

COLLEEN R. JAMISON
JAMISON LAW, LLC

June 30, 2025

Celeste Chaney-Tucker
Executive Director, Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604

RE: S&A Telephone Company, LLC
Docket No. 25-GIMT-332-GIT
254(e) certifications

Dear Ms. Chaney-Tucker:

On behalf of S&A Telephone Company, LLC, attached please find for filing in Docket No. 25-GIMT-332-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 30, 2025 (Attachments 1, 2a, 4, and 5).

In this filing, the entirety of Attachments 2a and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Cordially yours,

Colleen R. Jamison

Colleen R. Jamison
JAMISON LAW, LLC

Encl.

cc: Derek O'Borsky

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 25-GIMT-332-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 Federal and Kansas Support Received)

1. My title is CFO of S&A Telephone Company (Company/Cooperative). In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding S&A Telephone Company (Company/Cooperative) to the statements made in this certification.

2. S&A Telephone Company (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) 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 all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by S&A Telephone Company

Docket No. 25-GIMT-332-GIT
Attachment 1

(Company/Cooperative) was used in the proceeding calendar year 2024 and will be used in the new calendar year 2026 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal 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



Tyson Begly

Printed/Typed Name

Executed on 6/20/2025 date.

Email address: tyson.begly@highlinefast.com

Company Name: S&A Telephone Company

DATA YEAR: 2024

	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	317
2. Category 1.3 Loops	(070)	314
3. Consumer Broadband-only Loops	(090)	207

INVESTMENT Remove all BLS only investments**

1. Plant Accounts		
a. Acct 2001 - Telephone Plant in Service	(160)	\$ 9,081,533
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	248,445
b. Acct 2220 - Operator System Equipment	(235)	1,277,277
c. Acct 2230 - Central Office Transmission	(240)	2,777,277
d. Total Central Office Equip	(245)	4,293,000
e. Circuit Equip Cat 4.13	(250)	1,333,333
f. Acct 2410 - Cable & Wire Facilities Total	(255)	5,626,333
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 - Tangible Assets	(800)	1,000,000
Acct. 2680 (2230) - Central Office Transmission	(805)	1,000,000
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	1,000,000
Acct. 2680 (2410) Cable & Wire Facilities	(815)	1,000,000
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	1,000,000
Acct. 6560 (2680) Dep & Amort	(830)	1,000,000
PART 36 - COST STUDY DATA		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	1,000,000
2. Cost Study Avg C&WF Cat 1	(710)	1,000,000
3. C&WF CAT 1 Factor		55.56%
4. COE CAT 4.13 Factor		9.09%
5. Switching Factor		1.00%

For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year

INVESTMENT, EXPENSE AND TAXES**

Remove all BLS only amounts

	LINE	REGULATED AMOUNT
1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	2,777,277
b. Total Central Office Equip	(245)	47,116
c. Acct 2410 - Cable & Wire Facilities Total	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	
b. Acct 6110 - Network Support Benefits	(340)	
c. Acct 6110 - Network Support Rents	(345)	
d. Acct 6120 - General Support Total	(350)	
e. Acct 6120 - General Support Benefits	(355)	
f. Acct 6120 - General Support Rents	(360)	

Company Name: S&A Telephone Company

DATA YEAR: **2024**

g. Acct 6210 - Central Office Switching Total	(365)
h. Acct 6210 - Central Office Switching Benefits	(370)
i. Acct 6210 - Central Office Switching Rents	(375)
j. Acct 6220 - Operator Systems Total	(380)
k. Acct 6220 - Operator Systems Benefits	(385)
l. Acct 6220 - Operator Systems Rents	(390)
m. Acct 6230 - Central Office Transmission Total	(395)
n. Acct 6230 - Central Office Transmission Benefits	(400)
o. Acct 6230 - Central Office Transmission Rents	(405)
p. Total - Central Office (Acct. 6210 - 6230)	(410)
q. Acct 6410 - Cable & Wire Facilities	(430)
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)
s. Acct 6410 - Cable & Wire Facilities Rents	(440)
t. Total Plant Specific Expense (Accts. 6110 - 6410)	(445)
 3. Expenses - Plant Non Specific Exp	
a. Acct 6530 - Network Operations	(450)
b. Acct 6530 - Network Operations Benefits	(455)
 4. Depreciation & Amortization Exp	
a. Acct 6560 (#2210) - Central Office Switching	(510)
b. Acct 6560 (#2220) - Operator Systems	(515)
c. Acct 6560 (#2230) - Central Office Transmission	(520)
d. Acct 6560 (#2210-2230) - Total	(525)
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)
 5. Corporate Operating Expenses	
a. Acct 6710 - Executive & Planning	(535)
b. Acct 6710 - Executive & Planning Benefits	(540)
c. Acct 6720 - General Admin	(550)
d. Acct 6720 - General Admin Benefits	(555)
e.Total Corporate Operating Expense	
(line 535+550)	(565)
 6. Other Expenses and Revenues	
a. Benefits Portion	(600)
b. Rents Portion	(610)
Total Expenses (Excluding Depreciation)	
7. Operating Taxes	
a. Acct 7200	(650)

Test for use of FUSF & KUSF

CAPITAL:

1. Category 1 C&WF
2. Category 4.13 COE and Switching

MAINTENANCE:

3. CWF - MAINT. EXP.
4. COE - MAINT. SW
5. COE - MAINT-OP SYSTEM
6. COE - MAINT. - TRANS.

Company Name: S&A Telephone Company

DATA YEAR: 2024

7. CWF - NETWORK SUPPORT
8. COE - NETWORK SUPPORT

9. CWF GENERAL SUPPORT
10. COE GENERAL SUPPORT

20. CWF NETWORK OPERATION
21. COE NETWORK OPERATION

22. CWF EXEC. & PLANNING
23. COE EXEC. & PLANNING

24. CWF GENERAL ADMIN.
25. COE GENERAL ADMIN.

26. CWF OPERATING TAXES
27. COE OPERATING TAXES

28. CWF BENEFITS - TTL OPER EXP
29. COE BENEFITS - TTL OPER EXP

30. CWF RENTS - TTL OPER EXP
31. COE RENTS - TTL OPER EXP

A. Total Cash Expenditures Associated with USF

B. Certified Federal USF Receipts:

B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)
B2. Safety Valve Support for acquired Exch. (SVS)
B3. Alternative Connect America Model (ACAM/ACAM II)
B4. Connect America Fund, Phase I, II (CAF I/CAF II)
B5. Rural Digital Opportunity Fund, Phase I (RDOF I)
B6. Rural Broadband Experiment (RBE)

B7. Total Federal USF Receipts

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

D. Total FUSF and KUSF Receipts

E. Do Expenditures Exceed FUSF Receipts?

No

Amount Expenditures Exceed Certified FUSF

(negative number means FUSF exceeds Expenditures)

F. Do Expenditures Exceed FUSF & KUSF Receipts?

No

Amount Expenditures Exceed Certified FUSF & KUSF

(negative number means FUSF & KUSF exceeds Expenditures)

Please provide the following information:

Contact: Tyson Begly

Title: CFO

Phone No.: 404-518-6380

E-Mail: tyson.begly@highlinefast.com

REDACTED

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

**25-GIMT-332-GIT
Attachment 2a**

Company Name: *S&A Telephone Company*

DATA YEAR: *2024*

Narrative Report for New Investments

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

Company Name: S&A TELEPHONE COMPANY

Data Year: **2024**

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas F= C x D
A	B	C	D	E	F= C x D
Acct 2123-100	Line Extension/Bldg.	\$ 3,399	100%		\$ 3,399 - CAT 2018-0
Acct 2123	Storm Security Upgrade	\$ 24,000	100%		\$ 24,000 - CAT 2018-0
Acct 2233	Full Redundant TMS System	\$ 21,005	100%		\$ 21,005 - CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Acct 2123					- CAT 2018-0
Subtotal					
Total		\$ 68,665			\$ 68,665

NOTES:

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255). For CETCs, this amount should match the

Contact: Josh Reece Phone No.: 620-528-7002
Title: Operations Manager E-Mail: josh.reece@highlinefast.com

Annual ETC Certification of Requirements Imposed by the
Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 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 C.F.R. § 4.5(e)? **(Yes/No)** . **IF YES, PLEASE COMPLETE THE FOLLOWING:**

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	
5/9/2024 11:00	Lyon county Fiber cut	Data and Voice	Lyon County	Field Team was in a splice case. Original contractor who spliced it did not protect fiber correctly; team corrected splicing	86
5/13/2024 5:43	Scranton GPON	Data and Voice	Scranton	Reset GPON Card after Lightning Strike	18
5/18/2024 8:23	Kansas Power event/rectifier issues	Data and Voice	Lyon County	Commercial power outage followed by a faulty breaker; breaker was repaired	93
7/31/2024 22:10	KS/Scranton/S06x-KS-OL-CX-01-01 Down	Data and Voice	Scranton	Commercial power outage due to weather, eventually depleted backup batteries.	10

(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.

No Requests that were unable to be fulfilled

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

No Filed complaints this calendar year.

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 Chief Technology Officer of S&A Telephone Company (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 S&A Telephone Company (Company) to the statements made in this certification.

2. By this affidavit, I certify that S&A Telephone Company (Company) 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 June 29th, 2024 (date).

Matt Hayes
Matt Hayes (Jun 23, 2025 12:06 EDT)
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 Chief Technology Officer of S&A Telephone Company (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 S&A Telephone
Company (Company) to the statements made in this certification..

2. By this affidavit, I certify that S&A Telephone Company (Company) 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 June 29th, 2024(date).

Matt Hayes

Matt Hayes (Jun 23, 2025 12:06 EDT)

Signature

Print / Typed Name

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 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 Chief Technology Officer of S&A Telephone Company (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 S&A Telephone Company (Company) to the statements made in this certification.

2. By this affidavit, I certify that I am binding S&A Telephone Company (Company) 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 June 29th, 2024(date).

Matt Hayes

Matt Hayes (Jun 23, 2025 12:06 EDT)

Signature

Printed / Typed Name

24-GIMT-612-GIT
Attachment 5

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline 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
All-American Publishing	Calendar	Lyon County (Allen Exchange)	Year Round	
Law Enforcement Support L.L.C.	Calendar	Lyon County (Allen Exchange)	Year Round	
NLC Elementary School Activities USD 251				
Twin Lakes Water Festival				
City of Admire	Scoreboard Sign	Lyon County (Allen Exchange)	Year Round	
Admire Community Pride				
Osage County Fair Association	Brochures & T-shirts	Lyon County (Allen Exchange)	Year Round	
City of Scranton	Signs	Lyon County (Allen Exchange)	07/03/24	
Carl's Tire and Lube Shop Christmas Celebration	Newsletter	Lyon County (Allen Exchange)	07/03/24	
Flint Hills Beef Fest	Brochures	Osage County (Scranton Exchange)	Year Round	
Royal Publishing	Poster	Osage County (Scranton Exchange)	05/03/24	
NHHS Booster Club				
NHHS After Prom	Brochures, Website, Placemats	Lyon & Osage Counties (Entire Company)	10/21/24	

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

N/A - S&A Telephone Company is an ILEC