

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation to)
Review the Kansas Universal Service Fund)
Cap for the United Telephone Companies of) Docket No. 18-UTDT-356-GIT
Kansas d/b/a CenturyLink Pursuant to K.S.A.)
66-2008(d)(2))

NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION

The Staff of the Kansas Corporation Commission (Staff and Commission, respectively), having reviewed the comments and reply comments submitted in this matter, hereby files its Report and Recommendation (R&R). Staff recommends that the Commission take no action at this time with respect to the capped amount of Kansas Universal Service Fund (KUSF) support available for each local exchange carrier operating under price-cap regulation pursuant to K.S.A. 66-2008(d)(2).

WHEREFORE, Staff submits its R&R dated May 22, 2018, attached hereto, for Commission consideration.

Respectfully Submitted,



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COUNTY OF SHAWNEE)


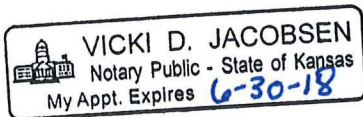
VERIFICATION

Michael Neeley, 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's Report and Recommendation* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Michael Neeley # 25027
Kansas Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 23rd day of May, 2018.



Notary Public

My Appointment Expires: June 30, 2018

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REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Chairman Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Dwight Keen

FROM: Sandy Reams, Assistant Chief of Telecommunications
Christine Aarnes, Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: May 22, 2018

SUBJECT: **Docket No. 18-GIMT-356-GIT**
In the Matter of a General Investigation to Review the Kansas Universal Service Fund Cap for the United Telephone Companies of Kansas d/b/a CenturyLink Pursuant to K.S.A. 66-2008(d)(2).

EXECUTIVE SUMMARY:

The Kansas Corporation Commission (Commission)'s Order, dated February 27, 2018, solicited comments on its review of the cap on a price cap carrier's annual Kansas Universal Service Fund (KUSF) support distributions to determine if a lesser amount is appropriate for distributions after March 1, 2019, as required by K.S.A. 66-2008(d)(2) (Opening Order). United Telephone Company of Kansas; United Telephone Company of Eastern Kansas; United Telephone Company of Southcentral Kansas; and Embark Missouri, Inc. d/b/a CenturyLink (CenturyLink) is the only price cap carrier in Kansas. Staff was directed to file a Report and Recommendation (R&R) based on the initial and reply comments by May 25th. Replies to Staff's R&R are due June 15, 2018.

Staff believes the Commission has the authority to review, but not modify, the statutory cap and determine if a lesser amount is appropriate for disbursements after March 1, 2019. For purposes of this review, Staff believes the current KUSF cost model meets the criteria set forth in K.S.A. 66-2008(d)(2). Staff suggests the current cap is appropriate for KUSF distributions to CenturyLink after March 1, 2019, and recommends that the Commission take no action at this time.

BACKGROUND:

K.S.A. 66-2008(d)(2) requires that the Commission:

undertake a review of the capped amount of KUSF support available for each local exchange carrier operating under price cap regulation that receives such

support...and determine if a lesser amount is appropriate for KUSF distributions after March 1, 2019. Reviews of such carriers shall be based on the forward-looking costs of providing basic voice service, using inputs that reflect the actual geography being served and that reflect the scale and scope of the local exchange carrier providing basic local voice service within each exchange.

Staff's Report and Recommendation (R&R), dated February 13, 2018 (February R&R), recommended that the Commission open this Docket to address the requirement in K.S.A. 66-2008(d)(2) for the Commission to review the cap on CenturyLink's annual KUSF support and determine if a lesser amount is appropriate for distributions after March 1, 2019. Staff also recommended that the Commission seek comments and reply comments from the telecommunications industry on four questions identified by Staff and any related issues raised by the parties. Staff stated it would submit another R&R to include its final recommendations based on the comments.

The Commission's Opening Order solicited comments, directed participating parties to file Entries of Appearance, and established a Procedural Schedule. Comments were due March 30, 2018; reply comments were due April 20, 2018; and Staff's R&R is due May 25th. Responses to Staff's R&R are due June 15, 2018.

Comments were submitted by Sprint Communications Company L.P.; Sprint Spectrum L.P. d/b/a Sprint PCS; Nextel West Corp. d/b/a Nextel; NPCR, Inc. d/b/a Nextel Partners; and Virgin Mobile USA, LLP d/b/a Virgin Mobile (collectively, Sprint)¹ and CenturyLink.² Reply comments were filed by CenturyLink.³

ANALYSIS

Staff's February R&R identified the following questions, on which Sprint and CenturyLink submitted comments:

- 1. Is the Commission to review the amount of the annual cap on CenturyLink's annual KUSF support as provided in K.S.A. 66-2008(c)(1) or is the Commission to review the amount of KUSF support annually disbursed to CenturyLink? What factors should the Commission consider in its review?**

A. Background

In its February R&R, Staff suggested that the Commission review the annual KUSF support disbursed to CenturyLink in relation to the \$11.4 million cap, as well as the annual KUSF support cap.⁴ Staff explained that CenturyLink's annual KUSF support disbursements have been less than the \$11.4 million cap, with the exception of one year.⁵ Staff also explained that K.S.A. 66-2008(c)(3) requires CenturyLink's annual KUSF support to "be reduced by any funding received

¹ Initial Comments of Sprint (Sprint Comments).

² CenturyLink's Initial Comments (CenturyLink Comments).

³ CenturyLink's Reply Comments (CenturyLink Reply).

⁴ February R&R, p. 4.

⁵ Id., p. 5, Table 1.

by such carrier from the federal communication commission's connect America fund II for the same household, if feasible, or for the same census block.” Staff, therefore, recommended that the Commission’s review consider: (1) the number of lines that CenturyLink receives KUSF support for has declined; (2) the intrastate access revenue CenturyLink recovers from the KUSF has declined;⁶ and (3) the period for which the Company will receive CAF II support is unknown.⁷

B. Comments

CenturyLink stated the Commission is to review the amount of the cap itself and determine if it should be reduced for KUSF support distributions to the Company after March 1, 2019.⁸ CenturyLink also stated that the statute requires the Commission to review the cap only if its annual KUSF support distribution equals the cap.⁹ CenturyLink opined that, since its annual KUSF support disbursements are less than the \$11.4 million cap and is expected to be \$8.1 million for the current year, the Commission lacks authority to review anything further.¹⁰ CenturyLink, therefore, suggested that the Commission consider the following factors during its review:¹¹ (1) the Company’s annual KUSF support in relation to the cap; (2) the decline in the Company’s annual KUSF support; (3) the impact CAF II support has on its annual KUSF support; (4) the forward-looking costs to provide basic service based on inputs to reflect inputs and variables for CenturyLink; and (5) the Company’s Carrier of Last Resort (COLR) obligations, claiming a disconnect exists between its COLR obligation to build and maintain its network for every household and receiving KUSF providing support for only its current customers.¹²

Sprint stated K.S.A. 66-2008(d)(2) does not require the Commission to review the actual amount of the cap.¹³ Instead, Sprint suggested the Commission is to review the amount of the annual KUSF support disbursed to CenturyLink to ensure it is less than the cap. Sprint stated the term “capped” describes the maximum KUSF support to be disbursed or “available” to CenturyLink.¹⁴ In other words, Sprint believes the referenced language applies to the annual KUSF support disbursement and that the disbursement can be less than the cap. Finally, Sprint supported the Commission’s consideration of other factors; mainly that the number of subscribers relying only on landline services continues to decline.¹⁵

In its Reply Comments, CenturyLink stated that Sprint’s position is inconsistent with statutory interpretation and construction since the term “capped” serves no purpose in describing the annual KUSF support available to the Company.¹⁶

⁶ Order Setting Embarq’s Intrastate Access Rates to Parity and Providing for Rebalancing Through the KUSF, Docket No. 08-GIMT-1023-GIT, March 10, 2010, and Order on Second Petition for Reconsideration, June 4, 2010 (March 2010 and June 2010 Order, respectively).

⁷ Ibid.

⁸ CenturyLink Comments, ¶ 1.

⁹ Id.

¹⁰ Id.

¹¹ Ibid., ¶ 2 - 3.

¹² Ibid., ¶ 3.

¹³ Sprint Comments, ¶ 3 - 4.

¹⁴ Ibid., ¶ 3.

¹⁵ Ibid., ¶ 5.

¹⁶ CenturyLink Reply, ¶ 1.

C. Analysis

Sprint and CenturyLink do not agree on whether K.S.A. 66-2008(d)(2) requires the Commission to review the \$11.4 million cap itself or the annual KUSF support available and disbursed to CenturyLink. CenturyLink interprets K.S.A. 66-2008(c)(1) as the maximum amount of its annual KUSF support disbursements and interprets K.S.A. 66-2008(d)(2) to require the Commission to review the amount of the cap on those disbursements. In contrast, Sprint interprets K.S.A. 66-2008(d)(2) to require the Commission to review CenturyLink's annual KUSF support disbursement to determine if a lower amount should be disbursed after March 1, 2019. Sprint's interpretation does not appear to be reasonable as it results in a redundant requirement in the two statutes.

Staff agrees: (1) the Legislature, not the Commission, has the authority to change the amount of the cap; and (2) the Commission's review should consider the historical decline in landline subscribership and the resulting impact to CenturyLink's KUSF support. Staff also agrees that, pursuant to K.S.A. 66-2008(c)(3), CenturyLink's annual KUSF support must be offset by its CAF II support.

CenturyLink will receive CAF II support for the 2015 through 2020 calendar years.¹⁷ Based on the true-up mechanism adopted by the Commission, the final CAF II support true-up to the Company's KUSF support will occur in 2021.¹⁸ CenturyLink is eligible to participate in the FCC's CAF II auctions, in which the successful bidder will receive CAF II support for broadband deployment in areas that do not currently qualify for such support. This means if CenturyLink is the successful bidder, it will receive CAF II support for an additional ten years.¹⁹ Alternatively, if the Company is not the successful bidder, it may qualify to receive CAF II support for an additional year. This means CenturyLink may receive CAF II support in 2021 or even through 2031 and, pursuant to K.S.A. 66-2008(c)(3), CAF II support must be used to reduce CenturyLink's annual KUSF support.

- 2. K.S.A. 66-2008(c)(3) requires that CenturyLink "shall receive" the same monthly KUSF support per line as that established in the April 2000 Notice. K.S.A. 66-2008(d)(2) requires the Commission's review to be based on the "forward-looking costs of providing basic voice service" using inputs that reflect the geography, scale, and scope of the LEC providing basic local voice service within each exchange. How should these requirements be interpreted?**

A. Background

The Commission adopted the FCC's Hybrid Cost Proxy Model (HCPM) for KUSF support purposes for price cap regulated carriers, with modifications to reflect Kansas-specific conditions.²⁰ The KUSF cost model has been used to calculate the annual KUSF support for

¹⁷ See *Connect America Fund et. al.*, Report and Order, rel. Dec. 18, 2014, ¶ 32 (CAF II Order).

¹⁸ Order Adopting Staff's Report and Recommendation, Ordering ¶ A, (Oct. 11, 2016), Docket 511 (Oct. 2016 Order).

¹⁹ CAF II Order, ¶ 31-32.

²⁰ See Order 10: Adopting a Forward Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC's Proxy Cost Model, Docket No. 99-GIMT-326-GIT (99-326), Sept. 30, 1999 (Order 10); and

Southwestern Bell Telephone Company d/b/a AT&T (AT&T) and CenturyLink²¹ since March 1, 2000. The KUSF cost model is based on forward-looking costs to reflect the costs to deploy an efficient, least cost-network, at the time the cost model was adopted.²²

In other words, the monthly, per line KUSF support available to CenturyLink offsets the costs to provide Plain Old Telephone Service (POTS) via a circuit-switched, narrowband network; not a network based on today's costs or technologies (e.g. wireless, Internet Protocol, etc.). The KUSF cost model provides KUSF support at a wire center level, generally an exchange, and targets support to two zones within a wire center.²³ The first zone covers, in general, locations within the city limits and the second zone generally covers locations outside of the city limits.²⁴ The KUSF cost model reflects an average forward-looking monthly cost of \$29.16 per line. The Commission adopted a 125% cost benchmark, meaning that when the cost to provide service in a wire center zone exceeds \$36.45 per month, KUSF support is provided. The monthly KUSF support, ranging from \$0.15 to \$243.23 per line, dependent upon the wire center and zone location, is identified in the April 2000 Notice cited in K.S.A. 66-2008(c)(3).

B. Comments

CenturyLink argued the statute requires the Commission's review of the capped amount to be based on the forward-looking costs to provide basic voice service and the inputs are required to be CenturyLink-specific. CenturyLink also stated the statute requires it to receive the per line KUSF support amounts identified in the April 2000 Notice, reduced by its CAF II support and that a statutory change is needed to modify either element.²⁵

Sprint did not address K.S.A. 66-2008(c)(3); instead, the Company focused on K.S.A. 66-2008(d)(2). Sprint stated the Commission must base its review on forward-looking costs using inputs that reflect the actual geography served and the scale and scope of CenturyLink to provide basic local voice service in an exchange.²⁶ Sprint urged the Commission to update specific inputs in the KUSF cost model to ensure statutory compliance.

CenturyLink responded by stating that Sprint's failure to address K.S.A. 66-2008(c)(3) means it did not harmonize K.S.A. 66-2008(c)(3) and K.S.A. 66-2008(d)(2).²⁷ CenturyLink opined its analysis harmonizes the statutes to provide the Commission with the authority to review the cap and determine if a lower amount is appropriate, and the statutes do not authorize the Commission

Order 16: Determining the Kansas-Specific Inputs to the FCC Cost Proxy Model to Establish a Cost-Based Kansas Universal Service Fund, Docket 99-326, Dec. 29, 1999 (Order 16).

²¹ CenturyLink operated as part of the Sprint companies when the KUSF cost model was adopted, therefore, Orders and filings refer to Sprint instead of CenturyLink.

²² See Order 10, Order 16.

²³ Order 10, ¶ 56.

²⁴ Id., ¶ 57. See also Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions, Feb. 14, 2000, (Order 6), Docket 00-GIMT-236-GIT (Docket 00-236), in which the Commission adopted the city limits as the delineation point for CenturyLink's United of Eastern Kansas and United of South Central Kansas study areas.

²⁵ CenturyLink Comments, ¶ 4.

²⁶ Sprint Comments, ¶ 6.

²⁷ CenturyLink Reply, ¶ 3.

to modify the elements set forth in K.S.A. 66-2008(c)(3). CenturyLink concluded that the Commission can make findings and submit them to the Legislature.

C. Analysis

Staff agrees that, when reading K.S.A. 66-2008(c)(3) and K.S.A. 66-2008(d)(2) together, the Company's KUSF support must be based on the monthly per line KUSF support identified in the April 2000 Notice, with such support adjusted for the CAF II support for each household. Staff also agrees the Commission is required to base its review on the forward-looking costs to provide basic voice service using inputs that reflect the geography of each exchange served and the scale and scope of providing service within each exchange.

3. If K.S.A. 66-2008(d)(2) requires the forward-looking costs to provide basic voice service in each exchange to be based on inputs that reflect the geography served, and scale and scope to provide the service, what KUSF cost model inputs should be modified?

A. Background

In its February R&R, Staff recommended that the Commission request comments on whether any KUSF cost model inputs should be modified. Staff also recommended that if any inputs were modified, the Commission limit modification to the following Kansas-specific inputs: (1) outside plant factor/transport; (2) cost benchmark; (3) access lines; (4) cost of capital; and (5) income and property taxes.²⁸

B. Comments

Sprint recommended that the Commission's review consider that fewer consumers rely on landline services.²⁹ Sprint further recommended that the corporate tax rate and cost of capital inputs be reduced and the cost benchmark increased.³⁰

CenturyLink stated the statute does not reference a cost model and only requires the Commission's review to be based on the forward-looking costs to provide basic voice service³¹ using inputs for CenturyLink. CenturyLink continued by stating the KUSF cost model and the HCPM are outdated, with neither able to be run by the Company.³² CenturyLink suggested the Commission consider a more current cost model, consistent with the FCC's approach for CAF II support,³³ and proposed using its own cost model.³⁴ CenturyLink recommended that, due to the age of the KUSF cost model, the following inputs need to be modified: (1) labor and material; (2) utilization factors;

²⁸ Staff's February R&R explained that CenturyLink is required to accrue its savings arising from the Tax Cuts and Jobs Act (TCJA) in a deferred revenue account, effective January 2018, subject to the Commission's review in Docket No. 18-GIMX-248-GIV. See Order Opening General Investigation and Issuing Accounting Authority Order Regarding Federal Tax Reform, Jan. 18, 2018.

²⁹ Sprint Comments, ¶ 5.

³⁰ Id., ¶ 6.

³¹ CenturyLink Comments, ¶ 7.

³² Ibid.

³³ Id., ¶ 8.

³⁴ Ibid.

(3) plant mix factors; and (4) expense factors.³⁵ CenturyLink, however, stated that since its annual KUSF support, absent the CAF II support offset, is less than the cap, and selection of a new cost model could result in the Company receiving more KUSF support.

C. Analysis

The purpose of the Commission's review is simple - review the cap on CenturyLink's annual KUSF support disbursements and determine if a lower amount is appropriate for distributions after March 1, 2019. The review must be based on the forward-looking costs to provide *basic voice service*. The Commission does not have authority to change the amount of the annual cap or the monthly per line KUSF support identified in the April 2000 Notice.

Ideally, Staff would recommend changing inputs to the KUSF cost model to reflect more current inputs, but it does not appear that it is possible to do so at this time. The HCPM was last updated in 2009 to run on the Windows XP operating system;³⁶ a system that neither CenturyLink nor Staff can run at this time as vendor support and security updates for Windows XP were discontinued in 2014. Staff has worked with the Commission's Information Technology Division, but efforts to run the model have been unsuccessful. Nonetheless, for purposes of this review, Staff believes the current KUSF cost model - even without modifications - is sufficient.

The CAF II model, which supports broadband, is not appropriate for this review because K.S.A. 66-2008(d)(2) requires the review to be based on forward-looking costs of providing *basic voice service*. The CAF II model also determines support at the census block level; not the exchange level. With regard to CenturyLink's proposal to use its cost model, the model has not been filed with the Commission nor has any party had an opportunity to review the model or suggest modifications. Thus, Staff does not know if it is based on the forward looking costs to provide *basic voice service* or something else or if the inputs reflect forward-looking and not historical costs. The process to review, modify, and adopt a new cost model for KUSF support purposes would involve significant time and resources for all parties, including Staff. Furthermore, due to the complexities of a cost model, it is likely Staff would need to hire a consultant to assist with its review of the proposed cost model.

Staff suggests that, instead, the Commission base its review on the current KUSF cost model since it is based on forward-looking costs using inputs to reflect the scale and scope to provide basic voice service in the geography of each exchange, in accordance with the statute. While CenturyLink and Sprint stated the inputs are outdated, neither claimed the Commission cannot rely on the current KUSF cost model for its review. Furthermore, this approach does not require additional resources to develop a new cost model for the Commission's simple task of determining whether the \$11.4 million cap remains appropriate. Because the Commission's review is limited to determining whether the current cap amount is appropriate and not to change CenturyLink's support or cap amount, Staff doesn't believe it would be cost beneficial to adopt a new model or to hire a consultant to review CenturyLink's proposed model (assuming it meets the statutory criteria).

³⁵ Id., ¶ 9.

³⁶ The HCPM was updated in 2009 to operate on Microsoft Windows XP, SP2 or greater; and Microsoft Office Suite 2003, SP3 or greater.

Furthermore, several updates are included in the determination of CenturyLink's annual KUSF support. The number of access lines is updated to reflect those the Company serves as of September 30th of each year. As the number of landline subscribers has declined, so has the annual KUSF support available to CenturyLink. Staff notes this annual update addresses Sprint's recommendation that the Commission consider that fewer subscribers rely on landline services. Next, the CAF II support CenturyLink receives for each household, as applicable, is trued-up to reflect the applicable KUSF support reduction. Lastly, the intrastate access revenue the Company is authorized to recover from the KUSF is also subject to an annual true-up.³⁷ These true-up processes have resulted in CenturyLink's annual KUSF support disbursements, with one exception, being less than the \$11.4 million cap.³⁸ Staff, therefore, believes the current KUSF cost model, in conjunction with these true-up processes, is sufficient for purposes of the Commission's review in this Docket.

- 4. If the Commission determines a "lesser amount" is appropriate for KUSF support distributions after March 1, 2019, does K.S.A. 66-2008(d)(2) authorize the Commission to implement the new cap or does it require the Commission to present its determination to the Legislature, with the Legislature determining whether to make a statutory change?**

A. Background

K.S.A. 66-2008(d)(2) requires the Commission to review the cap on CenturyLink's annual KUSF support and determine if a lesser amount for disbursements after March 1, 2019 is appropriate. The statute is silent on how the determination of a lesser amount would be implemented.

B. Comments

Sprint stated the Commission does not have authority to change the amount of the cap, but has authority to determine the annual KUSF support available and distributed to CenturyLink.³⁹

In contrast, CenturyLink stated K.S.A. 66-2008(d)(2) authorizes the Commission to determine whether a lower cap is appropriate; however, the statute does not clearly authorize the Commission to modify the cap. The Commission could, therefore, report its findings to the Legislature.⁴⁰ CenturyLink stated a reduction in the cap cannot result in a reduction in the monthly per line KUSF support it receives⁴¹ and, given the elements that comprise its KUSF support fluctuate, a small margin of error exists if the cap is reduced.⁴² Furthermore, if CenturyLink does not receive CAF II auction support, it will qualify to receive more KUSF support and no provision exists for the cap to be increased to ensure it receives KUSF support as required by K.S.A. 66-2008(c)(3).

³⁷ March 2010 Order, June 2010 Order, Docket 08-1023.

³⁸ February R&R, p. 5, Table 1.

³⁹ Sprint Comments, ¶ 3.

⁴⁰ CenturyLink Comments, ¶ 10.

⁴¹ Id., ¶ 11.

⁴² Id.

C. Analysis

K.S.A. 66-2008(d)(2) does not address how a reduction in the cap on CenturyLink's annual KUSF support would be implemented. Staff believes that the Commission would need to make a recommendation to the Legislature to modify the amount of the cap.

RECOMMENDATION:

Staff believes the Commission has authority to review the statutory cap placed on CenturyLink's annual KUSF support distributions and determine if a lesser amount is appropriate for disbursements after March 1, 2019. Staff believes, however, that the Commission would need to make a recommendation to the Legislature to modify the amount of the cap.

For purposes of this review, Staff believes the current KUSF cost model meets the criteria set forth in K.S.A. 66-2008(d)(2). Staff also believes the current cap remains appropriate for KUSF distributions to CenturyLink after March 1, 2019, and recommends that the Commission not take any action to lower the amount of the cap on CenturyLink's annual KUSF support disbursements at this time.

CERTIFICATE OF SERVICE

18-UTDT-356-GIT

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served via electronic service this 23rd day of May, 2018, to the following:

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CERTIFICATE OF SERVICE

18-UTDT-356-GIT

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