

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

Before Commissioners: Mark Sievers, Chairman
Thomas E. Wright
Shari Feist Albrecht

In the Matter of the Application of Boomerang)
Wireless, LLC for Designation as an Eligible) Docket No. 13-BOWZ-121-ETC
Telecommunications Carrier on a Wireless)
Basis (Low Income Only).)

ORDER GRANTING ELIGIBLE TELECOMMUNICATIONS CARRIER STATUS

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and determination. Having examined its files and record, and being duly advised in the premises, the Commission finds and concludes as follows:

1. On July 27, 2012, Boomerang Wireless, LLC d/b/a enTouch Wireless (Boomerang) filed an Application requesting designation as a wireless Eligible Telecommunications Carrier (ETC) for low-income Lifeline-Only Federal Universal Service Fund (FUSF) support purposes in the State of Kansas. On August 10, 2012, Boomerang filed a copy of the company's Revised Compliance Plan, as submitted to the Federal Communications Commission (FCC), and on January 31, 2013, filed an Amendment to its Application. Boomerang requests ETC designation to provide service to qualifying consumers in specific Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T Kansas) and specific Rural Local Exchange Carrier (RLEC) exchanges.

2. In order for a carrier to receive low-income Lifeline wireless ETC designation from the Commission, the requesting carrier must make showings required under federal law. Pursuant to 47 U.S.C. §214(e)(1)-(2), §254(c), and 47 C.F.R. §54.101(a), the carrier must make the following showings:

- (a). The carrier will offer the services supported by federal universal service support mechanisms under 47 U.S.C. §254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another ETC) throughout the service area for which designation is received.¹
- (b). The carrier will advertise the availability of such service and the charges therefor using media of general distribution.
- (c). Designation would be consistent with the public interest, convenience, and necessity.²

3. Pursuant to FCC Orders, Commission Orders, and Kansas law, the carrier

requesting low-income Lifeline wireless ETC designation must also show:

- (a). Lifeline customers will be able to apply the Lifeline discount to any calling plan offered by the carrier.³
- (b). The carrier will use the Kansas Lifeline Credit Application to enroll eligible Customers in the Lifeline Program or their own credit form which must contain all the data found in the Kansas Lifeline Credit Application.⁴
- (c). The carrier is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.⁵
- (d). The carrier has received approval of its Compliance Plan with the FCC (if Applicable).
- (e). The carrier undertakes efforts to eliminate waste, fraud, and abuse in the Lifeline Program.
- (f). The carrier, in its advertising, will use "meaningful language so that consumers

¹ The supported services codified in 47 C.F.R. §54.101(a), read as follows:

Voice Telephony services shall be supported by federal universal service support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

² See Docket No. 04-RCCT-338-ETC, Order No. 14 Granting ETC Designation and Addressing Additional Issues, issued September 30, 2004, ¶29. See also 47 C.F.R. §214(e)(2).

³ See Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designation of Eligible Telecommunications Carriers, issued October 2, 2006, ¶77.

⁴ See Docket No. 10-GIMT-658-GIT, Order issued March 27, 2012, ordering ¶B. See also Docket No. 00-GIMT-910-GIT, Order issued January 21, 2003, ordering ¶A.

⁵ *Id.* (10-658), Order issued June 21, 2012, ordering ¶A; See also 47 C.F.R. §54.201 and §54.202.

will understand what they can expect from an ETC", and include contact information for the Commission's Office of Public Affairs and Consumer Protection (PACP), the Kansas Corporation Commission, and the Kansas Relay Center for the hearing or speech impaired.

- (g). The carrier has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes.⁶
- (h). The carrier is properly registered with the Kansas Secretary of State's office.
- (i). The carrier will provide service throughout its designated service area to all customers making a reasonable request for service.
- (j). The carrier will comply with all applicable federal and state laws, rules, regulations, and orders. The carrier will inform the Commission of any changes in service made to comply with updated laws, rules, regulations, and orders.

4. On March 6, 2013, the Commission Staff (Staff) submitted its Report and Recommendation dated February 22, 2013, recommending Commission approval of Boomerang's Application, and designation of the company as an ETC for FUSF low-income purposes in the requested exchanges and study areas detailed in Exhibit A to Staff's Report and Recommendation, which include the following:

- (a). Southwestern Bell Telephone Company d/b/a AT&T Kansas exchanges;
- (b). Study Areas of Blue Valley Tele-Communications, Inc., Cunningham Telephone Company, Inc., Haviland Telephone Company, Inc., Home Telephone Company, Inc., Kan-Okla Telephone Association, La Harpe Telephone Co., Inc., MoKan Dial, Inc., Moundridge Telephone Company, Peoples Telecommunications, LLC, Rainbow Telecommunications Association, Inc., S&A Telephone Company, Inc., The Southern Kansas Telephone Company, Inc., Wamego Telecommunications Company, Inc., Wheat State Telephone, Inc., Wilson Telephone Company, Inc., and Zenda Telephone Company, Inc.; and
- (c). Rural Exchanges of Sunflower/Bluestem Telephone Company, Craw-Kan Telephone Cooperative, Inc., Golden Belt Telephone Association, Inc., J.B.N. Telephone Company, Inc., Madison Telephone, LLC, Totah Communications, Inc., Tri-County Telephone Association, Inc., Twin Valley Telephone, Inc., and United Telephone Companies of Kansas d/b/a CenturyLink.

⁶ See Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designation of Eligible Telecommunications Carriers, issued October 2, 2006, ¶34.

Staff's Report and Recommendation reflects a very thorough examination of Boomerang's Application and accompanying exhibits and presents a detailed analysis of all aspects of the Application. A summary of Staff's findings follows in this Order. For a detailed account of Staff's examination of Boomerang's Application and evidentiary showings, reference is made to Staff's Report and Recommendation.

5. Staff's findings include the following: (i) Boomerang offers the services and functionalities supported by the federal universal service support mechanisms in the requested service area, (ii) Boomerang will properly advertise its services with meaningful language and include required contact information, (iii) Boomerang is technically and financially capable of providing Lifeline service and the company's Kansas Lifeline Credit Application meets the Kansas Lifeline program parameters, (iv) Boomerang's Compliance Plan has been approved by the FCC and Boomerang has demonstrated its efforts to eliminate waste, fraud, and abuse in the Lifeline program, (v) Boomerang, is a foreign limited liability company, properly registered with the Kansas Secretary of State's office, whose status with that office is *active and in good standing*, (vi) Boomerang has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes, and (vii) designation of Boomerang as an ETC would be consistent with the public interest, convenience, and necessity.

6. Concluding its analysis, Staff recommends approval of Boomerang's request for designation as an ETC for FUSF low-income Lifeline-Only support purposes in the requested exchanges and study areas identified in subparagraphs 4. (a), (b), and (c) above. Staff notes that should the Commission approve the request for redefinition of the rural service areas identified in subparagraph 4. (c) above to the exchange level, Boomerang will not need to seek and receive

concurrence from the FCC prior to receiving FUSF low-income support for such areas, as these areas have already received prior FCC approval. Staff further adds that Boomerang should be advised of the following:

- (a). That support received must be used for its intended purpose each year and the company and its parent, HH Ventures, must comply with other certification requirements developed by the Commission in Docket No. 05-GIMT-112-GIT and in any future proceedings.
- (b). That any future decisions made by the Commission resulting from the October 2, 2006 Order, issued in Docket No. 06-GIMT-446-GIT, and any future decisions made by the Commission regarding additional ETC requirements, may impact the company and Boomerang may be required to follow these requirements in order to continue receiving support.
- (c). That reporting and payment of KUSF assessments and any other reporting requirements imposed by the Commission must be done in a timely manner in order to retain ETC designation.

The Commission notes Staff's discussion of Boomerang's parent company, HH Ventures' past delinquencies in KUSF reporting and payments. While Staff confirms that these KUSF reporting and payment obligations are now current, the Commission re-emphasizes to the applicant in this matter, Boomerang, the critical importance of timely KUSF reporting and payment in retaining ETC designation and avoiding revocation of such designation.

7. The Commission adopts Staff's analysis and recommendations of February 22, 2012, as stated in its Report and Recommendation, which is attached hereto and made a part hereof, and finds that Boomerang's Application is reasonable, in the public interest, and should be granted. The Commission further finds that Boomerang should be designated as an ETC for FUSF low-income Lifeline-Only support purposes in the exchanges and study areas identified in subparagraphs 4. (a), (b), and (c) above.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. Boomerang Wireless, LLC's Application filed July 27, 2012, as amended January 31, 2013, is hereby granted and Boomerang is hereby designated an Eligible Telecommunications Carrier (ETC) for Federal Universal Service Fund (FUSF) low-income Lifeline-Only support purposes in the exchanges and study areas identified in subparagraphs 4. (a), (b), and (c) above. Boomerang is further advised that its operations and service in the future may be affected by the conditions set forth in subparagraphs 6. (a), (b), and (c) above.


B. The parties have fifteen (15) days, plus three (3) days if service of this Order is by mail, from the date this order was served in which to petition the Commission for reconsideration of any issue or issues decided herein. K.S.A. 66-118b; K.S.A. 2012 Supp. 77-529.

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

BY THE COMMISSION IT IS SO ORDERED.

Sievers, Chmn.; Wright, Com.; Albrecht, Com.

Dated: MAR 13 2013


ORDER MAILED MAR 14 2013
Patrice Petersen-Klein
Executive Director

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Mark Sievers, Chairman
Thomas E. Wright, Commissioner
Shari Feist Albrecht, Commissioner

Sam Brownback, Governor

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Chairman Mark Sievers
Commissioner Thomas E. Wright
Commissioner Shari Feist Albrecht

FROM: Paula Artzer, Senior Telecommunications Analyst
Christine Aarnes, Chief of Telecommunications
Jeff McClanahan, Director of Utilities

STATE CORPORATION
COMMISSION

FEB 27 2013

PATRICE PETERSEN-KLEIN
EXECUTIVE DIRECTOR

DATE: February 22, 2013

DATE SUBMITTED TO EXECUTIVE DIRECTOR: 2/27/13

DATE SUBMITTED TO LEGAL: 2-28-13

DATE SUBMITTED TO COMMISSIONERS: 3/6/13

SUBJECT: 13-BOWZ-121-ETC

In the Matter of the Application of Boomerang Wireless, LLC for Designation as an Eligible Telecommunications Carrier on a Wireless Basis (Low-Income Only)

EXECUTIVE SUMMARY:

Boomerang Wireless, LLC d/b/a enTouch Wireless (Boomerang) has filed an Application for designation as a wireless Eligible Telecommunications Carrier (ETC) in the state of Kansas. Boomerang provides pre-paid wireless telecommunications service to consumers by using the Sprint Spectrum, L.P. (Sprint) and Verizon networks on a wholesale basis.

Boomerang seeks ETC designation to provide Lifeline service to qualifying consumers in specific Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T Kansas) and specific Rural Local Exchange Carrier (RLEC) exchanges. Staff recommends approval of Boomerang's request for designation as a wireless Lifeline-Only ETC for Federal Universal Service Fund (FUSF) purposes in the requested service areas.

BACKGROUND:

On July 27, 2012, Boomerang filed an Application requesting designation as an ETC for the purpose of receiving low-income Lifeline FUSF support within the state of Kansas. Boomerang's Application indicates it is not seeking to receive high-cost support, only low-

income Lifeline support. In its initial Application, the Company requests ETC designation in specific exchanges that are served by Blue Valley Tele-communications (Blue Valley), Sunflower/Bluestem Telephone Company (Sunflower/Bluestem), Craw-Kan Telephone Cooperative (Craw-Kan), Cunningham Telephone Co. (Cunningham), Golden Belt Telephone Association (Golden Belt), Haviland Telephone Company (Haviland), Home Telephone Company (Home), J.B.N. Telephone Company (J.B.N.), Kan-Okla Telephone Association (Kan-Okla), LaHarpe Telephone Company (LaHarpe), Madison Telephone (Madison), MoKan Dial (Mo-Kan), Moundridge Telephone Company (Moundridge), Peoples Telecommunications (Peoples), Rainbow Telecommunications Association (Rainbow), S&A Telephone Company (S&A), Southern Kansas Telephone (Southern Kansas), Totah Communications (Totah), Tri-County Telephone Association (Tri-County), Twin Valley Telephone (Twin Valley), United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink), Wamego Telecommunication Company (Wamego), Wheat State Telephone (Wheat State), Wilson Telephone Company (Wilson), Zenda Telephone Company (Zenda), and specific AT&T Kansas exchanges.¹

On February 24, 2012, Boomerang availed itself to the FCC's blanket forbearance from the facilities requirement in Section 241(e)(1)(A) that the FCC approved August 8, 2012.

On February 24, 2012, Boomerang filed its initial Compliance Plan with the FCC. On April 12, 2012; May 22, 2012; June 13, 2012; and June 29, 2012, Boomerang filed revised Compliance Plans with the FCC that included: a) providing the additional requirements specified in DA 12-314; b) confirming Boomerang's intent to serve residents on Tribal Lands; c) providing information relating to the Company's wholesale offerings; d) providing further details on Boomerang's relationship with its underlying carrier; e) extending the scope of the original Application to add Tribal locations in certain states; and f) making minor adjustments throughout its Compliance Plan, which was approved by the FCC on August 8, 2012, in FCC Public Notice DA 12-1286.

Boomerang is a reseller of CMRS, with Sprint, Verizon, and other GMS carriers as their underlying providers. Boomerang is headquartered in Hiawatha, Iowa, and the President and CEO is Dennis Henderson.

ANALYSIS:

Boomerang is a Foreign Limited Liability Company organized under the laws of the state of Iowa. Boomerang is authorized to conduct business as a Foreign Limited Liability Company in the state of Kansas. Boomerang is properly registered with the Kansas Secretary of State's Office and its status is "*active and in good standing*".

Federal ETC Requirements

Pursuant to 47 U.S.C. § 214(e)(1), a common carrier designated as an eligible telecommunications carrier shall be eligible to receive universal service support in accordance with Section 254 of the Federal Act and shall, throughout the service area for which the designation is received – (A) offer the services that are supported by federal universal service

¹ Reference Exhibit [A] for exchange details.

support mechanisms under Section 254(c) of the Federal Act, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such service and the charges therefore using media of general distribution.²

Congress empowers the states to designate a common carrier as an ETC. Federal law, 47 U.S.C. § 214 (e)(2), states that "Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and *shall*, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission." (emphasis added).

Service or Functionalities

The FCC identifies the services or functionalities that shall be supported by the federal universal service support mechanisms, pursuant to 47 U.S.C. § 254 (c). The supported services are codified in 47 C.F.R. § 54.101(a),

Voice Telephony services shall be supported by federal universal service support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

In its Application, Boomerang provided the following explanations of how it proposes to provide Voice Telephony services.

Voice-grade access to the public switched network – Boomerang provides voice grade access to the public switched telephone network (PSTN) through the purchase of wholesale CMRS service from Sprint, Verizon, and other GSM's.

Local usage – As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. The FCC has not specified a minimum amount of local usage that an ETC must offer.³ Boomerang offers two rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to emergency services – Boomerang provides 911 and E911 access for all of its customers to the extent the local government in its service area have implemented 911

² 47 U.S.C. § 254.

³ See e.g. *In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision 15 FCC Rcd 7331 (2002).

and E911 systems. Boomerang states they will also comply with the FCC's regulation governing the deployment and availability of E911 compatible handsets.

Toll limitations for qualifying low-income consumers – In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.⁴ Nonetheless, Boomerang's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. Boomerang's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same. Boomerang will not seek reimbursement for toll limitation service (TLS).

Boomerang will make available to Lifeline customers two Lifeline Plan offerings: 1) Lifeline 150 Minute Plan; and 2) Lifeline 250 Minute Plan, both at zero cost to the Lifeline customer. With these two Lifeline plans, the Lifeline customer receives a free handset, several custom calling features, free calls to customer service, and 911 emergency services. Boomerang's parent company, HH Ventures, has a separate company, Ready Mobile, that offers wireless service to non-Lifeline users, therefore Boomerang does not have any larger plans to offer their Lifeline users at a discount.

The Commission determined in its October 2, 2006, Order in Docket No. 06-GIMT-446-GIT [446 Docket] ("October 2nd Order") that it would follow the FCC's guidance and evaluate local usage by considering the comparability of a Competitive Eligible Telecommunications Carrier's (CETCs) offering on a case-by-case basis "by evaluating the total service package, including the local calling scope, included features and usage that might otherwise be considered long distance." The Commission further stated that it would consider whether an ETC Applicant offers unlimited calling to government, social service, health facilities, educational institutions and emergency numbers when considering comparability.¶¶7-8.

AT&T Kansas' monthly rate for a residential access line is \$21.00 in the requested AT&T Kansas exchanges before the federal Lifeline discount is applied. The local calling scope is the exchange, but local calls are unlimited.

CenturyLink's⁵ monthly rate for a residential access line is \$17.73 in the requested exchanges before the federal Lifeline discount is applied. The local calling scope is the exchange, but local calls are unlimited.

The monthly rate for a residential access line ranges from \$11.77 to \$15.24 in the Sunflower/Bluestem exchanges. The monthly rate for a residential access line in Craw-Kan is \$17.36. The monthly rate for a residential access line in Golden Belt is \$18.25. The monthly rate for a residential access line in Home is \$17.25. The monthly rate for a residential access line in MoKan is \$13.60. The monthly rate for a residential access line in Totah is \$17.15. The monthly rate for a residential access line in Blue Valley, Cunningham, Haviland, J.B.N., Kan-

⁴ See Lifeline Reform Order §54.401(a)(2). Toll limitation service does not need to be offered for any Lifeline service that does not distinguish between toll and non-toll calls in the pricing of the service.

⁵ Operating companies include United Telephone of Kansas, Embarq Missouri d/b/a United Southeast Kansas, United of Eastern-Kansas, and United of South Central Kansas.

Okla, LaHarpe, Madison, Moundridge, Peoples, Rainbow, S&A, Southern Kansas, Tri-County, Twin Valley, Wamego, Wheat State, Wilson and Zenda is \$16.75, prior to the Lifeline discount.⁶

Staff does not believe the local usage that will be offered in Boomerang's Lifeline Offerings is clearly comparable, but rather, Staff believes in this case local usage comparability would depend on the usage pattern of the particular customer. A customer that completes calls primarily within their exchange may not find the amount of local usage offered by Boomerang to be comparable to the offering of the incumbent. However, a customer that completes calls outside of their exchange may find that the local usage is comparable. When one considers the calling scope, usage that might otherwise be considered long distance and mobility, a consumer may find Boomerang's plans comparable to the incumbent's service offering.

Staff is satisfied that Boomerang has demonstrated an ability to provide "voice telephony service" in the requested service areas.

Lifeline Calling Plan Rule

In the Commission's October 2nd Order, the Commission determined that, among other things, ETCs must apply the Lifeline discount to the service plan a qualifying Lifeline customer chooses. The Commission specifically ordered the following:

ETCs are required to allow Lifeline customers to choose a calling plan and to apply the Lifeline discount to the plan selected by the customers. Any ETC that does not allow customer selection at this time must do so within 180 days of the date of this Order.⁷

Boomerang's offering of two Lifeline Credit Discount Plans satisfies the Commission's Order Adopting Requirement for Designation of Eligible Telecommunications Carriers; whereby, Lifeline subscribers may choose any standard Boomerang service plan and apply the available Lifeline credit.

Consumer Eligibility and Enrollment

In the Report and Order and Further Notice of Proposed Rulemaking,⁸ the FCC comprehensively reformed and began the modernization of the Universal Service Fund's Lifeline program. Part of that reform was the establishment of uniform eligibility criteria application information in all states.⁹ The Lifeline Credit Application is used to collect specific customer information on either of two qualifying programs (Income-Based or Program-Based) to make certain that the Lifeline subscriber is eligible to receive the Lifeline service. On July 26, 2012, Boomerang filed an amended Compliance Plan with the FCC, which included Boomerang's Lifeline Credit Application template as Exhibit [B].

⁶ The rural LEC rates will be effective March 1, 2013, ref. Docket No. 13-GIMT-130-GIT.

⁷ In the Matter of a General Investigation Addressing Requirements for Designation of Eligible Telecommunications Carriers, Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designations of Eligible Telecommunications Carrier, October 2, 2006, (446 Docket), ¶ 77e.

⁸ See FCC R&O and FNPM, FCC12-11, released February 6, 2012.

⁹ 47 C.F.R. §§54.410(a), (b)(1), (c)(1), 54.410(d)(1), (d)(2), (d)(3)

When Boomerang filed its Application to be designated an ETC in the state of Kansas, the Company included its Lifeline Credit Application. However, Staff's analysis found that the Lifeline Credit Application failed to meet the Kansas Lifeline program for the Program-Based criteria.

Boomerang's Lifeline Credit Application, as filed, was not in compliance with the Commission's 446 Docket. On November 9, 2012, Staff submitted RFI 3.1 addressing that the Program-Based criteria was missing three Kansas eligible programs listed on Boomerang's submitted Lifeline Credit Application. Staff noted all Income-Based criteria indicated 135% of the Federal Poverty Level (FPL) on the Lifeline Credit Application submitted by Boomerang. Kansas parameters are based on 150% of the FPL, which did not meet Kansas Lifeline requirements. Staff submitted RFI 3.2 requesting the Lifeline Credit Application be modified to reflect the 150% FPL guidelines for Kansas.

In response to Staff's RFI 3.1 and 3.2, Boomerang revised its Kansas Lifeline Credit Application and resubmitted the Form on February 1, 2013, which now conforms to the eligible Program-Based and Income-Based criteria, Staff is satisfied that Boomerang's Kansas Lifeline Credit Application now meets the Kansas Lifeline program parameters.

Financially and Technically Capable

1. Requirements

The FCC, in its Lifeline Reform Order, amended sections 54.201 and 54.202 of its rules, governs ETC designation by states to require a carrier seeking designation as a wireless Lifeline-Only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules. Therefore, in order to ensure wireless Lifeline-Only ETCs are financially and technically capable to provide Lifeline service, the FCC included an explicit requirement in both 54.201 and 54.202 for a common carrier seeking to be designated as a Lifeline-Only ETC demonstrate its financial and technical capability to provide the supported service.

The FCC stated that among the relevant considerations for such a showing are:

- a) Whether the Applicant previously offered services to non-Lifeline consumers;
- b) How long the Company has been in business;
- c) Whether the Applicant intends to rely exclusively on USF disbursements to operate;
- d) Whether the Applicant receives or will receive revenue from other sources; and
- e) Whether the Company has been subject to enforcement action or ETC revocation proceeding in any state.

The Commission requested comment in its March 27, 2012, Order in Docket No. 10-GIMT-658-GIT on what additional information should be provided by wireless Lifeline-Only ETCs to demonstrate their financial and technical capability. After reviewing the Comments filed, the Commission determined in its June 21, 2012, Order that:

The FCC requires Lifeline-only ETC applicants to provide, in their Compliance Plan, a detailed description of how the carrier offers service, the geographic areas

in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available. Lifeline-only ETC applicants should file Kansas-specific information regarding financial and technical capacity similar to the information provided in the carrier's FCC Compliance Plan when filing for Lifeline-only ETC status in Kansas.

2. Boomerang's Demonstration of Financial and Technical Capacity

In Boomerang's Application and Compliance Plan, the Company states the following regarding the five considerations of its financial and technical capabilities:

- a) Boomerang states they are financially and technically capable of providing Lifeline-supported services. Boomerang indicates its parent company, HH Ventures, has more than 350,000 wireless subscribers and over 50,000 retail customers. HH Ventures offers non-Lifeline service through its Ready Mobile wireless company. Boomerang states they have access to capital from the parent company's non-Lifeline customers and from their investors.
- b) Boomerang's parent, HH Ventures, is based in Hiawatha, Iowa, and has been in business since 2008 providing service to non-Lifeline customers.
- c) Boomerang has not and will not be relying exclusively on Lifeline reimbursements for the Company's operating revenues — and is therefore not exclusively dependent on universal service funds.
- d) Boomerang states they have not been subject to any enforcement actions by the FCC nor has it been subject to any ETC revocation proceedings in any state.

However, in performing our normal investigations, Staff found Boomerang's parent company, HH Ventures, and Ready Mobile have been delinquent numerous times in their KUSF reporting and payments. GVNW, the Administrator of the KUSF fund, furnished delinquency letters back to 2009 on almost a monthly basis indicating contact with the Company regarding payments that were overdue. The records indicate payments would be made eventually, but in arrears for the majority of the time. The Company is current as of now and has indicated they have hired a third party to administer their reporting and payments to the Commission in order to rectify this problem. Staff recommends the reporting and payments be monitored to assure HH Ventures, Ready Mobile and Boomerang continue to stay current in the Universal Service payments, but is of the opinion the Company has made a good faith effort to remedy the issue.

Boomerang further stated in its Application that the Company has contracted with CGM, LLC, a Lifeline service bureau, to edit all subsidy request data including: 1) a check for duplicate same-month Lifeline subsidies (double dip); and 2) inactive lines receiving subsidies, based on same name and/or same address.

Staff is satisfied that Boomerang meets the FCC's rules pursuant to section 54.202 as being financially and technically capable to offer Lifeline-Only support in its requested service areas as long as their KUSF reporting and payments remain current both for Boomerang and the parent company, HH Ventures d/b/a Ready Mobile.

Types of Facilities Used to Provide Service

Boomerang is a provider of CMRS and, since receiving the approval from the FCC, has been granted ETC designation in several states. Boomerang obtains from Sprint and Verizon the network infrastructure, including wireless transmission facilities, to allow the Company to operate as a Mobile Virtual Network Operator (MVNO). The Company is designated as an ETC in Maryland, Michigan, Texas, Iowa, Kentucky, Louisiana, Ohio, Oklahoma, South Carolina, Wisconsin and West Virginia. Pending Applications have been filed in Illinois and Colorado. The Company states that no petitions have been denied.

On August 9, 2012, the FCC approved Boomerang's Compliance Plan, which was filed as a condition of Boomerang's FCC blanket forbearance, where the FCC in the *Lifeline Reform Order* found that a grant of blanket forbearance of the facilities requirement, subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-Only service.¹⁰

There are four conditions that Boomerang is required to implement to prevent waste, fraud and abuse in the Lifeline program. They are as follows:

1. Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to the Universal Service Administrative Company (USAC) and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;
2. Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
3. Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
4. Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe¹¹ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

Staff is satisfied that Boomerang has applied for, and received approval of, its Compliance Plan with the FCC. The four aforementioned conditions in Boomerang's Compliance Plan demonstrate its efforts to eliminate waste, fraud, and abuse in the Lifeline program, an objective that both the FCC and state Commissions are striving to achieve.

¹⁰ See Lifeline Reform Order, FCC 12-11 at ¶¶ 368-381.

¹¹ See 47 C.F.R. § 54.405(e)(1).

Service Areas

Section 214(e)(5) of the Federal Act defines "service area" as:

The term "service area" means a geographic area established by a State commission for the purpose of determining universal service obligations and support mechanisms. In the case of an area served by a rural telephone company, "service area" means such company's "study area" unless and until the [Federal Communications] Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company.

"Service areas" or "operating areas" are defined by the state act in K.S.A. 66-1,187(k) the act provides that:

- (1) In the case of a rural telephone company, operating area or service area means such company's study area or areas as approved by the federal communications commission; and
- (2) in the case of a local exchange carrier, other than a rural telephone company, operating area or service area means such carrier's local exchange service area or areas as approved by the commission.

AT&T Kansas is considered a non-rural telephone company for federal support purposes. The wire center/exchange is the designated service area for federal support purposes for AT&T Kansas.

CenturyLink is considered a rural telephone company for federal support purposes. Blue Valley, Sunflower/Bluestem, Craw-Kan, Cunningham, Golden Belt, Haviland, Home, J.B.N., Kan-Okla, LaHarpe, Madison, Mo-Kan, Moundridge, Peoples, Rainbow, S&A, Southern Kansas, Totah, Tri-County, Twin Valley, Wamego, Wheat State, Wilson and Zenda are considered rural telephone companies for federal support purposes. Thus, the service area is the study area unless the Commission redefines the service area and the FCC concurs.

Boomerang requests ETC designation throughout the entire study areas of Blue Valley, Cunningham, Haviland, Home, Kan-Okla, LaHarpe, MoKan, Moundridge, Peoples, Rainbow, S & A, Southern Kansas, Wamego, Wheat State, Wilson and Zenda; therefore, there is no need to redefine those study areas. However, Boomerang's licensed service areas overlap several other rural carriers in Kansas, including exchanges served by Sunflower/Bluestem, Craw-Kan, Golden Belt, JBN, Madison, Totah, Tri-County, Twin Valley, and Embarq Missouri d/b/a CenturyLink Telephone that require redefinition. These exchanges will be discussed further below.

AT&T Kansas is a non-rural carrier for federal support purposes; therefore, Boomerang is required to provide service throughout each exchange. Reference Exhibit [A] for list of exchanges.

Staff believes Boomerang is licensed to provide service to the requested exchanges and will provide the supported services. Consequently, Staff believes Boomerang is eligible to be granted

ETC designation in the requested AT&T Kansas exchanges, if the Commission deems it is in the public interest.

Blue Valley, Cunningham, Haviland, Home, Kan-Okla, LaHarpe, MoKan, Moundridge, Peoples, Rainbow, S & A, Southern Kansas, Wamego, Wheat State, Wilson and Zenda

Boomerang requests ETC designation throughout the entire study areas served by the aforementioned companies. Staff believes Boomerang is licensed to provide service throughout the study areas served by these aforementioned companies, therefore, Staff believes Boomerang is eligible to be designated as an ETC in these companies' study areas, if the Commission determines it is in the public interest.

Redefinition of Rural Local Exchange Carrier Service Areas

Seventeen of the requested rural telephone company service areas have previously been redefined: Blue Valley, CenturyLink-Eastern, CenturyLink-United, Craw-Kan, Golden Belt, Haviland, Home, J.B.N., Kan-Okla, Madison, Southern Kansas, Totah, Tri-County, Twin Valley, Sunflower/Bluestem, Wheat State, and Wilson. The Commission previously redefined the Haviland, Sunflower/Bluestem, and CenturyLink-United service areas to the wire center level in Docket No. 04-RCCT-338-ETC, and the FCC concurred with this Commission's decision on May 23, 2005 (by taking no action on the matter). The Commission approved the redefinition of the CenturyLink United-Eastern service area to the exchange in Docket No. 04-HBCT-1107-ETC, and the FCC concurred with this Commission's decision on March 7, 2005 (by taking no action on the matter). The Commission approved the redefinition of the Home service area to the exchange in Docket No. 08-NTWZ-1076-ETC, and the FCC concurred with this Commission's decision on March 16, 2009 (by taking no action on the matter). The Commission approved the redefinition of the Golden Belt, Tri-County, Twin Valley, and Wheat State's service area to the exchange level in Docket No. 09-NECZ-747-ETC, and the FCC concurred with this Commission's decision on May 3, 2012 (by taking no action on the matter). The Commission previously redefined the Blue Valley, Craw-Kan, J.B.N., Kan-Okla, Madison, Southern Kansas, Totah, and Wilson's service area to the exchange in Docket No. 10-VMBZ-657-ETC, and the FCC concurred with this Commission's decision on May 4, 2012 (by taking no action on the matter). The Commission approved the redefinition of the Cunningham, LaHarpe, Mo-Kan, Moundridge, Peoples, Rainbow, S&A, Wamego, and Zenda areas in Docket No. 12-IRWZ-848-ETC. On December 21, 2012, i-Wireless, LLC (i-Wireless) filed a Petition with the FCC requesting redefinition to the wire center for the aforementioned service areas approved by the Kansas Corporation Commission (KCC).¹² Boomerang is requesting the entire service area in these rural telephone companies; therefore, awaiting redefinition from the FCC is not required.

Staff believes Boomerang is qualified to provide service to the requested exchanges and will provide the supported services. Consequently, Staff believes Boomerang is eligible to be granted ETC designation in the requested AT&T Kansas and rural telephone exchanges for Lifeline-Only, if the Commission deems it is in the public interest, and if Boomerang and their parent

¹² On January 4, 2013, the FCC requested comments on i-Wireless' Petition filed with the FCC on December 21, 2012, to redefine the service areas of Cunningham, LaHarpe, Mo-Kan, Moundridge, Peoples, Rainbow, S&A, Wamego and Zenda rural telephone companies, WC Docket 09-197. If i-Wireless' petition receives FCC approval, then redefinition of these service areas by Boomerang becomes unnecessary.

company, HH Ventures, continue to provide their reports and payments in a timely manner to the Commission regarding KUSF.

Advertising

Eligibility for federal universal service support is addressed by Section 214(e) of the Federal Act. Section 214(e)(1) of the Federal Act states as follows:

- (1) ELIGIBLE TELECOMMUNICATIONS CARRIERS – A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with Section 254 and shall, throughout the service area for which the designation is received – (A) offer the services that are supported by Federal universal service support mechanisms under Section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the charges therefore using media of general distribution.

Regarding its advertising, Boomerang states it regularly advertises the availability and rates for the services using media of general distribution as required by 47 C.F.R. §54.201(d)(2) of the FCC's regulations and the rules adopted by this Commission. The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as direct mail, community events, and the Internet, and promoting the availability of cost-effective wireless services to this neglected consumer segment. Boomerang may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service. Lastly, Boomerang states its intention to utilize its distribution network to help promote the availability of its Lifeline plans, especially those within its 428 retail locations in Kansas that are frequented by low-income consumers.

Staff notes that the Commission required CETCs to develop "meaningful language so that consumers will understand what they can expect from an ETC" and provide it to Staff to review within 90 days as directed by the Commission's October 2nd Order ¶12. In addition, the Commission determined that all CETCs shall include contact information for the Commission's Office of Public Affairs and Consumer Protection (PACP) in its advertisements to make sure that customers know where to turn with questions and complaints.

Boomerang's Application provided Staff with advertising language Boomerang intends to use for its Lifeline wireless customers. Moreover, Boomerang stated in its Application that the Company is aware that the Commission, in Docket No. 06-GIMT-446-GIT ¶12, requires all competitive ETCs to include contact information for the Commission's PACP in their advertisement so the customer knows where to turn with questions and complaints, and the Company will include the necessary language in its advertising. Below is that advertising language provided to Staff for review.

As a designated telecommunications carrier eligible to receive universal service support, Boomerang Wireless, LLC is proud to offer the Lifeline programs in the

state of Kansas. We will provide discounts off service activation (if applicable) and one basic monthly service for residential customers who qualify for certain medical, energy, or income-assisted programs. To determine if you qualify for Kansas Lifeline service, customers may call (800) 516-0414. For unresolved questions or complaints, you may contact the Kansas Corporation Commission, Office of Public Affairs and Consumer Protection, at KCC – Consumer Protection, 1500 SW Arrowhead Road, Topeka, KS 66604 or toll-free (800) 662-0027, in Topeka (785) 271-3140, or hearing or speech impaired TDD Kansas Relay Center (800) 766-3777.

Public Interest

The FCC, in its Virginia Cellular Order,¹³ made new findings regarding determination of the public interest. While the FCC's decision is not binding on this Commission, the Commission found in its ALLTEL and RCC Minnesota Orders that examination of the additional factors enumerated in the FCC's Order is reasonable.

In Boomerang's Application, the Company provided the following explanations of how it meets the guidelines that the FCC suggested for evaluation in the Virginia Cellular Order:

- **Benefits of Increased Competitive Choice** – Designation of Boomerang as an ETC will promote competition and innovation, and spur other carriers to target low-income consumers with service offerings tailored to their needs and to improve their existing networks to remain competitive, resulting in improved services to consumers. Designating Boomerang as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act. Introducing Boomerang into the market as an additional wireless ETC provider will afford low-income Kansas residents a wider choice of providers and available services while enhancing a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.
- **Competitive ETC's Ability to Provide the Support Services Throughout the Designated Service Area Within a Reasonable Time Frame** – Boomerang provides service in Kansas by reselling service which it obtains from its underlying facilities-based providers. The providers' networks are operational and largely built out. Thus, Boomerang will be able to commence offering its Lifeline service to all locations served by its underlying carrier very soon after receiving approval from the Commission. Boomerang commits to comply with the service requirements applicable to the support that it receives.
- **Impact of Multiple Designations on the Universal Service Fund** – The amount of support available to an eligible subscriber is exactly the same whether the support is

¹³ See *In the Matter of Federal State Joint Board on Universal Service: Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Released: January 22, 2004, (“Virginia Cellular Order”), FCC Docket No. DA 03-338.

given through a company such as Boomerang or the Incumbent LEC operating in the same service area. Boomerang will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETCs' Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order*, Boomerang will minimize the likelihood that its customers are not eligible or are receiving duplicative support either individually or within their household. In addition, designation of the Company as an ETC will not pose any adverse effect in the growth in the high cost portions of the USF, nor will it create or contribute to an erosion of high cost funding from any rural or non-rural telephone company.¹⁴

- **Unique Advantages and Disadvantages of the Competitor's Service Offering** – The public interest benefits of the Company's wireless service include local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 911 service and, where available, E911 service in accordance with current FCC requirements. Boomerang's Lifeline plans will not only allow mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a choice of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks or contracts. In sum, ETC designation in the State of Kansas would enable Boomerang to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, Boomerang would provide “increased consumer choice, high-quality service offerings, and mobility”, as well as the safety and security of effective 911 and E911 services.
- **Commitments Made Regarding High-quality Telecommunications Services By Company** – One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens regardless of geographic location or income. Designation of Boomerang as an ETC in Kansas will further the public interest by providing Kansas consumers, especially low-income consumers, with low price and high-quality services.

The Commission determined in its October 2nd Order that an ETC Applicant shall demonstrate that it has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes. In Boomerang's Application, the Company stated that it commits to remain functional pursuant to Section 54.202(a)(2) of the FCC rules. Boomerang further states that through its underlying carriers, it has the ability to remain functional in emergency situations. Through its

¹⁴ On February 20, 2013, Staff submitted RFI 6.1 to obtain Boomerang's specific impact to the federal USF from a Kansas perspective. In response to Staff's RFI 6.1, *Based on the company data, Boomerang calculations anticipate impacting the USF by 10% or 12,000-15,000 unserved eligible households for an approximate \$111,000-\$138,750 impact to the USF (penetration multiplied by \$9.25).*

agreement with Sprint and Verizon, Boomerang provides to its customers the same ability to remain functional in emergency situations as currently provided by Sprint and Verizon to their own customers, including access to a reasonable amount of the back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Also, in the October 2nd Order, the Commission requires all CETCs to file two-year Service Quality Improvement Plans demonstrating progress, including maps and, if targets were not met, an explanation of why on an annual basis beginning in August 2007. Because Boomerang is not seeking high-cost support for its wireless service, certain requirements¹⁵ concerning ETC Applications specific to high-cost support are inapplicable, and Boomerang's situation is such that submission of a service quality improvement is not applicable to the Company as a Lifeline-Only ETC Applicant. Staff concurs with this requirement given that the FCC revised its rules so that only high-cost ETCs are required to submit network improvement plans. The FCC amended section 54.202 to clarify that a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its Application for designation as an ETC.¹⁶

After reviewing Boomerang's Application and its responses to Staff RFIs, Staff believes that Boomerang has demonstrated that it is in the public interest to designate it as a wireless Lifeline-Only ETC for federal USF purposes in the requested service areas.

RECOMMENDATION:

Staff recommends approval of Boomerang's request for designation as an ETC for FUSF low-income purposes in the requested AT&T Kansas exchanges. (Reference Exhibit [A] for AT&T Kansas exchange detail.)

Staff recommends approval of Boomerang's request for ETC designation for FUSF low-income purposes in the study areas of Blue Valley, Cunningham, Haviland, Home, Kan-Okla, LaHarpe, MoKan, Moundridge, Peoples, Rainbow, S & A, Southern Kansas, Wamego, Wheat State, Wilson and Zenda.

Staff also recommends approval of Boomerang's request for ETC designation for FUSF low-income purposes in specific Sunflower/Bluestem, CenturyLink-United, Craw-Kan, Golden Belt, JBN, Madison, Totah, Tri-County, and Twin Valley exchanges. (Reference Exhibit [A] for complete list of rural exchanges.)

Staff notes that should the Commission approve the request for redefinition of the aforementioned rural service areas to the exchange level, Boomerang will not need to seek and receive concurrence from the FCC prior to receiving any FUSF low-income support for such areas as these areas have already received prior FCC approval.

Boomerang should be advised that support received must be used for its intended purpose each year and the Company and its parent, HH Ventures, must comply with other certification

¹⁵ See C.F.R. §54.202(a)(1)(ii)

¹⁶ See Lifeline and Link Up Reform Order at ¶ 386.

requirements developed by the Commission in Docket No. 05-GIMT-112-GIT and in any future proceedings. Additionally, Boomerang should be reminded that any future decisions made by the Commission resulting from the October 2nd Order, and any future decisions made by the Commission regarding additional ETC requirements, may impact the Company and the Company may be required to follow these to continue to receive support. The Company should be advised that reporting and payment of KUSF assessments and any other reporting requirements imposed by the Commission must be done in a timely manner in order to retain ETC designation.

cc: Patrice Petersen-Klein, Executive Director

NPA	NXX	State	Ratecenter	Short CLLI	LATA
785	889	KS	ONAGA	HOMEKSXA	534
785	353	KS	BEATTIE	HOMEKSXA	534
785	382	KS	VERMILLION	HOMEKSXA	534
785	744	KS	OKETO	HOMEKSXA	534
785	736	KS	AXTELL	HOMEKSXA	534
785	244	KS	SUMMERFLD	HOMEKSXA	534
785	348	KS	LINN	HOMEKSXA	534
785	799	KS	HOME	HOMEKSXA	534
785	619	KS	MARYSVILLE	HOMEKSXA	534
785	857	KS	CENTRALIA	HOMEKSXA	534
785	396	KS	WHEATON	HOMEKSXA	534
785	510	KS	WASHINGTON	HOMEKSXA	534
785	457	KS	WESTMORELD	HOMEKSXA	534
785	692	KS	PALMER	HOMEKSXA	534
620	274	KS	CEDARPOINT	AMRCKSXA	532
620	443	KS	AMERICUS	AMRCKSXA	532
620	279	KS	SAFFORDVL	AMRCKSXA	532
913	592	KS	SPRINGHILL	SPHLKSXA	524
913	686	KS	SPRINGHILL	SPHLKSXA	524
620	347	KS	ARMA	ARMAKSXA	532
620	638	KS	ARCADIA	ARMAKSXA	532
620	764	KS	MULBERRY	ARMAKSXA	532
620	597	KS	HALLOWELL	CLMBKSXB	532
620	674	KS	COLUBSRURL	CLMBKSXB	532
620	389	KS	CRESTLINE	CLMBKSXB	532
620	852	KS	COLONY	CLNYKSXA	532
620	763	KS	GALESBURG	GLBGKSXA	532
620	827	KS	W MINERAL	GRRDKSXA	532
620	362	KS	FARLINGTON	GRRDKSXA	532
620	354	KS	WALNUT	GRRDKSXA	532
620	395	KS	BRAZILTON	GRRDKSXA	532
620	632	KS	MCCUNE	GRRDKSXA	532
620	368	KS	HEPLER	GRRDKSXA	532
620	547	KS	HIATTVILLE	GRRDKSXA	532
620	457	KS	CHEROKEE	GRRDKSXA	532
620	724	KS	GIRARD	GRRDKSXA	532
620	396	KS	WEIR CITY	GRRDKSXA	532
913	471	KS	PRESCOTT	PLTNKSXA	524
913	352	KS	PLEASANTON	PLTNKSXA	524
620	939	KS	BRONSON	UNTWKSXA	532
620	754	KS	SAVONBURG	UNTWKSXA	532
620	756	KS	UNIONTOWN	UNTWKSXA	532
620	829	KS	DEVON	UNTWKSXA	532
620	857	KS	FULTON	UNTWKSXA	532
785	545	KS	GLEN ELDER	GLELKSXA	534
785	557	KS	DOWNS	GLELKSXA	534

785	593	KS	SIMPSON	GLELKSXA	534
785	739	KS	RANDALL	GLELKSXA	534
785	794	KS	FORMOSO	GLELKSXA	534
785	781	KS	CAWKERCITY	GLELKSXA	534
785	439	KS	JAMESTOWN	GLELKSXA	534
620	856	KS	BAXTER SPG	BXSPKSXA	532
620	783	KS	GALENA	GALNKSXA	532
620	848	KS	RIVERTON	RVTNKSXA	532
620	479	KS	SCAMMON	SCMNKSXA	532
785	514	KS	LA CROSSE	RSCTKSXA	534
785	726	KS	ELLIS	RSCTKSXA	534
785	731	KS	RANSOM	RSCTKSXA	534
620	569	KS	GARFIELD	RSCTKSXA	532
785	343	KS	ALEXANDER	RSCTKSXA	534
620	527	KS	ROZEL	RSCTKSXA	532
620	923	KS	ALBERT	RSCTKSXA	532
620	525	KS	BURDETT	RSCTKSXA	532
785	355	KS	TIMKEN	RSCTKSXA	534
785	387	KS	OTIS	RSCTKSXA	534
785	848	KS	BEELER	RSCTKSXA	534
785	798	KS	NESS CITY	RSCTKSXA	534
785	398	KS	BAZINE	RSCTKSXA	534
785	394	KS	MCCRACKEN	RSCTKSXA	534
785	391	KS	UTICA	RSCTKSXA	534
785	356	KS	BISON	RSCTKSXA	534
785	481	KS	BROWNELL	RSCTKSXA	534
785	372	KS	RUSHCENTER	RSCTKSXA	534
620	324	KS	LEWIS	RSCTKSXA	532
620	456	KS	CONWAY SPG	CNSPKSXA	532
620	478	KS	NORWICH	CNSPKSXA	532
620	867	KS	RIVERDALE	CNSPKSXA	532
620	435	KS	ARGONIA	CNSPKSXA	532
620	548	KS	MULLINVL	HVLDKSXA	532
620	594	KS	SAWYER	HVLDKSXA	532
620	739	KS	ISABEL	HVLDKSXA	532
620	246	KS	NASHVILLE	HVLDKSXA	532
620	862	KS	HAVILAND	HVLDKSXA	532
620	349	KS	GREENSBURG	HVLDKSXA	532
620	893	KS	COATS	HVLDKSXA	532
620	738	KS	WILMORE	HVLDKSXA	532
620	895	KS	CULLISON	HVLDKSXA	532
785	333	KS	GYPSPUM	ASSRKSXA	534
785	450	KS	LINDSBORG	ASSRKSXA	534
785	667	KS	ASSARIA	ASSRKSXA	534
785	254	KS	ROXBURY	ASSRKSXA	534
785	668	KS	SALEMSBURG	ASSRKSXA	534
620	654	KS	GALVA	GALVKSXA	532

620	824	KS	GENESEO	GALVKSXA	532
620	350	KS	CANTON	GALVKSXA	532
785	763	KS	BARNES	CUBAKSXA	534
785	778	KS	HADDAM	CUBAKSXA	534
785	729	KS	CUBA	CUBAKSXA	534
785	732	KS	AGENDA	CUBAKSXA	534
785	245	KS	MAHASKA	CUBAKSXA	534
785	358	KS	NARKA	CUBAKSXA	534
785	987	KS	MUNDEN	CUBAKSXA	534
785	265	KS	MORROWVL	CUBAKSXA	534
620	496	KS	LA HARPE	LHRPKSXA	532
620	437	KS	MADISON	MDSNKSXA	532
620	427	KS	MADISON	MDSNKSXA	532
913	783	KS	HILLSDALE	HLDLKSXA	524
913	837	KS	LOUISBURG	LSBGKSXA	524
785	878	KS	RANTOUL	RNTLKSXA	534
620	367	KS	GOESSEL	GSSLKSXA	532
620	345	KS	MOUNDRIDGE	MNRGKSXA	532
620	386	KS	MOUNDRIDGE	MNRGKSXA	532
913	757	KS	LA CYGNE	LACYKSXA	524
785	487	KS	HORTON	EVRSKSXA	534
785	300	KS	SABETHA	EVRSKSXA	534
913	366	KS	ELWOOD	EVRSKSXA	524
785	740	KS	HIAWATHA	EVRSKSXA	534
785	544	KS	ROBINSON	EVRSKSXA	534
785	547	KS	WILLIS	EVRSKSXA	534
785	988	KS	BENDENA	EVRSKSXA	534
785	334	KS	SENECA	EVRSKSXA	534
785	444	KS	HIGHLAND	EVRSKSXA	534
785	873	KS	WHITING	EVRSKSXA	534
785	990	KS	WATHENA	EVRSKSXA	534
785	982	KS	TROY	EVRSKSXA	534
785	847	KS	HURON	EVRSKSXA	534
785	872	KS	MUSCOTAH	EVRSKSXA	534
785	359	KS	DENTON	EVRSKSXA	534
785	548	KS	EVEREST	EVRSKSXA	534
620	528	KS	ALLEN	ALLNKSXA	532
785	793	KS	SCRANTON	SCTNKSXA	534
620	642	KS	LONGTON	BRDNKSXA	532
620	853	KS	REECE	BRDNKSXA	532
620	864	KS	PIEDMONT	BRDNKSXA	532
620	876	KS	DEXTER	BRDNKSXA	532
620	438	KS	BURDEN	BRDNKSXA	532
620	394	KS	ATLANTA	BRDNKSXA	532
620	843	KS	BEAUMONT	BRDNKSXA	532
620	329	KS	ELK FALLS	BRDNKSXA	532
620	358	KS	GRENOLA	BRDNKSXA	532

620	535	KS	BURDEN	BRDNKSXA	532
620	476	KS	ROSALIA	BRDNKSXA	532
620	965	KS	LATHAM	BRDNKSXA	532
620	467	KS	CAMBRIDGE	BRDNKSXA	532
620	545	KS	CLEARWATER	CLWRKSXA	532
620	584	KS	CLEARWATER	CLWRKSXA	532
785	200	KS	ABILENE	ABLNKSCD	534
785	669	KS	ALMENA	ALMEKSMA	534
620	446	KS	ARKANSASCY	ARCYKSSO	532
620	442	KS	ARKANSASCY	ARCYKSSO	532
620	441	KS	ARKANSASCY	ARCYKSSO	532
620	741	KS	ARKANSASCY	ARCYKSSO	532
785	322	KS	HERNDON	ATWDKSST	534
785	626	KS	ATWOOD	ATWDKSST	534
620	826	KS	BUCKLIN	BCKLKSSM	532
785	738	KS	BELOIT	BELTS02	534
785	569	KS	BELOIT	BELTS02	534
785	527	KS	BELLEVILLE	BLVLKSMS	534
785	734	KS	BIRD CITY	BRCYKSRE	534
620	726	KS	BURNS	BRNSKSPA	532
620	758	KS	CEDAR VALE	CDVAKSPL	532
620	582	KS	COLDWATER	CDWRKSLU	532
620	948	KS	COFFEYVL	CFVLKSDE	532
620	938	KS	CHASE	CHASKSWE	532
620	902	KS	CHANUTE	CHNTKSSS	532
620	431	KS	CHANUTE	CHNTKSSS	532
620	432	KS	CHANUTE	CHNTKSSS	532
620	433	KS	CHANUTE	CHNTKSSS	532
316	540	KS	CHENEY	CHNYKSKI	532
316	542	KS	CHENEY	CHNYKSKI	532
620	236	KS	CHETOPA	CHTPKSBE	532
620	336	KS	CHERRYVALE	CHVAKSEM	532
620	702	KS	CHERRYVALE	CHVAKSEM	532
785	632	KS	CLAYCENTER	CLCTKS06	534
785	275	KS	CONCORDIA	CNCRKSBR	534
785	243	KS	CONCORDIA	CNCRKSBR	534
785	262	KS	CONCORDIA	CNCRKSBR	534
620	628	KS	CANTON	CNTNKSSM	532
785	922	KS	CHAPMAN	CPMNKSO4	534
620	273	KS	COTONWDFLS	CTFLKSBR	532
913	583	KS	DE SOTO	DESTKSLU	524
913	585	KS	DE SOTO	DESTKSLU	524
316	746	KS	DOUGLASS	DGLSKSPI	532
316	747	KS	DOUGLASS	DGLSKSPI	532
316	321	KS	EL DORADO	ELDOKSST	532
316	323	KS	EL DORADO	ELDOKSST	532
316	322	KS	EL DORADO	ELDOKSST	532

316	320	KS	EL DORADO	ELDOKSST	532
785	472	KS	ELLSWORTH	ELWOKSNO	534
620	699	KS	READING	EMPRKS08	532
620	412	KS	EMPORIA	EMPRKS08	532
620	803	KS	EMPORIA	EMPRKS08	532
620	340	KS	EMPORIA	EMPRKS08	532
620	341	KS	EMPORIA	EMPRKS08	532
620	342	KS	EMPORIA	EMPRKS08	532
620	343	KS	EMPORIA	EMPRKS08	532
785	263	KS	ABILENE	ENTRK SCT	534
620	244	KS	ERIE	ERIEKSCI	532
620	912	KS	ERIE	ERIEKSCI	532
785	542	KS	EUDORA	EUDRKSKI	534
620	583	KS	EUREKA	EURKKSEL	532
620	878	KS	FLORENCE	FLRNKSTR	532
785	292	KS	FRANKFORT	FRFTKSLO	534
620	646	KS	FOWLER	FWLRKSMI	532
785	899	KS	GOODLAND	GDLDKSAB	534
620	723	KS	GREENSBURG	GNBGKSFL	532
620	805	KS	GARDENCITY	GRCYKS07	532
620	272	KS	GARDENCITY	GRCYKS07	532
620	276	KS	GARDENCITY	GRCYKS07	532
620	765	KS	GARDENCITY	GRCYKS07	532
620	275	KS	GARDENCITY	GRCYKS07	532
620	271	KS	GARDENCITY	GRCYKS07	532
620	260	KS	GARDENCITY	GRCYKS07	532
316	531	KS	GARDEN PL	GRDPKSLE	532
316	535	KS	GARDEN PL	GRDPKSLE	532
785	536	KS	GYPSUM	GYPSKSOW	534
620	277	KS	GARDENCITY	HLCMK SMA	532
316	830	KS	HALSTEAD	HLSTKSTE	532
316	835	KS	HALSTEAD	HLSTKSTE	532
785	258	KS	HERINGTON	HNTNKSNA	534
785	337	KS	HANOV RHNBG	HNVRSKED	534
785	675	KS	HOXIE	HOXIKSTR	534
620	392	KS	HARTFORD	HRFRKSAA	532
620	896	KS	HARPER	HRPRKSMA	532
620	921	KS	HUTCHINSON	HTSNKS02	532
620	474	KS	HUTCHINSON	HTSNKS02	532
620	259	KS	HUTCHINSON	HTSNKS02	532
620	669	KS	HUTCHINSON	HTSNKS02	532
620	665	KS	HUTCHINSON	HTSNKS02	532
620	560	KS	HUTCHINSON	HTSNKS02	532
620	664	KS	HUTCHINSON	HTSNKS02	532
620	966	KS	HUTCHINSON	HTSNKS02	532
620	802	KS	HUTCHINSON	HTSNKS02	532
620	663	KS	HUTCHINSON	HTSNKS02	532

620	662	KS	HUTCHINSON	HTSNKS02	532
620	727	KS	HUTCHINSON	HTSNKS02	532
620	728	KS	HUTCHINSON	HTSNKS02	532
620	931	KS	HUTCHINSON	HTSNKS02	532
620	694	KS	HUTCHINSON	HTSNKS02	532
620	374	KS	HOWARD	HWRDKSWA	532
620	330	KS	INDEPNNDCE	INDPKSMA	532
620	331	KS	INDEPNNDCE	INDPKSMA	532
620	332	KS	INDEPNNDCE	INDPKSMA	532
620	365	KS	IOLA	IOLAKSSY	532
620	380	KS	IOLA	IOLAKSSY	532
620	901	KS	IOLA	IOLAKSSY	532
785	428	KS	JEWELL	JEWLKSHA	534
620	532	KS	KINGMAN	KGMNKSMA	532
620	659	KS	KINSLEY	KNSLKSNI	532
913	724	KS	BASEHOR	KSCYKSBN	524
913	728	KS	BASEHOR	KSCYKSBN	524
913	721	KS	BONNER SPG	KSCYKSBN	524
913	667	KS	BONNER SPG	KSCYKSBS	524
913	441	KS	BONNER SPG	KSCYKSBS	524
913	422	KS	BONNER SPG	KSCYKSBS	524
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913	338	KS	KANSASCITY	KSCYKSCB	524
913	433	KS	KANSASCITY	KSCYKSCB	524
913	339	KS	KANSASCITY	KSCYKSCB	524
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913	323	KS	KANSASCITY	KSCYKSCB	524
913	458	KS	KANSASCITY	KSCYKSCB	524
913	315	KS	KANSASCITY	KSCYKSCB	524
913	469	KS	KANSASCITY	KSCYKSCB	524

913	789	KS	KANSASCITY	KSCYKSJO	524
913	362	KS	KANSASCITY	KSCYKSJO	524
913	912	KS	KANSASCITY	KSCYKSJO	524
913	574	KS	KANSASCITY	KSCYKSJO	524
913	624	KS	KANSASCITY	KSCYKSJO	524
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913	565	KS	LEAVENWTH	KSCYKSJO	524
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913	297	KS	LEAVENWTH	KSCYKSJO	524
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913	832	KS	KANSASCITY	KSCYKSJO	524
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913	738	KS	OLATHE	KSCYKSJO	524
913	730	KS	KANSASCITY	KSCYKSJO	524
913	514	KS	KANSASCITY	KSCYKSJO	524
913	725	KS	KANSASCITY	KSCYKSJO	524
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913	384	KS	KANSASCITY	KSCYKSJO	524
913	432	KS	KANSASCITY	KSCYKSJO	524
913	954	KS	KANSASCITY	KSCYKSJO	524
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913	424	KS	KANSASCITY	KSCYKSLE	524
913	752	KS	KANSASCITY	KSCYKSLE	524
913	555	KS	KANSASCITY	KSCYKSLE	524
913	859	KS	KANSASCITY	KSCYKSLE	524
913	541	KS	KANSASCITY	KSCYKSLE	524
913	928	KS	KANSASCITY	KSCYKSLE	524
913	577	KS	KANSASCITY	KSCYKSLE	524
913	410	KS	KANSASCITY	KSCYKSLE	524
913	827	KS	KANSASCITY	KSCYKSLE	524
913	826	KS	KANSASCITY	KSCYKSLE	524

913	694	KS	KANSASCITY	KSCYKSLE	524
913	894	KS	KANSASCITY	KSCYKSLE	524
913	895	KS	KANSASCITY	KSCYKSLE	524
913	307	KS	KANSASCITY	KSCYKSLE	524
913	495	KS	KANSASCITY	KSCYKSLE	524
913	588	KS	KANSASCITY	KSCYKSLE	524
913	438	KS	KANSASCITY	KSCYKSLE	524
913	993	KS	KANSASCITY	KSCYKSLE	524
913	477	KS	KANSASCITY	KSCYKSLE	524
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913	888	KS	KANSASCITY	KSCYKSLE	524
913	310	KS	KANSASCITY	KSCYKSLE	524
913	492	KS	KANSASCITY	KSCYKSLE	524
913	381	KS	KANSASCITY	KSCYKSNA	524
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913	712	KS	OLATHE	KSCYKSOL	524
913	768	KS	OLATHE	KSCYKSOL	524
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913	782	KS	OLATHE	KSCYKSOL	524
913	393	KS	OLATHE	KSCYKSOL	524
913	254	KS	OLATHE	KSCYKSOL	524
913	397	KS	OLATHE	KSCYKSOL	524
913	287	KS	KANSASCITY	KSCYKSPA	524
913	334	KS	KANSASCITY	KSCYKSPA	524
913	788	KS	KANSASCITY	KSCYKSPA	524
913	328	KS	KANSASCITY	KSCYKSPA	524
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913	596	KS	KANSASCITY	KSCYKSPA	524
913	409	KS	KANSASCITY	KSCYKSPA	524
913	375	KS	KANSASCITY	KSCYKSSH	524

913	268	KS	KANSASCITY	KSCYKSSH	524
913	631	KS	KANSASCITY	KSCYKSSH	524
913	962	KS	KANSASCITY	KSCYKSSH	524
913	248	KS	KANSASCITY	KSCYKSSH	524
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913	851	KS	KANSASCITY	KSCYKSST	524
913	239	KS	KANSASCITY	KSCYKSST	524
913	685	KS	KANSASCITY	KSCYKSST	524
913	897	KS	KANSASCITY	KSCYKSST	524
913	814	KS	KANSASCITY	KSCYKSST	524
913	632	KS	KANSASCITY	KSCYKSST	524
785	222	KS	LA CROSSE	LACRKSEL	534
620	309	KS	LIBERAL	LBRLKS04	532
620	482	KS	LIBERAL	LBRLKS04	532
620	417	KS	LIBERAL	LBRLKS04	532
620	624	KS	LIBERAL	LBRLKS04	532
620	626	KS	LIBERAL	LBRLKS04	532
620	629	KS	LIBERAL	LBRLKS04	532
316	742	KS	LEON	LEONKSPI	532
316	745	KS	LEON	LEONKSPI	532
785	227	KS	LINDSBORG	LNBGKSLI	534
785	524	KS	LINCOLN	LNCLKSLI	534
620	285	KS	LARNED	LRNDKSB	532
913	351	KS	LEAVENWTH	LVWOKSLN	524
913	727	KS	LEAVENWTH	LVWOKSLN	524
913	250	KS	LEAVENWTH	LVWOKSLN	524
913	680	KS	LEAVENWTH	LVWOKSSH	524
913	684	KS	LEAVENWTH	LVWOKSSH	524
913	682	KS	LEAVENWTH	LVWOKSSH	524
913	758	KS	LEAVENWTH	LVWOKSSH	524
913	946	KS	LEAVENWTH	LVWOKSSH	524
913	651	KS	LEAVENWTH	LVWOKSSH	524
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913	578	KS	LEAVENWTH	LVWOKSSH	524
913	306	KS	LEAVENWTH	LVWOKSSH	524
785	842	KS	LAWRENCE	LWRNKSV	534
785	330	KS	LAWRENCE	LWRNKSV	534
785	331	KS	LAWRENCE	LWRNKSV	534
785	505	KS	LAWRENCE	LWRNKSV	534
785	812	KS	LAWRENCE	LWRNKSV	534
785	843	KS	LAWRENCE	LWRNKSV	534
785	841	KS	LAWRENCE	LWRNKSV	534
785	691	KS	LAWRENCE	LWRNKSV	534
785	840	KS	LAWRENCE	LWRNKSV	534
785	865	KS	LAWRENCE	LWRNKSV	534
785	832	KS	LAWRENCE	LWRNKSV	534

785	312	KS	LAWRENCE	LWRNKSVE	534
785	830	KS	LAWRENCE	LWRNKSVE	534
785	979	KS	LAWRENCE	LWRNKSVE	534
785	838	KS	LAWRENCE	LWRNKSVE	534
785	813	KS	LAWRENCE	LWRNKSVE	534
785	864	KS	LAWRENCE	LWRNKSVE	534
785	748	KS	CLINTON	LWRNKSVE	534
785	749	KS	LAWRENCE	LWRNKSVE	534
620	257	KS	LYONS	LYNSKSEA	532
620	382	KS	MARION	MARNKSLA	532
785	538	KS	MCDONALD	MCDDKSKE	534
620	241	KS	MCPHERSON	MCSNKSAS	532
620	245	KS	MCPHERSON	MCSNKSAS	532
620	242	KS	MCPHERSON	MCSNKSAS	532
620	504	KS	MCPHERSON	MCSNKSAS	532
620	873	KS	MEADE	MEADKSSL	532
785	770	KS	MANHATTAN	MNHTKSFA	534
785	587	KS	MANHATTAN	MNHTKSFA	534
785	320	KS	MANHATTAN	MNHTKSFA	534
785	537	KS	MANHATTAN	MNHTKSFA	534
785	539	KS	MANHATTAN	MNHTKSFA	534
785	395	KS	MANHATTAN	MNHTKSFA	534
785	323	KS	MANHATTAN	MNHTKSFA	534
785	776	KS	MANHATTAN	MNHTKSFA	534
785	340	KS	MANHATTAN	MNHTKSFA	534
785	564	KS	MANHATTAN	MNHTKSFA	534
785	565	KS	MANHATTAN	MNHTKSFA	534
785	706	KS	MANHATTAN	MNHTKSFA	534
785	317	KS	MANHATTAN	MNHTKSFA	534
785	532	KS	MANHATTAN	MNHTKSFA	534
785	378	KS	MANKATO	MNKTKSCO	534
620	885	KS	MINNEOLA	MNNLKSTU	532
620	647	KS	MOLINE	MOLNKSMI	532
785	392	KS	MINNEAPOLS	MPLSKS02	534
785	546	KS	MARQUETTE	MRQTKSKI	534
316	661	KS	MOUNT HOPE	MTHPKS04	532
316	667	KS	MOUNT HOPE	MTHPKS04	532
785	629	KS	MARYSVILLE	MYVIKSEL	534
785	562	KS	MARYSVILLE	MYVIKSEL	534
620	422	KS	NICKERSON	NCSNKSHA	532
620	325	KS	NEODESHA	NDSHKS04	532
620	716	KS	NEODESHA	NDSHKS04	532
785	871	KS	NORTON	NRTNKSLI	534
785	877	KS	NORTON	NRTNKSLI	534
785	693	KS	NORCATUR	NRTNKSLI	534
785	475	KS	OBERLIN	OBRLKSHA	534
785	672	KS	OAKLEY	OKLYKS03	534

785	229	KS	OTTAWA	OTWAKSMA	534
785	418	KS	OTTAWA	OTWAKSMA	534
785	242	KS	OTTAWA	OTWAKSMA	534
913	294	KS	PAOLA	PAOLKSPE	524
913	259	KS	PAOLA	PAOLKSPE	524
913	557	KS	PAOLA	PAOLKSPE	524
785	543	KS	PHILLIPSBG	PHBGKS04	534
620	563	KS	PLAINS	PLNSKSLO	532
785	434	KS	PLAINVILLE	PLVLKSMI	534
620	622	KS	PROTECTION	PRTCKSMA	532
620	235	KS	PITTSBURG	PSBGKSLO	532
620	232	KS	PITTSBURG	PSBGKSLO	532
620	240	KS	PITTSBURG	PSBGKSLO	532
620	231	KS	PITTSBURG	PSBGKSLO	532
620	230	KS	PITTSBURG	PSBGKSLO	532
620	675	KS	SUBLETTE	SBLTKSOR	532
620	510	KS	SUBLETTE	SBLTKSOR	532
785	284	KS	SABETHA	SBTHKSVI	534
620	874	KS	SCOTT CITY	SCCYKSMA	532
620	872	KS	SCOTT CITY	SCCYKSMA	532
785	425	KS	STOCKTON	SKTNKSAS	534
785	655	KS	SOLOMON	SLMNKSOL	534
785	282	KS	SMITH CTR	SMCTKSMA	534
620	234	KS	STAFFORD	STFRKSBO	532
620	736	KS	SEVERY	SVRYKSRE	532
913	845	KS	TONGANOXIE	TNGNKS06	524
913	369	KS	TONGANOXIE	TNGNKS06	524
785	836	KS	TOPEKA	TPKAKSCA	534
785	271	KS	TOPEKA	TPKAKSFA	534
785	228	KS	TOPEKA	TPKAKSFA	534
785	256	KS	TOPEKA	TPKAKSFA	534
785	273	KS	TOPEKA	TPKAKSFA	534
785	555	KS	TOPEKA	TPKAKSFA	534
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785	478	KS	TOPEKA	TPKAKSFA	534
785	438	KS	TOPEKA	TPKAKSFA	534
785	559	KS	TOPEKA	TPKAKSJA	534
785	560	KS	MANHATTAN	TPKAKSJA	534
785	670	KS	TOPEKA	TPKAKSJA	534
785	580	KS	TOPEKA	TPKAKSJA	534
785	615	KS	EUDORA	TPKAKSJA	534
785	506	KS	TOPEKA	TPKAKSJA	534
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785	430	KS	TOPEKA	TPKAKSJA	534
785	492	KS	JUNCTIONCY	TPKAKSJA	534
785	350	KS	TOPEKA	TPKAKSJA	534
785	676	KS	TOPEKA	TPKAKSJA	534

785	640	KS	TOPEKA	TPKAKSJA	534
785	435	KS	TOPEKA	TPKAKSJA	534
785	431	KS	TOPEKA	TPKAKSJA	534
785	633	KS	TOPEKA	TPKAKSJA	534
785	234	KS	TOPEKA	TPKAKSJA	534
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785	291	KS	TOPEKA	TPKAKSJA	534
785	730	KS	TOPEKA	TPKAKSJA	534
785	741	KS	HIAWATHA	TPKAKSJA	534
785	270	KS	TOPEKA	TPKAKSJA	534
785	850	KS	TROY	TPKAKSJA	534
785	724	KS	TOPEKA	TPKAKSJA	534
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785	575	KS	TOPEKA	TPKAKSJA	534
785	368	KS	TOPEKA	TPKAKSJA	534
785	318	KS	LECOMPTON	TPKAKSJA	534
785	393	KS	LAWRENCE	TPKAKSJA	534
785	851	KS	HOLTON	TPKAKSJA	534
785	887	KS	LECOMPTON	TPKAKSLE	534
785	246	KS	TOPEKA	TPKAKSNO	534
785	286	KS	TOPEKA	TPKAKSNO	534
316	536	KS	TOWANDA	TWNDKSJE	532
316	541	KS	TOWANDA	TWNDKSJE	532
785	325	KS	WASHINGTON	WASHKS03	534
316	670	KS	WICHITA	WCHTKS47	532
316	554	KS	WICHITA	WCHTKS47	532
316	529	KS	WICHITA	WCHTKS47	532
316	524	KS	WICHITA	WCHTKS47	532
316	523	KS	WICHITA	WCHTKS47	532
316	522	KS	WICHITA	WCHTKS47	532
316	517	KS	WICHITA	WCHTKS47	532

316	526	KS	WICHITA	WCHTKS47	532
316	775	KS	WICHITA	WCHTKSAG	532
316	636	KS	WICHITA	WCHTKSAH	532
316	609	KS	WICHITA	WCHTKSAH	532
316	630	KS	WICHITA	WCHTKSAH	532
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316	833	KS	WICHITA	WCHTKSAM	532
316	570	KS	WICHITA	WCHTKSAM	532
316	300	KS	WICHITA	WCHTKSAN	532
316	555	KS	WICHITA	WCHTKSAN	532
316	218	KS	WICHITA	WCHTKSAN	532
316	733	KS	WICHITA	WCHTKSAN	532
316	778	KS	BENTON	WCHTKSBE	532
316	796	KS	WICHITA	WCHTKSCB	532
316	721	KS	WICHITA	WCHTKSCE	532
316	729	KS	WICHITA	WCHTKSCE	532
316	722	KS	WICHITA	WCHTKSCE	532
316	773	KS	WICHITA	WCHTKSCE	532
316	215	KS	WHITEWATER	WCHTKSCZ	532

316	772	KS	WHITEWATER	WCHTKSCZ	532
316	789	KS	WICHITA	WCHTKSDE	532
316	788	KS	WICHITA	WCHTKSDE	532
316	794	KS	GODDARD	WCHTKSGM	532
316	744	KS	WICHITA	WCHTKSKE	532
316	777	KS	WICHITA	WCHTKSML	532
316	946	KS	WICHITA	WCHTKSNW	532
316	942	KS	WICHITA	WCHTKSNW	532
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316	683	KS	WICHITA	WCHTKSOL	532
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316	978	KS	WICHITA	WCHTKSOL	532
316	688	KS	WICHITA	WCHTKSOL	532
316	776	KS	WICHITA	WCHTKSRH	532
316	831	KS	WICHITA	WCHTKSTE	532
316	828	KS	WICHITA	WCHTKSTE	532
316	832	KS	WICHITA	WCHTKSTE	532
316	821	KS	WICHITA	WCHTKSTE	532
316	838	KS	WICHITA	WCHTKSTE	532
316	755	KS	WICHITA	WCHTKSVC	532
316	416	KS	WHITEWATER	WCHTKSWW	532
316	799	KS	WHITEWATER	WCHTKSWW	532
620	359	KS	WELLINGTON	WGTNKS NF	532
620	326	KS	WELLINGTON	WGTNKS NF	532
620	968	KS	WELLINGTON	WGTNKS NF	532
620	507	KS	WELLINGTON	WGTNKS NF	532
620	399	KS	WELLINGTON	WGTNKS NF	532
785	746	KS	WILLIAMSBG	WLBGKSMA	534
620	705	KS	WINFIELD	WNFDKSMI	532
620	229	KS	WINFIELD	WNFDKSMI	532
620	221	KS	WINFIELD	WNFDKSMI	532

620	222	KS	WINFIELD	WNFDKSMI	532
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913	958	KS		WTVLKSST	
620	620	KS		WTVLKSST	
913	913	KS		WTVLKSST	
913	950	KS		WTVLKSST	
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316	696	KS		WTVLKSST	
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913	211	KS		WTVLKSST	
620	261	KS		WTVLKSST	

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316	996	KS		WTVLKSST	
785	552	KS		WTVLKSST	
620	913	KS		WTVLKSST	
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316	911	KS		WTVLKSST	
785	287	KS		WTVLKSST	
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913	911	KS		WTVLKSST	
620	580	KS		WTVLKSST	
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785	660	KS		WTVLKSST	
785	911	KS		WTVLKSST	
620	555	KS		WTVLKSST	
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913	711	KS		WTVLKSST	
316	498	KS		WTVLKSST	
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316	913	KS		WTVLKSST	
785	363	KS	BLRP-WTVL	WTVLKSST	534
620	711	KS		WTVLKSST	

620	625	KS	YATES CTR	YTCKSST	532
620	473	KS	HUMBOLDT	HMBLKSBR	532
316	444	KS	ANDALE	ANDLKSHI	532
316	445	KS	ANDALE	ANDLKSHI	532
620	842	KS	ANTHONY	ANTHKSWS	532
913	367	KS	ATCHISON	ATSNKSSF	524
913	360	KS	ATCHISON	ATSNKSSF	524
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620	868	KS	GREAT BEND	GRTBKSST	532
620	786	KS	GREAT BEND	GRTBKSST	532
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620	982	KS	PAWNEEROCK	PWRKKSUY	532
785	342	KS	SALINA	SALNKSTA	534
785	635	KS	HAYS	SALNKSTA	534
785	279	KS	LA CROSSE	SALNKSTA	534
785	404	KS	SALINA	SALNKSTA	534
785	493	KS	SALINA	SALNKSTA	534
785	827	KS	SALINA	SALNKSTA	534
785	452	KS	SALINA	SALNKSTA	534
785	787	KS	SALINA	SALNKSTA	534
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785	822	KS	SALINA	SALNKSTA	534
785	203	KS	PLAINVILLE	SALNKSTA	534
785	309	KS	SALINA	SALNKSTA	534
785	814	KS	WAKEENEY	SALNKSTA	534
785	432	KS	HAYS	SALNKSTA	534
785	208	KS	PHILLIPSBG	SALNKSTA	534
785	407	KS	MINNEAPOLS	SALNKSTA	534
785	826	KS	SALINA	SALNKSTA	534
785	498	KS	HAYS	SALNKSTA	534
785	205	KS	STOCKTON	SALNKSTA	534
785	820	KS	SALINA	SALNKSTA	534
785	201	KS	SALINA	SALNKSTA	534
785	825	KS	SALINA	SALNKSTA	534
785	335	KS	SCANDIA	SCNDKSFE	534
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620	710	KS	SEDAN	SEDNKSCH	532
785	336	KS	SENECA	SENCKSDE	534
785	332	KS	ST FRANCIS	STFNKSWA	534
620	449	KS	ST PAUL	STPLKSHI	532
785	274	KS	TOPEKA	TPKAKS37	534
785	861	KS	TOPEKA	TPKAKS37	534
785	862	KS	TOPEKA	TPKAKS37	534
785	267	KS	TOPEKA	TPKAKS37	534
785	266	KS	TOPEKA	TPKAKS37	534

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620	820	KS	PARSONS	PRSSKSWA	532
620	423	KS	PARSONS	PRSSKSWA	532
620	421	KS	PARSONS	PRSSKSWA	532
620	719	KS	PITTSBURG	PRSSKSWA	532
620	434	KS	MAYFIELD	CLWLKSXA	532
620	693	KS	NOMANCHETR	CLWLKSXA	532
620	984	KS	WALDRON	CLWLKSXA	532
620	845	KS	CALDWELL	CLWLKSXA	532
620	447	KS	GEUDA SPG	CLWLKSXA	532
620	962	KS	FREEPORT	CLWLKSXA	532
620	863	KS	CORBIN	CLWLKSXA	532
620	296	KS	HARDTNER	CLWLKSXA	532
620	967	KS	BLUFF CITY	CLWLKSXA	532
620	892	KS	SOUTHHAVEN	CLWLKSXA	532
620	346	KS	ELGIN	ELGNKSXA	532
785	949	KS	CARLTON	HOPEKSXA	534
785	257	KS	WOODBINE	HOPEKSXA	534
785	482	KS	DWIGHT	HOPEKSXA	534
785	497	KS	WILSEY	HOPEKSXA	534
785	479	KS	NAVARRE	HOPEKSXA	534
785	598	KS	BUCKEYE	HOPEKSXA	534
785	349	KS	WHITE CITY	HOPEKSXA	534
785	983	KS	LOST SPG	HOPEKSXA	534
785	965	KS	RAMONA	HOPEKSXA	534
785	466	KS	DELAVAN	HOPEKSXA	534
785	366	KS	HOPE	HOPEKSXA	534
785	488	KS	BENNINGTON	BGTNKSXA	534
785	388	KS	LONGFORD	BGTNKSXA	534
785	446	KS	CLYDE	MLVAKSXA	534
785	747	KS	GREENLEAF	MLVAKSXA	534
785	427	KS	MILTONVALE	MLVAKSXA	534
785	926	KS	MORGANVL	MLVAKSXA	534
785	455	KS	CLIFTON	MLVAKSXA	534
785	464	KS	AURORA	MLVAKSXA	534
785	463	KS	MILFORD	MLVAKSXA	534
785	461	KS	WAKEFIELD	RILYKSXA	534
785	468	KS	OLSBURG	RILYKSXA	534
785	944	KS	GREEN	RILYKSXA	534
785	485	KS	RILEY	RILYKSXA	534
785	436	KS	BEVERLY	TSCTKSXA	534
785	283	KS	TESCOTT	TSCTKSXA	534
785	792	KS	BARNARD	TSCTKSXA	534
785	523	KS	DELPHOS	TSCTKSXA	534
785	568	KS	GLASCO	TSCTKSXA	534
785	582	KS	SILVERLAKE	SLLKKSXA	534
785	499	KS	ALTA VISTA	ALT VKSXA	534

620	538	KS	ARLINGTON	ARTNKSXA	532
913	533	KS	BUCYRUS	BCYRKSA	524
913	879	KS	BUCYRUS	BCYRKSA	524
620	537	KS	BUFFALO	BFLOKSXA	532
620	488	KS	BELLEPLAIN	BLLPKSXA	532
620	790	KS	BELLEPLAIN	BLLPKSXA	532
913	756	KS	BLUE MOUND	BLMNKSXA	524
620	298	KS	CUNNINGHAM	CNHMKSXA	532
785	255	KS	CENTROPOLS	CNTRKSXA	534
620	834	KS	CONWAY	CNWKSA	532
785	924	KS	CIRCLEVL	CRVLKSXA	534
785	771	KS	DELIA	DELIKSA	534
785	935	KS	DENISON	DESNKSXA	534
913	893	KS	EDGERTON	EGTNKSXA	524
913	882	KS	EDGERTON	EGTNKSXA	524
785	535	KS	EMMETT	EMMTKSXA	534
913	773	KS	EASTON	ESTNKSXA	524
913	849	KS	FONTANA	FNTAKSXA	524
913	938	KS	GARDNER	GRNRKSXA	524
913	884	KS	GARDNER	GRNRKSXA	524
913	856	KS	GARDNER	GRNRKSXA	524
913	732	KS	OLATHE	GRNRKSXA	524
913	605	KS	GARDNER	GRNRKSXA	524
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785	589	KS	HARVEYVL	HVVLSXA	534
620	585	KS	INMAN	INMNKSXA	532
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620	256	KS	LEBO	LEBOKSXA	532
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913	874	KS	LANCASTER	LNCSKSXA	524
913	301	KS	LINWOOD	LNWDKSXA	524
913	723	KS	LINWOOD	LNWDKSXA	524
913	796	KS	MCLOUTH	MCLTKSA	524
785	453	KS	MICHIGNVLY	MCVYKSXA	534
913	795	KS	MOUND CITY	MDCYKSXA	524
620	743	KS	MAPLETON	MPTNKSXA	532
620	297	KS	MURDOCK	MRDCKSXA	532
785	484	KS	MERIDEN	MRDNKSXA	534
913	886	KS	NORTONVL	NRVLKSXA	524
620	884	KS	NEOSHO FLS	NSFLKSXA	532
620	963	KS	NEOSHO FLS	NSFLKSXA	532
785	528	KS	OSAGE CITY	OSCYKSXA	534
785	665	KS	OVERBROOK	OVBKKSXA	534
620	455	KS	OXFORD	OXFRKSXA	532
785	876	KS	OZAWKIE	OZWKKSXA	534
620	468	KS	PIQUA	PIQUKSXA	532

620	459	KS	PRETTYPRRI	PRPRKSXA	532
785	597	KS	PERRY	PRRYKSXA	534
785	937	KS	PRINCETON	PRTNKSXA	534
620	656	KS	PRESTON	PSTNKSXA	532
785	835	KS	RICHMOND	RCMDKSXA	534
785	584	KS	ROSSVILLE	ROVLKSXA	534
785	437	KS	ST MARYS	STMYKSXA	534
620	839	KS	THAYER	THYRKSXA	532
620	837	KS	WALTON	WLTNKSXA	532
785	883	KS	WELLSVILLE	WLVLSXA	534
913	774	KS	WINCHESTER	WNCHKSA	524
620	489	KS	WINDOM	WNDMKSXA	532
785	765	KS	ALMA	ALMAKSXA	534
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620	466	KS	HAVEN	BHLRKSXA	532
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785	654	KS	BURLINGAME	BRLNKSXA	534
620	463	KS	BURRTON	BRRTKSXA	532
785	449	KS	ESKRIDGE	ESRGKSXA	534
785	364	KS	HOLTON	HLTNKSXA	534
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785	784	KS	JUNCTIONCY	JNCYKSXA	534
785	238	KS	JUNCTIONCY	JNCYKSXA	534
785	223	KS	JUNCTIONCY	JNCYKSXA	534
785	717	KS	JUNCTIONCY	JNCYKSXA	534
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785	762	KS	JUNCTIONCY	JNCYKSXA	534
785	240	KS	JUNCTIONCY	JNCYKSXA	534
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620	328	KS	MOUND VLY	MNVYKSXA	532
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620	237	KS	MORAN	MORNKSXA	532
785	863	KS	OSKALOOSA	OSKLSXA	534
620	795	KS	OSWEGO	OSWGKSXA	532
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913	256	KS	OSAWATOMIE	OSWTKSXA	524
785	566	KS	POMONA	POMNKSXA	534
785	759	KS	QUENEMO	QUNMKSXA	534
785	985	KS	TROY	TROYKSXA	534

785	945	KS	VALLEY FLS	VLFLKSXA	534
785	595	KS	WHITECLOUD	WHCLKSXA	534
785	989	KS	WATHENA	WTHNKSXA	534
785	733	KS	WAVERLY	WVRLKSXA	534
785	636	KS	PAXICO	PAXCKSXA	534
785	494	KS	ST GEORGE	STGRKSXA	534
785	456	KS	WAMEGO	WAMGKSXA	534
785	458	KS	WAMEGO	WAMGKSXA	534
620	735	KS	CASSODAY	CSSDKSXA	532
620	753	KS	MATFLDGREN	MTGRKSXA	532
620	986	KS	ROCK	ROCKKSXA	532
620	475	KS	OLPE	OLPEKSXA	532
620	752	KS	POTWIN	PTWNKSXA	532
620	782	KS	UDALL	UDLLKSXA	532
785	373	KS	TIPTON	WLSNKSXA	534
785	529	KS	HUNTER	WLSNKSXA	534
785	658	KS	WILSON	WLSNKSXA	534
785	525	KS	LUCAS	WLSNKSXA	534
785	526	KS	SYLVAN GRV	WLSNKSXA	534
785	277	KS	DENMARK	WLSNKSXA	534
785	225	KS	BROOKVILLE	WLSNKSXA	534
620	243	KS	ZENDA	ZENDKSXA	532

PLEASE FORWARD THE ATTACHED DOCUMENT (S) ISSUED IN THE ABOVE-REFERENCED DOCKET
TO THE FOLLOWING:

NAME AND ADDRESS	NO. CERT. COPIES	NO. PLAIN COPIES
JAMES T. BALVANZ BOOMERANG WIRELESS, LLC 955 KACENA RD STE A HIAWATHA, IA 52233		
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MARGARET A JOHNSON JONES WALKER WAECHTER POITEVENT CARRERE & DENEGR 190 E CAPITOL STREET, STE. 800 PO BOX 427 JACKSON, MS 39205-0427		
OTTO NEWTON, LITIGATION COUNSEL 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604 ***Hand Delivered***		

ORDER MAILED **MAR 14 2013**

The Docket Room hereby certified that on this _____ day of _____, 20_____, it caused a true and correct copy of the attached ORDER to be deposited in the United States Mail, postage prepaid, and addressed to the above persons.