the most-efficient, least-cost technology that was being deployed to provide supported services.⁷ The FCC determined that all interested parties must be able to review the model, with all of the inputs, underlying data, formulae, computations, and software available and verifiable,⁸ and must be able to be examined and modified for critical assumptions and engineering principles.⁹

The FCC adopted the Hybrid Cost Proxy Model (HCPM) to determine the federal Universal Service Fund (USF) support available to price cap carriers,¹⁰ effective July 1, 2000. The FCC recognized that the establishment of a forward-looking cost model was a dynamic process and that the model would evolve to reflect changes, including technological changes;¹¹ however, the FCC has not updated the HCPM to reflect technology changes. Thus, the current HCPM model recognizes the forward-looking cost to deploy a circuit-switched, narrowband network to provide Plain Old Telephone Service (POTS). It does not recognize that wireless and/or interconnected Voice over Internet Protocol (VoIP) technologies may be the most-efficient, least-cost technologies available today, or the costs associated with such technologies.

Although the FCC has not updated the HCPM, it is currently undertaking the reform of intercarrier compensation, interstate/intrastate separations, and the federal USF, in conjunction with its implementation of the National Broadband Plan. On April 21, 2010, the FCC released a Notice of Inquiry and a Notice of Proposed Rulemaking (NOI/NPRM), which among other things, requested comment on whether the FCC should use a cost model to help determine universal service support levels in areas where there is no private sector business case to provide broadband and voice services.

⁵ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 8899, para. 224 (Universal Service First Report & Order).

⁶ *Id.*, para. 250 (criterion 6)

⁷ *Id.*, para. 250. (criterion 1).

⁸ *Id.* (criterion 8)

⁹ *Id.*, (criterion 9)

¹⁰ *Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High-Cost Support for Non-Rural LECs*, Tenth Report and Order, CC Docket Nos. 96-45, 97-160, 14 FCC Rcd 20156 (1998) (Tenth Report and Order).

¹¹ Fifth Report and Order, ¶13.

II. Kansas Cost Model:

On September 30, 1999, in Docket 326, the Commission adopted the FCC's HCPM for KUSF purposes for the carriers that elected price cap regulation, which are Southwestern Bell Telephone Company d/b/a AT&T (AT&T) and CenturyLink.¹² The Commission recognized that the FCC's cost model included over 1,400 input variables in an effort to recognize various state conditions, and that the parties to Docket 326 agreed to use those variables, with limited exceptions.¹³ Specifically, modifications to the HPCM model would reflect Kansas-specific conditions, but not company-specific conditions. This would limit the number of modifications while representing conditions that could affect all companies operating in Kansas, not just the incumbent local exchange carriers. The KUSF support available to AT&T, CenturyLink, and any designated Eligible Telecommunications Carrier (ETC) serving in AT&T's or CenturyLink's study areas is currently based on the KUSF cost model.

RECOMMENDATIONS

Staff recommends the Commission open a new docket to review the KUSF and the cost model for price cap carriers. Staff recommends the Commission address legal and policy issues prior to determining the specific cost model or inputs that should be used in the model.

A wide range of policy issues may exist; therefore, Staff recommends the Commission seek comment from parties to identify any policy or legal issues that they believe should be addressed by the Commission. Initial issues that may need to be considered include: 1) the level of participation of providers of alternative technologies, such as VoIP and wireless, in the market; 2) whether and how the National Broadband Plan and federal USF reform should be addressed in such a review of the KUSF cost model; 3) whether the Commission should review the definition of universal service for Kansas; and, 4) whether the Commission should phase out competitive ETC KUSF support, similar to the proposal to phase out federal competitive ETC support in the National Broadband Plan.

¹² *In the Matter of an Investigation Into the Kansas Universal Service Fund (KUSF) Mechanism for the Purpose of Modifying the KUSF and Establishing a Cost-Based Fund*, Docket No. 99-GIMT-326-GIT (Docket 326), Order No. 10: Adopting a Forward Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC's Cost Proxy Model (Order 10).

¹³ Docket 326, Order 16: Determining the Kansas-Specific Inputs to the FCC Cost-Proxy Model to Establish a Cost-Based Kansas Universal Service Fund (Order 16), p.3.

CERTIFICATE OF SERVICE

11-GIMT-420-GIT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Notice of Filing of Staff Report and Recommendation was placed in the United States mail, postage prepaid, or hand-delivered this 8th day of December, 2010, to the following:

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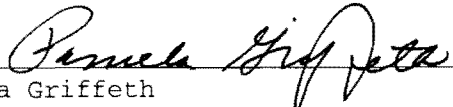
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