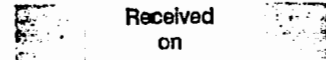




GVNW CONSULTING, INC.

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TEL. 719.594.5800  
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August 3, 2012



AUG 06 2012

by  
State Corporation Commission  
of Kansas

Ms. Patrice Petersen-Klein, Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

RE: Docket No. 12-ORIZ-021-KSF, Kansas #15 Limited Partnership

Dear Ms. Petersen-Klein:

**Executive Summary**

On May 30, 2012, the Kansas Corporation Commission (Commission) issued an Order adopting GVNW Consulting, Inc.'s (GVNW) audit report and directing Kansas #15 Limited Partnership (Kansas #15 or Company) to issue one-time billing credit refunds, totaling \$114,487.90, to the Company's current customers. Kansas #15 was further directed to provide an affidavit, signed by an officer of the Company, attesting to the completion of the refund.

Kansas #15 provided the required affidavit and copies of customer bills to substantiate that it issued \$114,725.16 in total refunds via one-time bill credits to existing Kansas customers. GVNW recommends that Docket No. 12-ORIZ-021-KSF be closed.

**Background**

In Order No. 1, the Commission ordered GVNW to commence an audit of Kansas #15. On April 12, 2012, GVNW submitted an audit report, noting five findings and recommendations, including that Kansas #15 had over-reported and overpaid its assessments to the Kansas Universal Service Fund (KUSF). Kansas #15 had also over-collected its assessment from customers; therefore, GVNW recommended that the KUSF issue a refund to Kansas #15 and that the Company issue refunds totaling \$114,487.90 to its Kansas customers.

On May 30, 2012, the Commission issued an Order that: 1) adopted GVNW's audit report recommendations; 2) directed the KUSF Administrator to make a one-time refund to Kansas #15; 3) directed Kansas #15 to issue one-time billing credits in the amount of \$114,487.90; and 4) upon completion of the refund, file an affidavit of a Company

official attesting to the refund. The KUSF Administrator, on June 21, 2012,<sup>1</sup> issued the one-time refund to Kansas #15, as, directed by the Commission.

On July 30, 2012, Kansas #15 submitted the required affidavit to attest to the refund (See Attachment A) and copies of actual customer bills that reflect the refund.

**Recommendation**

As a result of Kansas #15's compliance with the recommendations of the audit report, GVNW recommends that the Commission close Docket No. 12-ORIZ-021-KSF.

Sincerely,



David Winter  
Senior Consultant

Encl.

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<sup>1</sup> The KUSF Administrator initiated the refund on June 21, 2012 which was disbursed on June 22<sup>nd</sup>. Due to the processing time and the subsequent weekend, the transaction was not recorded by Kansas #15 until June 25<sup>th</sup>.

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

**AFFIDAVIT OF LJUBICA PETRICH**

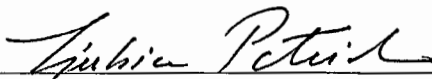
STATE OF ILLINOIS

COUNTY OF COOK

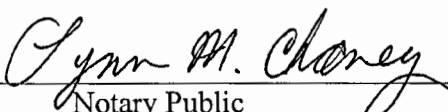
Ljubica Petrich, of being of lawful age, on her oath states the following:

In Docket No. 12-ORIZ-021-KSF, the Kansas Corporation Commission authorized GVNW, Inc. to pay out of the Kansas Universal Service Fund to Kansas #15 Limited Partnership a total of \$121,131.52 of which \$114,487.90 was ordered to be refunded to its current customers on an equal bill credit basis. On June 25, 2012 GVNW, Inc. made payment to Kansas #15 Limited Partnership who issued a total refund of \$114,725.16 to affected customers based on an equal bill credit basis. The credits were applied to customer bills on July 20, 2012. As the total refund amount was slightly higher than the amount ordered to be refunded, the difference of \$237.26 was self funded by Kansas #15 Limited Partnership.

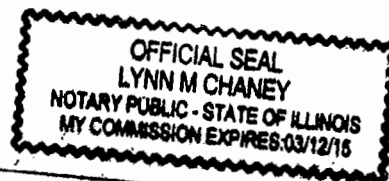
I am the Vice President of USCOC of Nebraska/Kansas Inc., general partner of Kansas #15 Limited Partnership and am authorized to make this statement.

  
\_\_\_\_\_  
Ljubica Petrich

Subscribed and sworn to before me this 25<sup>th</sup> day of July 2012.

  
\_\_\_\_\_  
Notary Public

My commission expires 03/12/15



## CERTIFICATE OF SERVICE

I hereby certify that on this 3<sup>rd</sup> day August 2012, the original and seven (7) copies of the above and foregoing were sent via U.S. Mail, first class postage prepaid to:

Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
Topeka, KS 66604

And an electronic copy to:

Stephanie Cassioppi, Legal And Regulatory Affairs  
Kansas #15 Limited Partnership  
8410 Bryn MAWR, Ste. 700  
Chicago, Il 60631  
Email: [Stephanie.Cassioppi@uscellular.com](mailto:Stephanie.Cassioppi@uscellular.com)

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Kaylene Laplante  
Sales & Use Tax Lead  
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8410 W. Bryan Mawr Ave.  
Chicago, IL 60631  
Email: [Kaylene.Laplante@uscellular.com](mailto:Kaylene.Laplante@uscellular.com)



David G. Winter