

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

In the Matter of An Investigation to Determine the Affordable Local Service Rates for Rate-of-Return Regulated Carriers and the Annual Assessment Rate for the Twenty-Ninth Year of the Kansas Universal Service Fund, Effective March 1, 2025.

Docket No. 25-GIMT-141-GIT

**NOTICE OF UPDATE OF TRAFFIC FACTORS
UTILIZED BY T-MOBILE CENTRAL LLC**

COMES NOW T-Mobile Central, LLC ("T-Mobile"), by its undersigned counsel, to notify the State Corporation Commission of the State of Kansas ("Commission") of updated information concerning the traffic factors used by T-Mobile to allocate revenue to the intrastate jurisdiction for purposes of the Kansas Universal Service Fund ("KUSF"). For its Notice, T-Mobile states as follows:

1. Pursuant to K.S.A. 66-2008(a), the Commission requires "every telecommunications carrier, telecommunications public utility and wireless telecommunications service provider that provides intrastate telecommunications service and, to the extent not prohibited by federal law, every provider of interconnected VoIP service, as defined by 47 C.F.R. 9.3 (October 1, 2005), to contribute to the [Kansas Universal Service Fund] on an equitable and nondiscriminatory basis." On December 27, 1996, in Docket No. 94-GIMT-478-GIT, the Commission stated the contribution would be an annual assessment on each provider's intrastate retail revenues.

2. In its January 24, 2012 *Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing* ("Order") in Docket No. 12-GIMT-168-GIT ("12-168 Docket"), the Commission directed all wireless carriers and interconnected

VoIP providers that use the direct assignment or traffic study methodology to update their factors at least annually.

3. On February 1, 2012, the Commission issued its *Amended Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing* (“Amended Order”) in the 12-168 Docket. In its Amended Order, among other things, the Commission adopted Staff’s recommendation that companies provide an affidavit verifying that the same methodology and the inverse traffic factors are used for federal Universal Service Fund purposes. Companies are required to provide updates to their methodology and allocation factors at least annually, even if such pleading verifies that no change has occurred. Amended Order at ¶¶ 8-9.

4. In accordance with the Commission’s above-referenced orders in the 12-168 Docket, Assurance Wireless files this Notice and attached Confidential Affidavit of John Barnes, Senior Director -- Tax for T-Mobile USA, Inc., setting out T-Mobile’s intrastate factor used for KUSF (and inversely, federal USF) purposes, for KUSF Year 29, commencing March 1, 2025 and ending February 28, 2026.

WHEREFORE, T-Mobile respectfully submits respectfully submits its Notice of Update of Traffic Factor and Confidential Affidavit of John Barnes.

Respectfully submitted,

/s/ Mark P. Johnson

Mark P. Johnson, KS #22289
Dentons US LLP
4520 Main Street, #1100
Kansas City, MO 64111
Direct: (816) 460-2424
Cell: (816) 456-5044

Fax: (816) 531-7545
Email: mark.johnson@dentons.com

Attorney for T-Mobile Central LLC

March 11, 2025

VERIFICATION

STATE OF MISSOURI)
)
) ss:
COUNTY OF JACKSON)

I, Mark P. Johnson, verify under penalty of perjury that I have caused the foregoing Notice of Update of Traffic Factors Utilized by T-Mobile Central LLC (“T-Mobile) to be prepared on behalf of T-Mobile, and that the contents thereof are true and correct to the best of my knowledge, information and belief.



Mark P. Johnson

March 11, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Annual Notice of Update of Traffic Factor Utilized by T-Mobile Central LLC was served via electronic mail this 11th day of March, 2025, to the parties appearing on the Commission’s service list as last modified on September 18, 2024.

/s/ Mark P. Johnson

Mark P. Johnson

BRUCE A. NEY, AVP -SENIOR LEGAL COUNSEL
AT&T SERVICES, INC.
816 CONGRESS AVE
SUITE 1100
AUSTIN, TX 78701-2471
bruce.ney@att.com

PAMELA SHERWOOD, Senior Regulatory and Compliance Counsel
BRIGHTSPEED OF KANSAS, LLC
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
pamela.sherwood@brightspeed.com

JOHN R. IDOUX, DIRECTOR KANSAS GOVERNMENTAL AFFAIRS
BRIGHTSPEED OF EASTERN KANSAS, LLC
1120 TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
john.idoux@brightspeed.com

JOHN LaPENTA, COUNSEL - STATE REGULATORY
BRIGHTSPEED OF SOUTHERN KANSAS, INC
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
JOHN.LAPENTA@BRIGHTSPEED.COM

JOSEPH R. ASTRAB, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Joseph.Astrab@ks.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Todd.Love@ks.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Shonda.Rabb@ks.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Della.Smith@ks.gov

MOLLY E MORGAN, ATTORNEY

FOULSTON SIEFKIN LLP
1551 N. Waterfront Parkway
Suite 100
Wichita, KS 67206
mmorgan@foulston.com

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
jzakoura@foulston.com

MARK DOTY
GLEASON & DOTY CHTD
401 S MAIN ST STE 10
PO BOX 490
OTTAWA, KS 66067-0490
DOTY.MARK@GMAIL.COM

COLLEEN JAMISON
JAMISON LAW, LLC
P O BOX 128
TECUMSEH, KS 66542
Colleen.Jamison@jamisonlaw.legal

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Ahsan.Latif@ks.gov

WENDY HARPER, USF SERVICES MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
wendy.harper@vantagepnt.com