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July 2, 2018

Ms. Lynn M. Retz  
Secretary to the Commission  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Re: Docket 18-GIMT-394-GIT

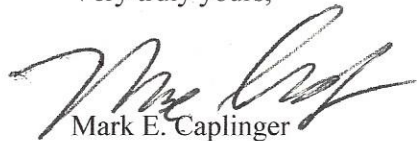
Dear Ms. Retz,

We are enclosing the FCC Section 254(e) certification form for Federal Universal Service Support in the above referenced docket for The Southern Kansas Telephone Company, Inc. (SKT).

We are filing the Rate Floor Data, along with Attachments 2a and 4 proprietary and confidential under seal. SKT believes that the information contained in the Rate Floor Data, Attachment 2a, and Attachment 4 is of such competitive sensitivity that its disclosure to any person other than SKT, the Commission, and Staff is prohibited by K.S.A. 66-1220(a). Disclosure of trade secrets and confidential information to any person, including parties to this proceeding, is prohibited unless the Commission finds the disclosure is warranted, after considering all of the factors in that statute. The carrier believes that disclosure of the information contained in the Rate Floor Data, Attachment 2a, and Attachment 4 would have a significant and adverse impact on its competitive stance regarding existing or potential competing entities including wireless carriers, competitive local exchange carriers, and incumbent local exchange carriers. Regulatorily mandated disclosure of any or all of the subject information would create a competitive bias in favor of any actual or potential competitor not required to provide comparable information, reducing or eliminating any benefit to consumers otherwise resulting from unbiased competition and damaging the submitting company's ability to engage in fair competition.

Please feel free to give me a call if you have any questions.

Very truly yours,



Mark E. Caplinger  
Attorney for The Southern  
Kansas Telephone Co. Inc.

Enclosures  
MEC/njm  
Cc: Kendall Mikesell  
William McVey

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Chair Shari Feist Albrecht  
Commissioner Jay Scott Emler  
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 President of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. (Company/Cooperative) to the statements made in this certification.

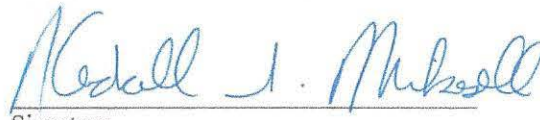
2. The Southern Kansas Telephone Company, Inc. (Company/Cooperative) was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997 and KUSF support purposes in Docket No. 98-GIMT-241-GIT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

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by The Southern Kansas Telephone Company, Inc. (Company/Cooperative) 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

Kendall S. Mikesell

Printed/Typed Name

Executed on May 15, 2018.

Email address: [kendall.mikesell@sktcompanies.com](mailto:kendall.mikesell@sktcompanies.com)

## 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
4-21-2017 3:00 am to 5:00 am	SKT's core router failed, causing a loss of services. Cisco technicians and SKT staff reviewed the issues and were able to correct the problem by rebooting equipment.	Telephone, and 911 services	Atlanta, Beaumont, Burden, Cambridge, Dexter, Elk Falls, Grenola, Latham, Longton, Piedmont, Reece, and Rosalia, Kansas	SKT updated the core router operating system software to prevent this issue from occurring in the future. This software will be updated biannually going forward.	3165

(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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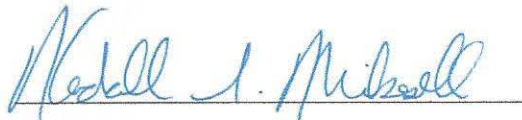
4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. **Please complete the following, as applicable to your company:**

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is President of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that The Southern Kansas Telephone Company, Inc. (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 May 15, 2018 (date).



Signature

Kendall S. Mikesell

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).

N/A  
Signature

N/A

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 President of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that The Southern Kansas Telephone Company, Inc. (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 May 15, 2018 (date).



Signature

Kendall S. Mikesell

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
Arkansas City Traveler	Newspaper	Burden and Dexter, Kansas	June 7, 2017
The Times-Sentinel	Newspaper	Clearwater and Viola, Kansas	June 8, 2017
Eureka Herald	Newspaper	Beaumont, Piedmont, Reece, and Rosalia, Kansas	June 7, 2017
Cowley Courier Traveler	Newspaper	Atlanta, Burden, Cambridge, and Dexter, Kansas	June 3, 2017
Prairie Star	Newspaper	Atlanta, Burden, Cambridge, Elk Falls, Grenola, Latham, and Longton, Kansas	May 31, 2017
SKT Clearwater and Viola Telephone Directory	Printed telephone directory	Clearwater and Viola, Kansas	May 1, 2017
SKT Southeast Kansas Telephone Directory	Printed telephone directory	Atlanta, Beaumont, Burden, Cambridge, Dexter, Elk Falls, Grenola, Latham, Longton, Piedmont, Reece, and Rosalia, Kansas	December 1, 2017

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.

N/A

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**COMPARABLE LOCAL USAGE PLAN 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 offers a local usage plan comparable to that of the incumbent. I am binding  
\_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/  
Cooperative) offers a local usage plan comparable to that of the incumbent.

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).

N/A \_\_\_\_\_

Signature

N/A \_\_\_\_\_

Printed/Typed Name