

<sup>3</sup>Id.

3. The Commission believes that this docket should be opened to collect the information required to be submitted pursuant to the FCC's rules, and to determine whether the Commission should certify that the ETCs in Kansas have used and will use their federal Universal Service Fund (USF) support appropriately for 2018 and 2020, respectively. The docket should also be used to determine whether Kansas ETCs used their Kansas Universal Service Fund (KUSF) support appropriately in 2018.<sup>4</sup>

4. Commission Staff (Staff) prepared a Report and Recommendation (R&R), dated April 3, 2019, attached hereto and made a part hereof by reference. The R&R addresses the above stated matters and requests the Commission open this docket. The Commission approves Staff's R&R and adopts the request.

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. This docket shall be opened for the purposes of receiving information and certifications to ensure compliance with 47 U.S.C. § 254(e) and to ensure appropriate use of federal USF and KUSF support.

B. The required ETC certifications, along with the attached worksheet(s), shall be filed with the Commission in this docket on or before July 1, 2019. Refer to Staff's R&R to determine which filings need to be made by which entities and how to report the information. Note that copies of the supporting Excel files for Attachments 2-5 should be e-mailed to [c.aarnes@kcc.ks.gov](mailto:c.aarnes@kcc.ks.gov) and [s.reams@kcc.ks.gov](mailto:s.reams@kcc.ks.gov).

C. ETCs that received high-cost KUSF support in 2018 should use the Annual Total amount of support listed for the carrier on Staff Exhibit 1. If an ETC reports a different number,

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<sup>4</sup>See Order Adopting Staff Workshop Report and Issue Resolutions and Soliciting Additional Comments, Docket No. 08-GIMT-154-GIT (Jan. 30, 2009).

it needs to explain why the different amount was used and why it differs from the amount on Staff Exhibit 1.

D. ETCs are reminded that any information filed confidentially shall comply with K.A.R. 82-1-221a. This includes K.A.R. 82-1-221a(a)(5)'s requirement of a written explanation explaining whether the information constitutes a trade secret or confidential commercial information, and an explanation regarding the harm or potential harm disclosure would cause. Failure to comply with such regulation may result in a penalty or public disclosure of the information.

E. Citizen's Utility Ratepayer Board is made a party to this docket and shall be served with all entries of appearance, comments, forms and pleadings.


F. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).

G. The Commission retains jurisdiction over the subject matter and parties for the purpose of issuing such further order, or orders, as it may deem necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Keen, Chair; Albrecht, Commissioner; Emler, Commissioner

Dated: 04/11/2019

  
\_\_\_\_\_  
Lynn M. Retz  
Secretary to the Commission

MRN

**REPORT AND RECOMMENDATION  
UTILITIES DIVISION**

**TO:** Chair Dwight D. Keen  
Commissioner Shari Feist Albrecht  
Commissioner Jay Scott Emler

**FROM:** Christine Aarnes, Chief of Telecommunications & SPP Affairs  
Sandy Reams, Assistant Chief of Telecommunications  
Jeff McClanahan, Director of Utilities

**DATE:** April 3, 2019

**SUBJECT:** Docket No. 19-GIMT-399-GIT  
*In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support.*

**EXECUTIVE SUMMARY:**

The Federal Communications Commission (FCC) requires Eligible Telecommunications Carriers (ETCs) to submit specific information as outlined in 47 C.F.R. § 54.313 to the states, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1<sup>st</sup> of each year, beginning in 2012.<sup>1</sup> In addition, pursuant to 47 C.F.R. § 54.314 and 47 U.S.C. § 254(e), states that want ETCs in their state to receive funding pursuant to the federal high-cost program must file an annual certification with USAC and the FCC stating that all federal high-cost support provided to such carriers within that state was used in the preceding calendar year and will be used in the following calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Staff recommends the Commission open a generic docket to collect the required filings and to determine whether the Commission should provide the aforementioned certification letter to the FCC and USAC. The docket should further include a certification and analysis to ensure Kansas Universal Service Fund (KUSF) support was used in 2018 and will be used in 2020 appropriately.

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<sup>1</sup> *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, ( May 14, 2012), ¶ 10.*

Each filing should be submitted separately by company and a copy of the supporting Excel files for Attachments 2-5 should be emailed to Staff at [c.arnes@kcc.ks.gov](mailto:c.arnes@kcc.ks.gov) and [s.reams@kcc.ks.gov](mailto:s.reams@kcc.ks.gov).

## **BACKGROUND:**

Section 254(e) of the Federal Telecommunications Act provides that carriers receiving federal high-cost support shall use the support “*only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.*” (Emphasis added). The FCC has delegated responsibility for oversight of Section 254(e) to the states.

In order for ETCs in Kansas to be eligible to receive federal high-cost support in 2020, the Commission must send a letter by October 1 (of each year) to the FCC and USAC stating that the companies named in the letter have provided certification that they will use their federal high-cost support in the following year and used their federal high-cost support in the prior year in accordance with Section 254(e).

In addition, the Commission determined on January 30, 2009, in Docket No. 08-GIMT-154-GIT (154 Docket), that ETCs must provide information to document that the carriers appropriately spent their KUSF support and will continue to spend their KUSF support appropriately.

## **ANALYSIS:**

### **Kansas ETC Certification Forms**

Listed below are the Forms and Instructions that will be used for this year’s filing:

#### **Attachment**

<b><u>No.</u></b>	<b><u>Description</u></b>
1	Certification Form for Federal High-Cost Support and KUSF Support
2a	Kansas’ Test for Certification for Incumbent Local Exchange Carriers (ILECs)
2b	Kansas’ Test for Certification for ILECs Using Illustrative Data
3a	Kansas’ Test for Certification for Competitive ETCs
3b	Kansas’ Test for Certification for Competitive ETCs Using Illustrative Data
4	Narrative Report for New Investments
5	Narrative Report for New Investments in Southwestern Bell Telephone Company d/b/a AT&T Kansas (SWBT) Exchanges (Certifies KUSF Support)
6	Additional ETC Requirements Adopted in Docket No. 06-GIMT-446-GIT
7	Certification Instructions

Attachment 7 contains the instructions for completing Attachments 1-6.

- ILECs that received in 2018 and/or will receive federal high-cost support and/or KUSF support in 2020 should complete Attachments 1, 2a, 4, and 6.
- Competitive ETCs that received in 2018 and/or will receive federal high-cost support in 2020 and competitive ETCs that received KUSF support in 2018 need to complete Attachments 1, 3a, 4, 5 and 6. However, competitive ETCs providing universal service using Local Wholesale Complete (LWC) must submit only Attachments 1 and 6 and

include a statement that the company received KUSF support only for lines to which it provisions service via LWC.

- Lifeline-Only ETCs need to complete only Attachment 6.

Attachments 2b and 3b are provided for illustration purposes to complete the respective 2a and 3a cost reports. Competitive ETCs that operate in SWBT exchanges and received KUSF support for January and February 2018 need to complete Attachment 5 by reporting new investments made in KUSF-supported exchanges, as required in the Commission's January 30, 2009 Order in the 154 Docket.<sup>2</sup> Additionally, competitive ETCs should exclude expenses and investments for SWBT exchanges when justifying federal high-cost support on Attachments 3a and 4, pursuant to the Commission's August 9, 2007 Order in the 07-GIMT-498-GIT (498 Docket).<sup>3</sup>

In last year's ETC certification proceeding (Docket No. 18-GIMT-394-ETC), almost half of the ETCs reported the net amount of KUSF received after deducting the carrier's assessments owed to the Fund. The carrier's statutory requirement to contribute to the KUSF is separate and distinct from its high-cost funding and should not be deducted from the amount of high-cost KUSF funding the carrier received. Rather, the gross amount of KUSF support received is to be reported on Attachments 2a and 3a.

**Staff has listed the amount of high-cost KUSF support disbursed to ETCs in 2018 on Staff Exhibit 1. ETCs should use the amount listed on Staff Exhibit 1 for the amount of KUSF high-cost funding received in 2018. If a different number is reported, the carrier needs to explain.**

### **RECOMMENDATION:**

Staff recommends the Commission open a generic docket to collect the required filings and to determine whether the Commission should certify to the FCC and USAC that all federal high-cost support provided to ETCs in Kansas was used in 2018 and will be used in 2020 in accordance with Section 254(e). The docket should further include a certification and analysis to ensure KUSF support was used in 2018 and will be used in 2020 appropriately.

Staff further recommends the Commission require ETCs and competitive ETCs to submit their ETC certifications for 2018, along with the required attached worksheets on or before July 1, 2019. Each filing should be submitted separately by company and a copy of the supporting Excel files for Attachments 2-5 should be emailed to [c.arnes@kcc.ks.gov](mailto:c.arnes@kcc.ks.gov) and [s.reams@kcc.ks.gov](mailto:s.reams@kcc.ks.gov). Carriers should be reminded that late or incomplete filings may result in fines or penalties.

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<sup>2</sup> Commission Order dated January 30, 2009, 154 Docket, Staff Report on Workshop, page 12.

<sup>3</sup> In the 498 Docket, the Commission reaffirmed its previous decision not to certify competitive ETCs' expenditures and investments of federal high-cost support in non-supported areas, which are areas served by SWBT, except to the extent the competitive ETCs can justify an allocation of a portion of expenditures and investments of federal high-cost support to serve a supported area.

**KUSF High-Cost Support Paid to ETCs**  
**January - December 2018**  
**(Annual Total should match amount reported. Include explanation for any variance)**

<b>Company</b>	<b>Jan. - Dec. 2018 Annual Total (A = B + C)</b>	<b>Jan - Feb. 18 Total (B)</b>	<b>March -Dec. 18 Total (C)</b>
Bluestem (1)	\$ -	\$ -	\$ -
Blue Valley	671,850	111,975	559,875
Columbus	-	-	-
Craw-Kan	2,375,861	395,977	1,979,884
Cunningham	883,099	147,183	735,916
Elkhart	15,392	2,565	12,827
Consolidated Communications of Missouri f/k/a FairPoint-MO (2)	-	-	-
Golden Belt	609,983	101,664	508,319
Gorham	559,380	93,230	466,150
H & B	699,705	116,618	583,088
Haviland	-	-	-
Home	580,718	96,786	483,932
JBN	662,322	115,180	547,142
KanOkla	714,138	119,023	595,115
LaHarpe	8,885	2,962	5,923
Madison	234,499	39,083	195,416
Mokan	-	-	-
Moundridge	-	-	-
Mutual	226,435	37,739	188,696
Peoples	520,342	86,889	433,453
Pioneer	3,708,259	618,043	3,090,216
Rainbow	820,635	136,773	683,863
Rural	2,741,950	456,992	2,284,958
S & A	356,666	59,444	297,222
S & T	1,237,933	206,322	1,031,611
South Central	250,311	41,718	208,593
Southern Kansas	1,231,598	205,266	1,026,332
Consolidated Communications of Kansas f/k/a Sunflower (3)	-	-	-
Totah	245,170	40,862	204,308
Tri-County	1,369,146	228,191	1,140,955
Tri-County - Council Grove	998,173	166,362	831,811
Twin Valley	3,677,608	612,935	3,064,673
United Telephone Assoc.	311,653	51,942	259,711
Wamego	1,746,876	306,669	1,440,207
Wheat State	639,225	106,537	532,688
Wilson	751,002	125,167	625,835
Zenda	306,732	51,810	254,922
United Telephone Companies of Kansas d/b/a CenturyLink (4)	7,712,405	1,669,135	6,043,269
Big River	\$ 3,894	\$ 1,947	\$ -
H&B Cable	5,005	2,503	-
NE Colorado d/b/a Viaero	7,648	3,824	-
Nex-Tech, Inc.	2,229	1,115	-
Nex-Tech Wireless	257,505	128,753	-
Sage Telecom	-	-	-
United Wireless Comm.	49,461	24,731	-
Epic Touch	2,971	1,485	-
WestLink	42,615	21,307	-
Total United Wireless Comm.	\$ 95,047	\$ 47,523	\$ -

Notes:

- (1) Bluestem Telephone Company was merged into Consolidated Communications of Kansas, effective January 1, 2019. Docket No. 19-BSTT-172-CCS/19-SFLT-197-CCN.
- (2) FairPoint-MO changed its name to Consolidated Communications of Missouri, effective January 1, 2019. Docket No. 19-FCMT-161-CCN.
- (3) Sunflower Telephone Company changed its name to Consolidated Communications of Kansas, effective January 1, 2019. Docket No. 19-SFLT-197-CCN.
- (4) Reflects KUSF support paid to CenturyLink, adjusted for true-ups approved by the Commission.

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Chair Dwight D. Keen  
Commissioner Shari Feist Albrecht  
Commissioner Jay Scott Emler

In the Matter of Certification of Compliance )  
with Section 254(e) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 19-GIMT-399-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 \_\_\_\_\_ of  
\_\_\_\_\_ (Company/Cooperative). 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 \_\_\_\_\_ (Company/Cooperative) to the statements made in this  
certification.

2. \_\_\_\_\_ (Company/Cooperative) was named as  
an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support  
purposes in Docket No. \_\_\_\_\_ by order dated \_\_\_\_\_ and  
KUSF support purposes in Docket No. \_\_\_\_\_ by order dated \_\_\_\_\_.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by  
\_\_\_\_\_ (Company/Cooperative) was used in the proceeding calendar year  
**2018** and will be used in the new calendar year **2020 only** for the provision, maintenance, and upgrading of



## **Attachment 1**

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.

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

\_\_\_\_\_  
Printed/Typed Name

Executed on \_\_\_\_\_ date.

Email address: \_\_\_\_\_

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 2a**

**Company Name:** \_\_\_\_\_

**DATA YEAR:** 2018

	<u>LINE</u>	<u>REGULATED AMOUNT</u>
<b>WORKING LOOPS</b>		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
<b>INVESTMENT</b>		
1. Plant Accounts		
a. Acct 2001	(160)	
2. Selected Plant Accounts		
a. Acct 2210	(230)	
b. Acct 2220	(235)	
c. Acct 2230	(240)	
d. Total Central Office Equip	(245)	\$ -
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410	(255)	
<b>AMORTIZABLE TANGIBLE ASSETS</b>		
Acct. 2680 Tot Assets	(800)	
Acct. 2680 (2230) COE Trans	(805)	
Acct. 2680 (Cat. 4.13) COE Trans	(810)	
Acct. 2680 (2410) Total CWF	(815)	
Acct. 2680 (2410) CWF-Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
<b>PART 36 - COST STUDY DATA</b>		
1. Cost Study Avg C&WF Acct 2410	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		#DIV/0!
4. COE CAT 4.13 Factor		#DIV/0!
5. Switching Factor		1.000000

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 2a**

**Company Name:** \_\_\_\_\_

**DATA YEAR:** 2018

**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)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110	(335)	
b. Acct 6110 (benefits)	(340)	
c. Acct 6110 (rents)	(345)	
d. Acct 6120	(350)	
e. Acct 6120 (benefits)	(355)	
f. Acct 6120 (rents)	(360)	
g. Acct 6210	(365)	
h. Acct 6210 (benefits)	(370)	
i. Acct 6210 (rents)	(375)	
j. Acct 6220	(380)	
k. Acct 6220 (benefits)	(385)	
l. Acct 6220 (rents)	(390)	
m. Acct 6230	(395)	
n. Acct 6230 (benefits)	(400)	
o. Acct 6230 (rents)	(405)	
p. (sum of lines 365+380+395)	(410)	-
q. Acct 6410	(430)	
r. Acct 6410 (benefits)	(435)	
s. Acct 6410 (rents)	(440)	
t. Total Expenses Accts. 6110 - 6410	(445)	\$ -
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	
b. Acct 6530 (benefits)	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210)	(510)	
b. Acct 6560 (#2220)	(515)	
c. Acct 6560 (#2230)	(520)	
d. Acct 6560 (#2210-2230)	(525)	\$ -
e. Acct 6560 (#2410)	(530)	
5. Corporate Operating Expenses		
a. Acct 6710	(535)	
b. Acct 6710 (benefits)	(540)	
c. Acct 6720	(550)	
d. Acct 6720 (benefits)	(555)	
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ -
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	
Sum of All Expenses (Excluding Depreciation)		\$ -
7. Taxes		
a. Acct 7200	(650)	

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 2a**

<b>Company Name:</b> _____																																													
<b>DATA YEAR:</b> <b>2018</b>																																													
<p align="center">Test for use of FUSF &amp; KUSF</p> <p>CAPITAL:</p> <table style="width: 100%;"> <tr> <td style="width: 60%;">1. Category 1 C&amp;WF</td> <td style="width: 40%; text-align: right;">#DIV/0!</td> </tr> <tr> <td>2. Category 4.13 COE and Switching</td> <td style="text-align: right;">#DIV/0!</td> </tr> </table> <p>MAINTENANCE:</p> <table style="width: 100%;"> <tr> <td style="width: 60%;">3. CWF - MAINT. EXP.</td> <td style="width: 40%; text-align: right;">#DIV/0!</td> </tr> <tr> <td>4. COE - MAINT. SW</td> <td style="text-align: right;">-</td> </tr> <tr> <td>5. COE - MAINT-OP SYSTEM</td> <td style="text-align: right;">-</td> </tr> <tr> <td>6. COE - MAINT. - TRANS.</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>7. CWF - NETWORK SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>8. COE - NETWORK SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>9. CWF GENERAL SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>10. COE GENERAL SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>20. CWF NETWORK OPERATION</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>21. COE NETWORK OPERATION</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>22. CWF EXEC. &amp; PLANNING</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>23. COE EXEC. &amp; PLANNING</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>24. CWF GENERAL ADMIN.</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>25. COE GENERAL ADMIN.</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>26. CWF OPERATING TAXES</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>27. COE OPERATING TAXES</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>28. CWF BENEFITS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>29. COE BENEFITS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>30. CWF RENTS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>31. COE RENTS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> </table>		1. Category 1 C&WF	#DIV/0!	2. Category 4.13 COE and Switching	#DIV/0!	3. CWF - MAINT. EXP.	#DIV/0!	4. COE - MAINT. SW	-	5. COE - MAINT-OP SYSTEM	-	6. COE - MAINT. - TRANS.	#DIV/0!	7. CWF - NETWORK SUPPORT	#DIV/0!	8. COE - NETWORK SUPPORT	#DIV/0!	9. CWF GENERAL SUPPORT	#DIV/0!	10. COE GENERAL SUPPORT	#DIV/0!	20. CWF NETWORK OPERATION	#DIV/0!	21. COE NETWORK OPERATION	#DIV/0!	22. CWF EXEC. & PLANNING	#DIV/0!	23. COE EXEC. & PLANNING	#DIV/0!	24. CWF GENERAL ADMIN.	#DIV/0!	25. COE GENERAL ADMIN.	#DIV/0!	26. CWF OPERATING TAXES	#DIV/0!	27. COE OPERATING TAXES	#DIV/0!	28. CWF BENEFITS - TTL OPER EXP	#DIV/0!	29. COE BENEFITS - TTL OPER EXP	#DIV/0!	30. CWF RENTS - TTL OPER EXP	#DIV/0!	31. COE RENTS - TTL OPER EXP	#DIV/0!
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Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification

19-GIMT-399-GIT  
Attachment 2a

Company Name: \_\_\_\_\_

DATA YEAR: 2018

A. Total Cash Expenditures Associated with USF #DIV/0!

B. Certified Federal USF Receipts:

B1. High Cost Loop Support / Frozen High Cost Support

B2. Safety Net Support

B3. Safety Valve Support for acquired Exch.

B4. Connect America Cost Model

B5. Alternative Connect America Model

**B8. Total Federal USF Receipts 0**

C. Gross KUSF Receipts (do not deduct KUSF assessments paid)

D. Total FUSF and KUSF Receipts -

E. Do Expenditures Exceed FUSF Receipts? #DIV/0!

Amount Expenditures Exceed Certified FUSF #DIV/0! [A - B7]

(negative number means FUSF exceeds Expenditures)

F. Do Expenditures Exceed FUSF & KUSF Receipts? #DIV/0!

Amount Expenditures Exceed Certified FUSF & KUSF #DIV/0! [A - D]

(negative number means FUSF & KUSF exceeds Expenditures)

Please provide the following information:

Contact: \_\_\_\_\_

Title: \_\_\_\_\_

Phone No.: \_\_\_\_\_

E-Mail: \_\_\_\_\_

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 2a**

**Company Name:** \_\_\_\_\_

**DATA YEAR:** 2018

	LINE	REGULATED AMOUNT
<b>WORKING LOOPS</b>		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
<b>INVESTMENT</b>		
1. Plant Accounts		
a. Acct 2001	(160)	
2. Selected Plant Accounts		
a. Acct 2210	(230)	
b. Acct 2220	(235)	
c. Acct 2230	(240)	
d. Total Central Office Equip	(245)	\$ -
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410	(255)	
<b>AMORTIZABLE TANGIBLE ASSETS</b>		
Acct. 2680 Tot Assets	(800)	
Acct. 2680 (2230) COE Trans	(805)	
Acct. 2680 (Cat. 4.13) COE Trans	(810)	
Acct. 2680 (2410) Total CWF	(815)	
Acct. 2680 (2410) CWF-Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
<b>PART 36 - COST STUDY DATA</b>		
1. Cost Study Avg C&WF Acct 2410	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		#DIV/0!
4. COE CAT 4.13 Factor		#DIV/0!
5. Switching Factor		1.000000

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 2a**

**Company Name:** \_\_\_\_\_

**DATA YEAR:** 2018

**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)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110	(335)	
b. Acct 6110 (benefits)	(340)	
c. Acct 6110 (rents)	(345)	
d. Acct 6120	(350)	
e. Acct 6120 (benefits)	(355)	
f. Acct 6120 (rents)	(360)	
g. Acct 6210	(365)	
h. Acct 6210 (benefits)	(370)	
i. Acct 6210 (rents)	(375)	
j. Acct 6220	(380)	
k. Acct 6220 (benefits)	(385)	
l. Acct 6220 (rents)	(390)	
m. Acct 6230	(395)	
n. Acct 6230 (benefits)	(400)	
o. Acct 6230 (rents)	(405)	
p. (sum of lines 365+380+395)	(410)	-
q. Acct 6410	(430)	
r. Acct 6410 (benefits)	(435)	
s. Acct 6410 (rents)	(440)	
t. Total Expenses Accts. 6110 - 6410	(445)	\$ -
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	
b. Acct 6530 (benefits)	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210)	(510)	
b. Acct 6560 (#2220)	(515)	
c. Acct 6560 (#2230)	(520)	
d. Acct 6560 (#2210-2230)	(525)	\$ -
e. Acct 6560 (#2410)	(530)	
5. Corporate Operating Expenses		
a. Acct 6710	(535)	
b. Acct 6710 (benefits)	(540)	
c. Acct 6720	(550)	
d. Acct 6720 (benefits)	(555)	
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ -
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	
Sum of All Expenses (Excluding Depreciation)		\$ -
7. Taxes		
a. Acct 7200	(650)	

**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 2a**

<b>Company Name:</b> _____																																													
<b>DATA YEAR:</b> <b>2018</b>																																													
<p align="center">Test for use of FUSF &amp; KUSF</p> <p>CAPITAL:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">1. Category 1 C&amp;WF</td> <td style="width: 40%; text-align: right;">#DIV/0!</td> </tr> <tr> <td>2. Category 4.13 COE and Switching</td> <td style="text-align: right;">#DIV/0!</td> </tr> </table> <p>MAINTENANCE:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">3. CWF - MAINT. EXP.</td> <td style="width: 40%; text-align: right;">#DIV/0!</td> </tr> <tr> <td>4. COE - MAINT. SW</td> <td style="text-align: right;">-</td> </tr> <tr> <td>5. COE - MAINT-OP SYSTEM</td> <td style="text-align: right;">-</td> </tr> <tr> <td>6. COE - MAINT. - TRANS.</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>7. CWF - NETWORK SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>8. COE - NETWORK SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>9. CWF GENERAL SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>10. COE GENERAL SUPPORT</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>20. CWF NETWORK OPERATION</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>21. COE NETWORK OPERATION</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>22. CWF EXEC. &amp; PLANNING</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>23. COE EXEC. &amp; PLANNING</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>24. CWF GENERAL ADMIN.</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>25. COE GENERAL ADMIN.</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>26. CWF OPERATING TAXES</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>27. COE OPERATING TAXES</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>28. CWF BENEFITS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>29. COE BENEFITS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>30. CWF RENTS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> <tr> <td>31. COE RENTS - TTL OPER EXP</td> <td style="text-align: right;">#DIV/0!</td> </tr> </table>		1. Category 1 C&WF	#DIV/0!	2. Category 4.13 COE and Switching	#DIV/0!	3. CWF - MAINT. EXP.	#DIV/0!	4. COE - MAINT. SW	-	5. COE - MAINT-OP SYSTEM	-	6. COE - MAINT. - TRANS.	#DIV/0!	7. CWF - NETWORK SUPPORT	#DIV/0!	8. COE - NETWORK SUPPORT	#DIV/0!	9. CWF GENERAL SUPPORT	#DIV/0!	10. COE GENERAL SUPPORT	#DIV/0!	20. CWF NETWORK OPERATION	#DIV/0!	21. COE NETWORK OPERATION	#DIV/0!	22. CWF EXEC. & PLANNING	#DIV/0!	23. COE EXEC. & PLANNING	#DIV/0!	24. CWF GENERAL ADMIN.	#DIV/0!	25. COE GENERAL ADMIN.	#DIV/0!	26. CWF OPERATING TAXES	#DIV/0!	27. COE OPERATING TAXES	#DIV/0!	28. CWF BENEFITS - TTL OPER EXP	#DIV/0!	29. COE BENEFITS - TTL OPER EXP	#DIV/0!	30. CWF RENTS - TTL OPER EXP	#DIV/0!	31. COE RENTS - TTL OPER EXP	#DIV/0!
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Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification

19-GIMT-399-GIT  
Attachment 2a

Company Name: \_\_\_\_\_

DATA YEAR: 2018

A. Total Cash Expenditures Associated with USF #DIV/0!

B. Certified Federal USF Receipts:

B1. High Cost Loop Support / Frozen High Cost Support

B2. Safety Net Support

B3. Safety Valve Support for acquired Exch.

B4. Connect America Cost Model

B5. Alternative Connect America Model

**B8. Total Federal USF Receipts 0**

C. Gross KUSF Receipts (do not deduct KUSF assessments paid)

D. Total FUSF and KUSF Receipts -

E. Do Expenditures Exceed FUSF Receipts? #DIV/0!

Amount Expenditures Exceed Certified FUSF #DIV/0! [A - B7]

(negative number means FUSF exceeds Expenditures)

F. Do Expenditures Exceed FUSF & KUSF Receipts? #DIV/0!

Amount Expenditures Exceed Certified FUSF & KUSF #DIV/0! [A - D]

(negative number means FUSF & KUSF exceeds Expenditures)

Please provide the following information:

Contact: \_\_\_\_\_

Title: \_\_\_\_\_

Phone No.: \_\_\_\_\_

E-Mail: \_\_\_\_\_

**Competitive ETC Investment and Expense  
Test for USF Certification**

**19-GIMT-399-GIT  
Attachment 3a**

Company Name : \_\_\_\_\_

All CETCs must complete this form to receive certification for its use of FUSF and KUSF support, pursuant to 47 C.F.R. § 54.314, Kansas statutes, and KCC Requirements. Please attach additional pages if necessary. If you have any questions, please email the KCC Staff at c.arnes@kcc.ks.gov or s.reams@kcc.ks.gov.

<b>Data Year</b>	<b>2018</b>
----------------------	-------------

	AMOUNT FOR KANSAS	ALLOCATION PERCENT	FUSF CODE (see Notes)	AMOUNT FOR FUSF AREAS (Excluding SWBT Area) D=AxB	ALLOCATION PERCENT	KUSF CODE (see Notes)	AMOUNT FOR KUSF AREAS (Including SWBT Area) G = Ax E
	A	B	C		E	F	
FUSF WORKING LOOPS/LINES							
KUSF SUPPORTED LINES							
<u>NEW INVESTMENTS:</u>							
1. SWITCHING				-			-
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)				-			-
<b>SUBTOTAL NEW INVESTMENTS</b>	\$ -			\$ -			\$ -
<u>EXPENSES:</u>							
3. SWITCH MAINTENANCE				-			-
4. OUTSIDE PLANT MAINTENANCE				-			-
5. NETWORK SUPPORT				-			-
6. ADMINISTRATIVE EXPENSE				-			-
<b>SUBTOTAL EXPENSES</b>	\$ -			\$ -			\$ -
<b>A. TOTAL CASH EXPENDITURES ASSD WITH USF</b>	\$ -			\$ -			\$ -
<u>B. CERTIFIED FUSF RECEIPTS FOR CETCS</u>							
B1. Frozen High Cost Support							
B2. Mobility Fund Support							
B3. Rural Broadband Experiments Fund							
B4. CAF II Support							
<b>B5. Total Certified Federal USF Receipts</b>				\$ -			\$ -
C. KUSF RECEIPTS				\$ -			\$ -
D. TOTAL FUSF AND/OR KUSF				\$ -			\$ -
<b>E. DO EXPENDITURES EXCEED FUSF RECEIPTS?</b> <b>No</b>				\$ -			\$ -
(negative number means FUSF exceeds Expenditures)							
<b>F. DO EXPENDITURES EXCEED FUSF and/or KUSF RECEIPTS?</b> <b>No</b>				\$ -			\$ -
(negative number means KUSF exceeds Expenditures)							

**No**

**Notes:**

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
  - a. Based on number of switched MOUs from USF supported cell sites.
  - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
  - c. Based on percent of USF served areas to all areas.

Contact Name: \_\_\_\_\_ Title: \_\_\_\_\_

Phone No.: \_\_\_\_\_ E-Mail: \_\_\_\_\_

Example  
CETC Investment and Expense  
Test for USF Certification

19-GIMT-399-GIT  
Attachment 3b

Company Name : Everyday Telephone Company, Inc.

All CETCs must complete this form to receive certification for its use of FUSF and KUSF support, pursuant to 47 C.F.R. § 54.314, Kansas statutes, and KCC Requirements. Please attach additional pages if necessary. If you have any questions, please email the KCC Staff at c.arnes@kcc.ks.gov or s.reams@kcc.ks.gov.

Data  
Year      2018

	AMOUNT FOR KANSAS	ALLOCATION PERCENT	FUSF CODE (see Notes)	AMOUNT FOR FUSF AREAS (Excluding SWBT Area) D=AxB	ALLOCATION PERCENT	KUSF CODE (see Notes)	AMOUNT FOR KUSF AREAS (Including SWBT Area) G = AxE
	A	B	C		E	F	G
FUSF WORKING LOOPS/LINES	50,000	N/A		17,500	N/A		15,000
KUSF SUPPORTED LINES							
<b>NEW INVESTMENTS:</b>							
1. SWITCHING	5,000,000	35%	a	1,750,000	50%		2,500,000
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)	7,000,000	62%	b	4,340,000	75% c		5,250,000
<b>SUBTOTAL NEW INVESTMENTS</b>	<b>12,000,000</b>			<b>6,090,000</b>			<b>7,750,000</b>
<b>EXPENSES:</b>							
3. SWITCH MAINTENANCE	1,500,000	75%	a	1,125,000	25%		375,000
4. OUTSIDE PLANT MAINTENANCE	4,000,000	52%	c	2,080,000	48%		1,920,000
5. NETWORK SUPPORT	500,000	52%	c	260,000	48%		240,000
6. ADMINISTRATIVE EXPENSE	400,000	75%	a	300,000	25%		100,000
<b>SUBTOTAL EXPENSES</b>	<b>6,400,000</b>			<b>3,765,000</b>			<b>2,635,000</b>
<b>A. TOTAL CASH EXPENDITURES ASSD WITH USF</b>	<b>18,400,000</b>			<b>9,855,000</b>			<b>10,385,000</b>
<b>B. CERTIFIED FUSF RECEIPTS FOR CETCS</b>							
B1. Frozen High Cost Support				83,500			83,500
B2. Mobility Fund Support							
B3. Rural Broadband Experiments Fund							
B4. CAF II Support							
<b>B5. Total Certified Federal USF Receipts</b>				<b>\$ 83,500</b>			<b>\$ 83,500</b>
<b>C. KUSF RECEIPTS</b>				<b>\$ 200,000</b>			<b>\$ 200,000</b>
<b>D. TOTAL FUSF AND/OR KUSF</b>				<b>\$ 283,500</b>			<b>\$ 283,500</b>
<b>E. DO EXPENDITURES EXCEED FUSF RECEIPTS?</b> <b>Yes</b>				<b>\$ 9,771,500</b>			<b>\$ 10,301,500</b>
(negative number means FUSF exceeds Expenditures)							
<b>F. DO EXPENDITURES EXCEED FUSF and/or KUSF RECEIPTS?</b> <b>Yes</b>				<b>\$ 9,571,500</b>		<b>Yes</b>	<b>\$ 10,101,500</b>
(negative number means KUSF exceeds Expenditures)							

**Notes:**

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): [the following are examples only, not a complete list.]
  - a. Based on number of switched MOUs from USF supported cell sites.
  - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
  - c. Based on percent of USF served areas to all areas.

Contact: Robert Jones

Title: Accounting

Phone No.: 316-555-9876

E-Mail: [rjones@edtc.com](mailto:rjones@edtc.com)



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

Supplemental  
PagesPage 2



# Narrative Report for New Investments in SWBT Exchanges

ETC Certification for Use of KUSF Support

Provided to the Kansas Corporation Commission

Carrier Name: 0

Data Year: 2018

Supplemental  
Pages

Town or Exchange A	Description of Improvement B	Cash Investment C	Allocation % D	Notes E	Amount Used in the KUSF Supported Areas F= C x D
Subtotal		0			0

Annual ETC 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

(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 your company attempted to provide service to those potential customers.

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

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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 \_\_\_\_\_ of the \_\_\_\_\_  
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding \_\_\_\_\_(Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_(Company/ Cooperative) 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 \_\_\_\_\_(date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed/Typed Name

**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION**

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

(Please type or print legibly)

1. My title is \_\_\_\_\_ of the \_\_\_\_\_  
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding \_\_\_\_\_(Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_(Company/ Cooperative) is in compliance with the CTIA Code.

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 \_\_\_\_\_(date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print / Typed Name

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

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

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

(Please type or print legibly)

1. My title is \_\_\_\_\_ of the \_\_\_\_\_  
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) 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 \_\_\_\_\_(date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services throughout the service area for which it has been designated “using media of general distribution.”

**Please complete the following:**

Name of Media	Type of Media	Geographic Areas Reached	Dates Published

(If necessary, please attach additional pages.)

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

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

1. My title is \_\_\_\_\_ of the \_\_\_\_\_  
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the  
Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am  
binding \_\_\_\_\_(Company/Cooperative) to the statements made in this  
certification.

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 \_\_\_\_\_ (date).

Printed/Typed Name

Kansas Corporation Commission  
ETC Certification Instructions for Attachments 1 - 6

The Kansas Corporation Commission (KCC) requires every Eligible Telecommunications Carrier (ETC) to complete the ETC certification forms as part of the annual ETC certification process.

If you have any questions, please contact the Telecommunications Division at [c.aarnes@kcc.ks.gov](mailto:c.aarnes@kcc.ks.gov) or [s.reams@kcc.ks.gov](mailto:s.reams@kcc.ks.gov).

**1. Line Definitions:**

**Working Loops for federal High-Cost Supported Services**

Provide the line counts by incumbent local exchange carrier (ILEC) study area or wire center that were reported to the Universal Service Administrative Company (USAC) for the same year as the cost data is reported.

**2. Attachments 2 and 3 – ILEC ETC and Competitive ETC Investment and Expense Reports**

**a. ILEC ETC Report Format**

Attachment 2a is used by Incumbent ETCs to report their use of federal high-cost support received in the prior year. The report is a modified version of the cost information submitted to USAC for high-cost support, with the prior year data used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually used to provide universal service in the supported areas for which the support was paid.<sup>1</sup> Support should be segregated by the type of federal high-cost support received. KUSF support is required to be certified and, similar to federal support, the support must also be used to provide and maintain universal service. **High-cost support reported should reflect the gross amount, not the net amount received after assessments owed to the Fund were deducted. Lifeline support received should not be included in the amount of high-cost support received as this is not high-cost support. The high-cost KUSF amount listed on Staff Exhibit 1 should be reported for KUSF high-cost support.** Attachment 2b is an example of how to complete Form 2a.

**b. Competitive ETC (CETC) Report Format**

Attachment 3a is used by CETCs to report their use of high-cost funds received in the prior year. Prior year data is used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually expended to provide universal service in the supported areas for which the support was paid.<sup>2</sup> If no universal service support was received for the prior year, the company need only file a statement to

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<sup>1</sup> Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

<sup>2</sup> Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

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that effect. Cost information is split by new investment expenditures and expenses. This is compared to the amount of federal high-cost support received. KUSF support is required to be certified and, similar to federal high-cost support, the support must also be used to provide and maintain universal service. **High-cost support reported should be the gross amount, not the amount received after assessments are deducted. Please use the amount of high-cost KUSF support provided by Staff in Exhibit 1.** Attachment 3b is an example showing how to complete Form 3a.

The company should exclude the cost of transport between switches. This makes the reporting consistent with the costs submitted by the Incumbent ETCs. Once a call leaves the local switch, it is on the interoffice network and costs for those facilities are not included. The switch is the device that provides dial tone and/or switching the call to the proper location for termination. This can be a smart remote with stand-alone capability<sup>3</sup> or a stand-alone/host switch.

### **c. Allocation Methods**

The cost reports attempt to capture the cost to provide universal service and exclude certain types of investments and expenses. The FCC has deregulated some services, including voice messaging and inside wire; therefore, they should be excluded.

The allocation of new investments and expenses may play an important role in properly identifying the costs associated with the USF supported areas. Incumbent LECs utilize a series of allocation rules in the Separations process that are specific and documented. However, even ILECs may encounter situations where only a portion of their territory receives high-cost support.

CETCs, especially, may serve exchanges that are supported as well as areas that are not supported. Some costs may be specific to the supported area, while others may involve both areas. A number of valid methods are available to make these allocations. Below is a list of examples that will normally be acceptable in making allocations:

Outside plant projects –the supported areas’ allocations can be determined as follow:

1. Identify the specific costs in supported areas and assign it as a qualified cost.
2. Determine the number of lines in the supported area versus the total lines served by the facilities.
3. Determine the geographic area in the supported area versus the total area served (this method is especially applicable to cellular towers).
4. Calculate the percent of miles on a cable that serves a supported area versus the total miles to all the areas.
5. Calculate the percent of fiber strands or cable pair that go to a supported area versus the total strands in service.

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<sup>3</sup> A smart remote with stand-alone capability is one that can still provide local calling even if its link to the host switch is severed.

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Expenses may be allocated based on the allocation determined for the related investment, or based on a percentage of lines or customers in the supported areas.

Maintenance expense may be allocated based on the number of items being maintained that are in the supported areas.

**Switching may be allocated using the following methods:**

1. Calculate the percent of Minutes of Use (MOU) for the lines in the supported area versus all minutes.
2. Calculate the percent of lines in the supported area versus all lines served by the switch.
3. Similar allocations could apply to circuit equipment used for switched access.

**General rules to follow when deciding on the allocation method:**

1. Allocations may be calculated by individual investment location, by region or for the whole state.
2. Companies may decide which methods work best based on the accounting and network information they have available.
3. Methods can vary for different types of investment or expense.
4. The method is one that is appropriate for the item being allocated (i.e. MOU would be appropriate for a switch allocation but not for a loop).
5. The allocation is based on measurable data.
6. The method captures a reasonable cost of the investment and/or expense.
7. The company should maintain consistency in the allocation methods used from year to year when providing data to the Commission. This will avoid gaming the system and provide the ability to make comparisons from year to year.
8. When a company changes an allocation method, it should be noted in the data submission, complete with rationale explaining why this new method is more appropriate. Also, the company should provide a calculation of what effect the new allocation would have on the prior year's report.

**4. Attachment 4 - New Investments Utilizing High-Cost Support in Supported Areas**

**a. Report Format**

For the prior calendar year, please provide a description of the new investments in supported areas where the high-cost support was used. Please use a format similar to the *Narrative for New Investment Report*. The first example is for a wireless ETC and the second example is for a wireline ETC. It is acceptable to submit a mechanized report if it contains the essential information. Any projects over the threshold should be listed separately. Those projects less than the threshold should be combined into one or more line items. See 3b below for the threshold.

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## EXAMPLE of Narrative for New Investment Report

### EXAMPLE of a WIRELESS COMPANY

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
A	B	C	D	E	F=C x D
20 miles West of Oakley serving USF areas: Levant, Winona, and Russell Springs.	New tower and fiber trunking.	\$300,000	70%	[1]	\$210,000
Wichita - Serves all customers in Kansas.	Switch Software Upgrade.	\$250,000	25%	[2]	\$50,000
<b>TOTAL</b>		<b>\$550,000</b>			<b>\$260,000</b>

#### NOTES

[1] Percent of the service area that is USF supported on geography served.

[2] Percent of switch that is USF supported based on lines served.

### EXAMPLE of a WIRELINE COMPANY

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
A	B	C	D	E	F=C x D
Buffalo, Quincy, Toronto	Replaced OSP with digital line carrier and fiber feeder	\$1,250,000	100%	[1]	\$1,250,000
Eureka thru Hamilton, Quincy, Yates Center, Chanute, Fredonia, Fall River & serves USF areas: Buffalo, Toronto, Altoona, Benedict, and Coyville.	Fiber ring from remote terminals to remote switch in Eureka.	\$800,000	50%	[2]	\$400,000
<b>TOTAL</b>		<b>\$2,050,000</b>			<b>\$1,650,000</b>

#### NOTES

[1] All of the exchanges in this project are USF supported.

[2] Percent of lines served by the fiber ring in the USF supported exchanges.

The objective of this report is to identify that new investment is being spent to benefit supported areas. Listing individual exchanges that will benefit will help meet this purpose.

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b. Threshold - For companies spending less than \$10M in new projects in Kansas, use \$200,000 as the project threshold. For companies spending \$10M or more, use \$500,000 as the project threshold. It is acceptable to provide more detail than the threshold requires if it helps identify which supported areas are receiving benefit.

**5. Attachment 5 - Report on the Use of KUSF Support Funding in SWBT Exchanges**

The information and instructions for Attachment 5 are the same as Attachment 4 except that the purpose is to describe the use of KUSF Support in SWBT exchanges. ETCs that receive KUSF for SWBT exchanges should complete this report.

Additional questions on the allocation process may be referred to the KCC Staff, see contact number at the top of these instructions.

**6. Attachment 6 – Annual Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT.**

Provide the information as requested on the attachment and attach additional pages, as necessary. All ETCs must complete Questions 1-6. Only Competitive ETCs need to complete Question 7. **If the answer to a question is zero, please report zero and not N/A.**



## CERTIFICATE OF SERVICE

19-GIMT-399-GIT

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