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November 15, 2019

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

Re: KCC Docket No. 19-SWBT-021-KSF

Dear Ms. Retz:

Attached you will find the Compliance Status Report of Southwestern Bell Telephone Company d/b/a AT&T Kansas.

Sincerely,

Bruce A. Ney
AVP—Senior Legal Counsel

Attachment

cc: Parties of Record

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

In the Matter of the Audit of Southwestern Bell)	
Company by the Kansas Universal Service Fund)	
(KUSF) Administrator Pursuant to K.S.A. 2017)	Docket No. 19-SWBT-021-KSF
Supp. 66-2010(b) for KUSF Operating Year 2,)	
Fiscal Year March 2017 – February 2018.)	

**COMPLIANCE STATUS REPORT OF
SOUTHWESTERN BELL TELEPHONE COMPANY D/B/A AT&T KANSAS**

COMES NOW Southwestern Bell Telephone Company d/b/a AT&T Kansas ("AT&T Kansas"), and files this Status Report, pursuant to the commitment made in its voluntarily filed Compliance Status Report of September 10, 2019, as well as the Commissions' Compliance Order issued October 8, 2019¹, in the above captioned proceeding. The status of AT&T Kansas' continuing efforts to comply with the Commission's *Audit Order*² in the above captioned proceeding is as follows:

1. On Thursday, November 7, representatives of AT&T Kansas and the Commission Staff participated in a telephone conference call to discuss issues associated with the refund plan AT&T Kansas will file with the Commission for approval as follows:

a. The ECBR billing issue initially identified by AT&T Kansas involving components of its Uniform Service Order Code (USOC) and billing systems had a correction to the identified ECBR billing process on June 11, 2019. AT&T Kansas

¹ Compliance Order, Docket No. 19-SWBT-021-KSF, dated Oct. 8, 2019 [hereinafter the "*Compliance Order*"].

² Order Adopting Audit Report, Docket No. 19-SWBT-021-KSF, dated July 9, 2019 [hereinafter the "*Audit Order*"].

expects approximately \$902,000 will be refunded to or for approximately 26,225 external customer billing accounts for the period of March 2016 thru June 2019. AT&T Kansas and Staff reached agreement that approximately \$791,000 of the total ECBR refund amount will be refunded via a direct credit to active customer billing accounts. Based upon the discussions, AT&T Kansas is exploring additional customer information concerning refunding the approximately \$110,000 collected from now inactive accounts and will report back to Staff for further discussions.

b. The second refund issue involves the subsequently discovered discrepancy between two USOC accounts involving non-assessable revenues and assessed/billed KUSF surcharges for certain 911-related, non-telecommunications services. A correction to the billing process was implemented October 11, 2019. It is necessary for a full billing cycle to complete to ensure the correction was successful. AT&T Kansas has explained to the Staff that it is working to capture and verify customer specific data for making the necessary refund. AT&T Kansas now estimates the total amount of possible refunds totals approximately \$905,000. AT&T Kansas informed Staff that it believes the entire amount of the 911-related refund can be made directly to those current customers from which it was collected.

2. Following on the discussions with Staff, AT&T Kansas is taking this opportunity to clarify its prior *October Compliance Report* concerning the discovery of a VoIP surcharge account for which the amounts AT&T Kansas billed/surcharged customers had not been previously reported on the appropriate CRWs, but the VoIP revenues were properly included in AT&T's reported KUSF assessable base.³ As a

³ Compliance Status Report of Southwestern Bell Telephone Company d/b/a AT&T Kansas, Docket No. 19-SWBT-021-KSF, filed Oct. 10, 2019 at ¶ 5.d. [hereinafter the "*October Compliance Report*"].

result, revised KUSF worksheet filings will be made for the period from March 2016 forward to reflect the amount of KUSF billed/surcharges. AT&T Kansas has concluded there are no refunds due to customers and no additional funds due the KUSF as a result of the reporting error.

3. As AT&T Kansas has verbally informed the Staff, it has been and continues to work diligently to comply with the Commission's Orders in this proceeding. It also has been and remains AT&T Kansas' intention, rather than to make piecemeal filings, to make a single, complete and comprehensive refund and payment plan. In addition, it is AT&T Kansas' intention to file required True-up Reports, taking into account all inadvertent over-collection, underpayment or reporting errors, as previously directed by the Commission upon the verifiable correction of the billing system and processes to remedy the previously identified and any ongoing over-collection issues. Further AT&T Kansas has committed to continue working directly with Staff on the issues in this proceeding.

Respectfully submitted,

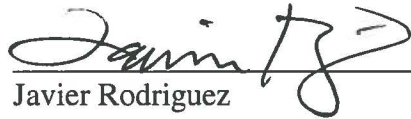
A handwritten signature in blue ink, appearing to read "Bruce A. Ney", is written over a horizontal line.

BRUCE A. NEY (KS#15554)
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Company d/b/a AT&T Kansas

VERIFICATION

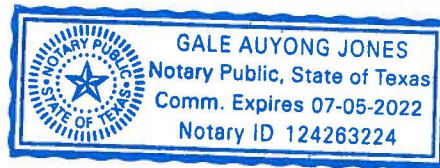
I, Javier Rodriguez, of lawful age, and being first duly sworn, now state: I am Area Manager-Regulatory Relations, and have read AT&T Kansas' Compliance Status Report for November 2019 to the Kansas Corporation Commission in AT&T Kansas' Kansas Universal Service Fund Audit Proceeding, Docket No. 19-SWBT-021-KSF, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.


Javier Rodriguez

Subscribed and sworn to before me this 15th day of November, 2019.


Notary Public

My appointment expires: 7/5/22



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Compliance Status Report of Southwestern Bell Telephone Company d/b/a AT&T Kansas was electronically served this 15th day of November 2019 to:

Walker Hendrix
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Bruce A. Ney