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July 2, 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&A Telephone Company, Inc., 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: Janet Bathurst

Encl.

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Chair Shari Feist Albrecht  
Commissioner Jay Scott Emmler  
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 General Manager and Vice President of S&A Telephone Company, Inc. 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&A Telephone Company to the statements made in this certification.

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

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by S&A Telephone Company 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

Janet Bathurst  
Printed/Typed Name

Executed on July 2, 2018

Email address: [jbathurst@satelephone.com](mailto:jbathurst@satelephone.com)

Company Name: S&A Telephone CompanyDATA YEAR: 2017

	LINE	REGULATED AMOUNT
<b>WORKING LOOPS</b>		
1. Total Loops	(060)	559
2. Category 1.3 Loops	(070)	556
<b>INVESTMENT</b>		
1. Plant Accounts		
a. Acct 2001	(160) \$	8,463,578
2. Selected Plant Accounts		
a. Acct 2210	(230)	226,166
b. Acct 2220	(235)	0
c. Acct 2230	(240)	
d. Total Central Office Equip	(245) \$	1,984,448
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410	(255)	
<b>AMORTIZABLE TANGIBLE ASSETS</b>		
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
<b>PART 36 - COST STUDY DATA</b>		
1. Cost Study Avg C&WF Acct 2410	(700)	6,034,225 Year End Balances
2. Cost Study Avg C&WF Cat 1	(710)	5,508,249 Year End Balances
3. C&WF CAT 1 Factor		0.912835
4. COE CAT 4.13 Factor		0.456012
5. Switching Factor		1.000000

Company Name: S&A Telephone Company

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)		CONFIDENTIAL & PROPRIETARY
b. Total Central Office Equip	(245)		CONFIDENTIAL & PROPRIETARY
c. Acct 2410 (Total)	(255)		CONFIDENTIAL & PROPRIETARY
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)	33,670	
e. Acct 6120 (benefits)	(355)	679	
f. Acct 6120 (rents)	(360)	0	
g. Acct 6210	(365)	17,343	
h. Acct 6210 (benefits)	(370)	3,394	
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)	132,689	
n. Acct 6230 (benefits)	(400)	18,316	
o. Acct 6230 (rents)	(405)	0	
p. (sum of lines 365+380+395)	(410)	150,032	
q. Acct 6410	(430)	86,234	
r. Acct 6410 (benefits)	(435)	24,487	
s. Acct 6410 (rents)	(440)	450	
t. Total Expenses Accts. 6110 - 6410	(445)	\$ 269,936	
3. Expenses - Plant Non Specific Exp			
a. Acct 6530	(450)	143,779	
b. Acct 6530 (benefits)	(455)	39,260	
4. Depreciation & Amortization Exp			
a. Acct 6560 (#2210)	(510)	25,627	
b. Acct 6560 (#2220)	(515)	0	
c. Acct 6560 (#2230)	(520)	229,849	
d. Acct 6560 (#2210-2230)	(525)	\$ 255,476	
e. Acct 6560 (#2410)	(530)	126,260	
5. Corporate Operating Expenses			
a. Acct 6710	(535)	71,980	
b. Acct 6710 (benefits)	(540)	0	
c. Acct 6720	(550)	325,901	
d. Acct 6720 (benefits)	(555)	25,892	
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ 397,881	
6. Other Expenses and Revenues			
a. Benefits Portion	(600)	117,742	
b. Rents Portion	(610)	450	
Sum of All Expenses (Excluding Depreciation)		\$ 811,596	
7. Taxes			
a. Acct 7200	(650)	294,053	



Company Name: <u>S&amp;A Telephone Company</u>		
DATA YEAR: <b>2017</b>		
Test for use of FUSF & KUSF		
CAPITAL:		
1. Category 1 C&WF		46,718
2. Category 4.13 COE and Switching		36,587
MAINTENANCE:		
3. CWF - MAINT. EXP.		55,954
4. COE - MAINT. SW		13,949
5. COE - MAINT-OP SYSTEM		-
6. COE - MAINT. - TRANS.		58,864
7. CWF - NETWORK SUPPORT		0
8. COE - NETWORK SUPPORT		0
9. CWF GENERAL SUPPORT		21,471
10. COE GENERAL SUPPORT		4,409
20. CWF NETWORK OPERATION		68,023
21. COE NETWORK OPERATION		13,968
22. CWF EXEC. & PLANNING		46,846
23. COE EXEC. & PLANNING		9,620
24. CWF GENERAL ADMIN.		195,251
25. COE GENERAL ADMIN.		40,094
26. CWF OPERATING TAXES		191,375
27. COE OPERATING TAXES		39,298
28. CWF BENEFITS - TTL OPER EXP		76,629
29. COE BENEFITS - TTL OPER EXP		15,735
30. CWF RENTS - TTL OPER EXP		293
31. COE RENTS - TTL OPER EXP		60

<b>Company Name:</b> <u>S&amp;A Telephone Company</u>	
<b>DATA YEAR:</b> <u>2017</u>	
A. Total Cash Expenditures Associated with USF	935,144.64
<b>B. Certified Federal USF Receipts:</b>	
B1. High Cost Loop Support / Frozen High Cost Support	-
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	833,750
B7. CAF ICC (§§ 51.915, 51.917, 51.304)	68,034
<b>B8. Total Certified Federal USF Receipts</b>	<b>\$ 901,784</b>
C. KUSF Receipts	346,184
D. Total FUSF and KUSF Receipts	1,247,968
E. Do Expenditures Exceed <b>FUSF</b> Receipts?	<b>Yes</b>
<b>Amount Expenditures Exceed Certified FUSF</b> (negative number means FUSF exceeds Expenditures)	\$ 33,360.24 [A - B8]
F. Do Expenditures Exceed <b>FUSF &amp; KUSF</b> Receipts?	<b>No</b>
Amount Expenditures Exceed Certified FUSF and/or KUSF (negative number means FUSF/KUSF exceeds Expenditures)	(312,823) [A - D]
<b>Please provide the following information:</b>	
Contact: <u>Janet Bathurst</u>	
Title: <u>General Manager &amp; Vice President</u>	
Phone No.: <u>620-528-3655</u>	
E-Mail: <u>jbathurst@satelephone.com</u>	

## Narrative Report for New Investments

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

Company Name: S&A Telephone Company, Inc.

Data Year: 2017 **CONFIDENTIAL & PROPRIETARY**

					Amount Used in the USF Supported Areas
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	
A	B	C	D	E	F= C x D
Subtotal					
Total					

NOTES:

**This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255).**

Contact: Janet Bathurst

Phone No.: 620.528.3223

Title: General Manager & VP

E-Mail: [jbathurst@satelephone.com](mailto:jbathurst@satelephone.com)





Subtotal				
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Annual 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
<u>None to report</u>					

(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 you attempted to provide service to those potential customers.

None to report

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

None to report

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 General Manager and Vice President of the S&A Telephone Company, Inc. In this capacity, I am in a position of authority to certify whether the Company is complying with required quality of service standards. I am binding S&A Telephone Company, Inc. to the statements made in this certification.

2. By this affidavit, I certify that S&A Telephone Company, Inc. 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 July 2, 2018.



Signature

Janet Bathurst

Printed/Typed Name

5. An ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2). All ETCs must complete the following:

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**

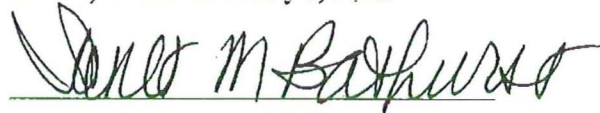
**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is General Manager and Vice President of the S&A Telephone Company, Inc. In this capacity, I am in a position of authority to certify whether the Company is able to function in an emergency. I am binding S&A Telephone Company, Inc. to the statements made in this certification.

2. By this affidavit, I certify that S&A Telephone Company, Inc. 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 July 2, 2018.



Signature

Janet Bathurst

Printed / Typed Name

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

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
The Emporia Gazette	Newspaper	Lyon County (Allen & Admire Exchange)	01/06/17 02/10/17 03/09/17 05/05/17
KVOE	Radio	Lyon & Osage Counties (Entire Counties)	07/07/17 11/17/17
Mytown Media	Radio	Lyon County (Allen & Admire Exchange)	01/06/17 02/10/17 03/09/17 04/07/17 05/05/17 06/09/17
The Wave	Radio	Lyon County (Allen & Admire Exchange)	11/17/17



**18-GIMT-394-GIT**  
**Attachment 6**

All-American Publishing	Calendar	Lyon County (Allen & Admire Exchange)	Year Round
Law Enforcement Support L.L.C.	Calendar	Lyon County (Allen & Admire Exchange)	Year Round
The Osage County Herald – Chronicle	Newspaper	Osage County (Scranton Exchange)	02/03/17 05/19/17 09/22/17 10/13/17 11/17/17
The Flint Hills Shopper	Newspaper	Lyon & Osage Counties (Entire Exchange)	02/10/17 09/15/17 11/10/17
Twin Lakes Water Festival	Brochures & T-shirts	Lyon County (Allen & Admire Exchange)	05/12/17
NLCYA	Poster	Lyon & Osage Counties (Entire Exchange)	09/28/17
Farm & Home Publishers	Lyon County Land Directory	Lyon County (Allen & Admire Exchange)	Year Round
Admire Community Pride	Newsletter	Lyon County (Admire Exchange)	Year Round
National Directory Assistance	Directories	Lyon & Osage Counties (Entire Exchange)	Year Round
HIBU	Directories	Lyon & Osage Counties (Entire Exchange)	Year Round
Osage County Fair Association	Brochures	Osage County (Scranton Exchange)	03/09/17
City of Scranton	Poster	Osage County (Scranton Exchange)	09/28/17
Flint Hills Beef Fest	Brochures, Website, Placemats	Lyon & Osage Counties (Entire Exchange)	07/21/17
Royal Publishing	Brochures	Lyon & Osage Counties (Entire Exchange)	01/06/17 02/03/17 05/19/17
Burlingame After Prom	Poster	Osage County (Scranton Exchange)	04/21/17
Santa Fe Trail After Prom	Newspaper	Osage County (Scranton Exchange)	04/14/17
SFTAC PTO	Poster	Osage County (Scranton Exchange)	03/03/17
NHHS Booster Club	Banner	Lyon County (Allen & Admire Exchange)	Year Round
NHHS After Prom	Poster	Lyon County (Allen & Admire Exchange)	09/28/17
Hugh O'Brian Youth Leadership	Brochures	Lyon County (Allen & Admire Exchange)	04/14/17
NHHS Cheer Squad	Poster	Lyon County (Allen & Admire Exchange)	08/11/17
Lyon County Fair Sponsorship	Fair Program	Lyon County (Allen & Admire Exchange)	08/25/17
American Cancer Society	Relay for Life Program	Lyon & Osage Counties (Entire Exchange)	06/09/17

**18-GIMT-394-GIT**  
**Attachment 6**