

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

Before Commissioners:                   Dwight D. Keen, Chair  
  Susan K. Duffy  
  Andrew J. French

In the Matter of Certification of Compliance	)	
With Section 254(e) of the Federal	)	Docket No. 23-GIMT-644-GIT
Telecommunications Act of 1996 and	)	
Certification of Appropriate Use of Kansas	)	
Universal Service Fund Support	)	

**ORDER OPENING DOCKET; REQUIRING COMPLIANCE FILINGS**

NOW, the above captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the files and records and being duly advised in the premises, the Commission finds as follows:

1.     The Federal Communications Commission (FCC) requires Eligible Telecommunications Carriers (ETCs) receiving federal high-cost support to submit certain information to the states, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1st of each year.<sup>1</sup>

2.     Furthermore, the FCC requires states to certify to the FCC every calendar year (by October 1st) that ETCs receiving federal high-cost support in such state used the support in the preceding calendar year and will use the support in the coming calendar year "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."<sup>2</sup> If a state does not certify that an ETC used its federal high-cost support appropriately,

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<sup>1</sup> 47 C.F.R. §54.313.

<sup>2</sup> 47 C.F.R. §54.314(a).

the ETC will not receive the support.<sup>3</sup>

3. The Commission believes that this docket should be opened to collect the information required to be submitted pursuant to the FCC's rules, and to determine whether the Commission should certify that the ETCs in Kansas have used and will use their federal Universal Service Fund (USF) support appropriately for 2022 and 2024, respectively. The docket should also be used to determine whether Kansas ETCs used their Kansas Universal Service Fund (KUSF) support appropriately in 2022 and will use their support appropriately in 2024.<sup>4</sup>

4. Commission Staff (Staff) prepared a Report and Recommendation (R&R) dated March 8, 2023, attached hereto as Exhibit A, and made a part hereof by reference. The R&R addresses the above stated matters and requests the Commission open this docket. The Commission approves Staff's R&R and adopts the request.

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. This docket shall be opened for the purposes of receiving information and certifications to ensure compliance with 47 U.S.C. § 254(e) and to ensure appropriate use of federal USF and KUSF support.

B. The required ETC certifications, along with the attached worksheet(s), shall be filed with the Commission in this docket on or before July 1, 2023. Refer to Staff's R&R to determine which filings need to be made by which entities and how to report the information. Note that copies of the supporting Excel files for Attachments 2-4 should be e-mailed to [b.seamans@kcc.ks.gov](mailto:b.seamans@kcc.ks.gov) and [h.bhagat@kcc.ks.gov](mailto:h.bhagat@kcc.ks.gov), concurrent with the filing in the docket. The annual "ETC Certification Files" may be downloaded from the Commission's website at:

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<sup>3</sup> *Id.*

<sup>4</sup> See Order Adopting Staff Workshop Report and Issue Resolutions and Soliciting Additional Comments, Docket No. 08-GIMT-154-GIT (Jan. 30, 2009).

<https://kcc.ks.gov/telecommunications/service-provider-forms>. ETCs are reminded that late or incomplete filings may result in fines or penalties.

C. ETCs that received high-cost KUSF support in 2022 should use the Annual Total amount of support listed for the carrier on Staff Exhibit 1. If an ETC believes it should report a different number, it should contact Staff to discuss the matter. If an ETC reports a different number, it needs to explain why the different amount was used and why it differs from the amount on Staff Exhibit 1.

D. ETCs are to certify all federal high-cost support receipts, therefore, to ensure Staff's review and the Commission's decisions regarding certification meet the obligation to certify all federal high-cost support, an ETC should report all federal high-cost support (i.e., ACAM) and not allocate its federal high-cost support. Staff's review and recommendations regarding ETC certification take into consideration that federal high-cost support may be provided for both voice and broadband services.

E. ETCs are reminded that any information filed confidentially shall comply with K.A.R. 82-1-221a. This includes K.A.R. 82-1-221a(a)(5)'s requirement of a written explanation explaining whether the information constitutes a trade secret or confidential commercial information, and an explanation regarding the harm or potential harm disclosure would cause. Failure to comply with such regulation may result in a penalty or public disclosure of information.

F. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).<sup>5</sup>

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<sup>5</sup> K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

**BY THE COMMISSION IT IS SO ORDERED.**

Duffy, Chair; Keen, Commissioner; French, Commissioner

Dated: 03/21/2023



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Lynn M. Retz  
Executive Director

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# **EXHIBIT A**

## REPORT AND RECOMMENDATION UTILITIES DIVISION

**TO:** Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

**FROM:** Sandy Reams, Assistant Chief of Telecommunications  
Bryan Seamans, Chief of Telecommunications & SPP Affairs  
Jeff McClanahan, Director of Utilities

**DATE:** March 8, 2023

**SUBJECT:** Docket No. 23-GIMT-644-GIT

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support.

### **EXECUTIVE SUMMARY:**

The Federal Communications Commission (FCC) requires Eligible Telecommunications Carriers (ETCs) to submit specific information, set forth in 47 C.F.R. § 54.313, to the States, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1<sup>st</sup> of each year.<sup>1</sup> In addition, pursuant to 47 C.F.R. § 54.314 and 47 U.S.C. § 254(e), States that desire to have ETCs in their state receive funding pursuant to the federal high-cost program must file an annual certification with USAC and the FCC stating that all federal high-cost support provided to such carriers within that state was used in the preceding calendar year and will be used in the following calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Staff recommends the Commission open a docket to collect the required filings by the ETCs and to determine whether the Commission should provide the aforementioned federal high-cost certification letter to the FCC and USAC. An ETC should also include a certification and information to ensure its Kansas Universal Service Fund (KUSF) support was used in 2022 and

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<sup>1</sup> Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, ( May 14, 2012), ¶ 10.

will be used in 2024 appropriately. Each filing should be submitted separately by company, with a copy of the supporting Excel files for Attachments 2 - 4, emailed to Staff at [b.seamans@kcc.ks.gov](mailto:b.seamans@kcc.ks.gov) and [h.bhagat@kcc.ks.gov](mailto:h.bhagat@kcc.ks.gov), concurrent with the filing. The annual “ETC Certification Files” may be downloaded from the Commission’s website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>. **Carriers should be reminded that late or incomplete filings may result in fines or penalties.**

### **BACKGROUND:**

The Federal Telecommunications Act, § 254(e), requires that carriers receiving federal high-cost support shall use the support “*only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.*” (Emphasis added). The FCC delegated responsibility for oversight of § 254(e) to the States. The certification letter to the FCC and USAC, due no later than October 1, 2023, will need to be filed by September 29, 2023, since October 1<sup>st</sup> is a Sunday.

For Kansas’ high-cost ETCs to be eligible to receive federal high-cost support in 2024, the Commission must send a letter to the FCC and USAC stating each ETC named in its letter provided certification that it used its federal high-cost support in the prior year (2022) and will use its federal high-cost support in the following year (2024) in accordance with § 254(e). Specifically, § 54.314(a), states,

States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that *all federal high-cost support* provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section. [Emphasis added].

Carriers are to certify all federal high-cost support receipts,<sup>2</sup> therefore, to ensure Staff’s review and the Commission’s decisions regarding certification meet the obligation to certify *all* federal high-cost support, an ETC should report all federal high-cost support (i.e. ACAM) and not allocate its federal high-cost support. Staff’s review and recommendations regarding ETC certification take into consideration that federal high-cost support may be provided for both voice and broadband services.<sup>3</sup>

For KUSF support certification purposes, the Commission requires an ETC provide information documenting that it appropriately spent its KUSF support and will continue to spend its KUSF

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<sup>2</sup> Federal high-cost support includes: legacy support, safety valve support, Connect America Cost Model support, Connect America Fund support, Alternative Connect America Model support, Rural Broadband Experiment support, and Rural Digital Opportunity Fund support. Any ETC that will receive RDOF support in 2023 and/or 2024 must certify the receipt and use of the support. .

<sup>3</sup> This Docket is to address the annual certification of an ETC’s federal high-cost support. Staff’s recommendation for an ETC to report all federal high-cost support for certification purposes is not intended to address whether or, how, an ETC’s federal high-cost support should be treated in a company-specific proceeding. The rural Local Exchange Carriers (RLECs) filed a request for the Commission to open a docket to address federal high-cost support allocations in Docket No. 23-GIMT-392-GIT.

support appropriately.<sup>4</sup>

## **ANALYSIS:**

### **Kansas ETC Certification Forms**

The Forms and Instructions ETCs will use to certify their Federal and Kansas high-cost support are as follow:

#### **Attachment**

<b><u>No.</u></b>	<b><u>Description</u></b>
1	Certification Form for federal High-Cost and KUSF Support
2a	Kansas' Test for Certification for Incumbent Local Exchange Carriers (ILECs)
2b	Kansas' Test for Certification for ILECs - Illustrative Data
3a	Kansas' Test for Certification for Competitive ETCs
3b	Kansas' Test for Certification for Competitive ETCs - Illustrative Data
4	Narrative Report for New Investments
5	Additional ETC Requirements Adopted in Docket No. 06-GIMT-446-GIT
6	Certification Instructions

Attachment 6 contains the Instructions for completing Attachments 1-5.

- ILECs that received in 2022 and/or will receive federal high-cost support and/or KUSF support in 2024 should complete Attachments 1, 2a, 4, and 5.
- Competitive ETCs that received high-cost support in 2022 and/or will receive federal high-cost support in 2024 need to complete Attachments 1, 3a, 4, and 5.
- Lifeline-Only ETCs need to complete only Attachment 5.

Attachments 2b and 3b are provided for illustration purposes only to assist in the completion of the cost reports in 2a and 3a. Additionally, since Competitive ETCs are eligible to receive federal high-cost support in Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T) exchanges, a Competitive ETC will need to include and certify any federal high-cost support received for AT&T's exchange on Attachments 3a and 4.<sup>5</sup>

Staff notes that in the past,<sup>6</sup> many ETCs reported the net amount of KUSF received after deducting its assessments owed to the Fund. An ETC's statutory requirement to contribute to the KUSF is separate and distinct from its Kansas high-cost support and, therefore, the gross amount of KUSF support received should be reported on Attachments 2a and 3a.

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<sup>4</sup> Order Adopting Staff Workshop Report and Issue Resolutions and Soliciting Additional Comments, Docket No. 08-GIMT-154-GIT, Jan. 30, 2009.

<sup>5</sup> The Commission's Order, Docket No. 07-GIMT-498-GIT, dated Aug. 9, 2007, reaffirmed its previous decision not to certify competitive ETCs' expenditures and investments of federal legacy high-cost support in non-supported areas, which were areas served by AT&T, except to the extent the competitive ETCs can justify an allocation of a portion of expenditures and investments of federal high-cost support to serve a supported area. The federal high-cost Connect America Fund and Rural Digital Opportunity Fund provide support specifically for census blocks in AT&T's and CenturyLink's service area; therefore, expenses and investments related to that funding must be reported.

<sup>6</sup> See Docket No. 18-GIMT-394-ETC.



**Staff Exhibit 1 includes the amount of high-cost KUSF support disbursed to each ETC in 2022. This amount should be reported as the amount of KUSF high-cost support received in 2022. If the carrier believes a different amount should be reported, it should contact Staff.**

**RECOMMENDATION:**

Staff recommends the Commission open a docket to collect the required filings and to determine whether the Commission should certify to the FCC and USAC that all federal high-cost support provided to ETCs in Kansas was used in 2022 and will be used in 2024 in accordance with Section 254(e). The docket should further include a certification and analysis to ensure KUSF support was used in 2022 and will be used in 2024 appropriately.

Staff further recommends all ETCs download the annual “ETC Certification Files” from the Commission’s website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>. Staff recommends the Commission require ETCs and competitive ETCs to submit their ETC certifications and the required worksheets, on or before Friday, June 30, 2023. Each company should be directed to submit a separate filing, with Attachments, and email a copy of the supporting Excel files, for Attachments 2-4 to [b.seamans@kcc.ks.gov](mailto:b.seamans@kcc.ks.gov) and [h.bhagat@kcc.ks.gov](mailto:h.bhagat@kcc.ks.gov). **Carriers should be reminded that late or incomplete filings may result in fines or penalties.**

**KUSF High-Cost Support Paid to ETCs**  
**January - December 2022**  
**(Annual total should match amount reported. Include explanation for any variance)**

<b>Company</b>	<b>Jan. - Dec. 2022 Annual Total (A = B + C + D)</b>	<b>Jan - Feb. 22 Total (FY 25) (B)</b>	<b>March - April 22 Total (FY 26) (C)</b>	<b>May - Dec. 22 Total (FY 26) (D)</b>
Blue Valley	\$ 1,474,230	\$ 257,884	\$ 257,867	\$ 958,479
Columbus	-	-	-	-
Consolidated Communications of Kansas (1)	-	-	-	-
Consolidated Communications of Missouri (2)	-	-	-	-
Craw-Kan	3,450,334	356,001	355,978	2,738,355
Cunningham	789,238	138,057	138,051	513,130
Elkhart	771	137	136	498
Golden Belt	1,620,866	283,532	283,516	1,053,818
Gorham	503,676	88,106	88,101	327,469
H & B	627,511	109,767	109,762	407,982
Haviland	-	-	-	-
Home	508,406	88,933	88,929	330,544
JBN	561,647	98,247	98,241	365,159
KanOkla	628,117	109,874	109,868	408,375
LaHarpe	-	-	-	-
Madison	206,144	36,060	36,058	134,026
Mokan	-	-	-	-
Moundridge	-	-	-	-
Mutual	199,449	34,889	34,887	129,673
Peoples	444,481	77,751	77,747	288,983
Pioneer	3,258,709	570,029	570,003	2,118,677
Rainbow	722,100	126,688	126,228	469,184
Rural	2,413,939	422,258	422,238	1,569,443
S & A	316,387	55,344	55,342	205,701
S & T	1,077,512	188,484	188,475	700,553
South Central	210,032	36,741	36,738	136,553
Southern Kansas	1,088,827	190,462	190,453	707,912
Totah	214,698	37,556	37,554	139,588
Tri-County	1,204,896	210,768	210,756	783,372
Tri-County - Council Grove	880,698	154,057	154,049	572,592
Twin Valley	3,184,399	557,030	557,004	2,070,365
United Telephone Assoc.	1,464,620	256,199	256,186	952,235
Wamego	1,453,765	254,299	254,288	945,178
Wheat State	557,466	97,517	97,510	362,439
Wilson	666,245	116,543	116,537	433,165
Zenda	271,550	47,501	47,498	176,551
United Telephone Companies of Kansas d/b/a CenturyLink (3)	9,137,944	1,565,057	1,505,903	6,066,984
	<u>\$ 39,138,657</u>	<u>\$ 6,565,771</u>	<u>\$ 6,505,903</u>	<u>\$ 26,066,983</u>

Notes:

(1) Effective January 1, 2019, Bluestem Telephone and Sunflower Telephone Company's names were changed to Consolidated Communications of Kansas, Docket No. 19-SFLT-197-CCN.

(2) FairPoint-MO changed its name to Consolidated Communications of Missouri, effective January 1, 2019. Docket No. 19-FCMT-161-CCN.

(3) Reflects KUSF support paid to CenturyLink. Includes prior year KUSF & CAF Support adjustments paid during the year. Docket No. 16-GIMT-511-GIT

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

In the Matter of Certification of Compliance )  
with Section 254(e) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 23-GIMT-644-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 \_\_\_\_\_ of  
\_\_\_\_\_ (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 \_\_\_\_\_ (Company/Cooperative) to the statements  
made in this certification.

2. \_\_\_\_\_ (Company/Cooperative) was named as  
an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal  
support purposes in Docket No. \_\_\_\_\_ by order dated  
\_\_\_\_\_ and KUSF support purposes in Docket No. \_\_\_\_\_ by order  
dated \_\_\_\_\_.

**Docket No. 23-GIMT-644-GIT**  
**Attachment 1**

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 \_\_\_\_\_ (Company/Cooperative) was used in the proceeding calendar year **2022** and will be used in the new calendar year **2024** *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

\_\_\_\_\_  
Printed/Typed Name

Executed on \_\_\_\_\_ date.

Email address: \_\_\_\_\_

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

**23-GIMT-644-GIT  
Attachment 2a**

**Company Name:** \_\_\_\_\_

**DATA YEAR:** 2022

	LINE	REGULATED AMOUNT
<b>WORKING LOOPS</b>		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
3. Consumer Broadband-only Loops	(090)	
 <b>INVESTMENT** Remove all BLS only investments</b>		
1. Plant Accounts		
a. Acct 2001 - Telephone Plant in Service	(160)	
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	
b. Acct 2220 - Operator System Equipment	(235)	
c. Acct 2230 - Central Office Transmission	(240)	
d. Total Central Office Equip	(245)	\$ -
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410 - Cable & Wire Facilities Total	(255)	
 <b>AMORTIZABLE TANGIBLE ASSETS</b>		
Acct. 2680 - Tangible Assets	(800)	\$ -
Acct. 2680 (2230) - Central Office Transmission	(805)	
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	
Acct. 2680 (2410) Cable & Wire Facilities	(815)	
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
 <b>PART 36 - COST STUDY DATA</b>		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		#DIV/0!
4. COE CAT 4.13 Factor		#DIV/0!
5. Switching Factor		1.000000

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

**23-GIMT-644-GIT  
Attachment 2a**

**Company Name:** \_\_\_\_\_

**DATA YEAR:** 2022

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

INVESTMENT, EXPENSE AND TAXES**	LINE	REGULATED AMOUNT
<b>Remove all BLS only amounts</b>		
1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	
b. Total Central Office Equip	(245)	
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)	
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)	
<b>p. Total - Central Office (Acct. 6210 - 6230)</b>	(410)	\$ -
q. Acct 6410 - Cable & Wire Facilities	(430)	
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	
<b>t. Total Plant Specific Expense (Accts. 6110 - 6410)</b>	(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)	
<b>e.Total Corporate Operating Expense         (line 535+550)</b>	(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)	

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

**23-GIMT-644-GIT  
Attachment 2a**

<b>Company Name:</b> _____																																													
<b>DATA YEAR:</b> <b>2022</b>																																													
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**Incumbent ETC Investment and Expenses  
Kansas Test for USF Certification**

**23-GIMT-644-GIT  
Attachment 2a**

<b>Company Name:</b> _____																																																																																															
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**Example**  
**Incumbent ETC Investment and Expense**  
**Kansas Test for USF Certification**

**23-GIMT-644-GIT**  
**Attachment 2b**

**Company Name:** ABC Telephone Company Inc.

	DATA YEAR	<u>2022</u>
	LINE	REGULATED AMOUNT
<b>WORKING LOOPS</b>		
1. Total Loops	(060)	9,552
2. Category 1.3 Loops	(070)	9,262
3. Consumer Broadband-only Loops	(090)	500
 <b>INVESTMENT** Remove all BLS only investments</b>		
1. Plant Accounts		
a. Acct 2001	(160) \$	26,978,955
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	5,247,838
b. Acct 2220 - Operator System Equipment	(235)	0
c. Acct 2230 - Central Office Transmission	(240)	5,962,811
d. Total Central Office Equip	(245) \$	11,210,649
e. Circuit Equip Cat 4.13	(250)	4,061,618
f. Acct 2410 - Cable & Wire Facilities Total	(255)	13,819,015
 <b>AMORTIZABLE TANGIBLE ASSETS</b>		
Acct. 2680 - Tangible Assets	(800)	0
Acct. 2680 (2230) - Central Office Transmission	(805)	0
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	0
Acct. 2680 (2410) Cable & Wire Facilities	(815)	0
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	0
Acct. 6560 (2680) Dep & Amort	(830)	0
 <b>PART 36 - COST STUDY DATA</b>		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	11,811,817
2. Cost Study Avg C&WF Cat 1	(710)	11,718,782
3. C&WF CAT 1 Factor		0.992124
4. COE CAT 4.13 Factor		0.362300
5. Switching Factor		1.000000

**Example**  
**Incumbent ETC Investment and Expense**  
**Kansas Test for USF Certification**

**23-GIMT-644-GIT**  
**Attachment 2b**

**Company Name:** ABC Telephone Company Inc.

**DATA YEAR** 2022

LINE	REGULATED AMOUNT
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**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)	198,228
b. Total Central Office Equip	(245)	480,061
c. Acct 2410 - Cable & Wire Facilities Total	(255)	436,274
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	12,628
b. Acct 6110 - Network Support Benefits	(340)	1,362
c. Acct 6110 - Network Support Rents	(345)	256
d. Acct 6120 - General Support Total	(350)	211,447
e. Acct 6120 - General Support Benefits	(355)	8,068
f. Acct 6120 - General Support Rents	(360)	15,114
g. Acct 6210 - Central Office Switching Total	(365)	236,427
h. Acct 6210 - Central Office Switching Benefits	(370)	36,157
i. Acct 6210 - Central Office Switching Rents	(375)	2,922
j. Acct 6220 - Operator Systems Total	(380)	0
k. Acct 6220 - Operator Systems Benefits	(385)	0
l. Acct 6220 - Operator Systems Rents	(390)	0
m. Acct 6230 - Central Office Transmission Total	(395)	108,923
n. Acct 6230 - Central Office Transmission Benefits	(400)	14,821
o. Acct 6230 - Central Office Transmission Rents	(405)	1,222
<b>p. Total - Central Office (Acct. 6210 - 6230)</b>	(410)	\$ 345,350
q. Acct 6410 - Cable & Wire Facilities	(430)	882,320
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	124,429
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	63,079
<b>t. Total Plant Specific Expense (Accts. 6110 - 6410)</b>	(445)	\$ 1,451,745
3. Expenses - Plant Non Specific Exp		
a. Acct 6530 - Network Operations	(450)	287,767
b. Acct 6530 - Network Operations Benefits	(455)	45,519
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210) - Central Office Switching	(510)	382,435
b. Acct 6560 (#2220) - Operator Systems	(515)	0
c. Acct 6560 (#2230) - Central Office Transmission	(520)	297,063
d. Acct 6560 (#2210-2230) - Total	(525)	679,498
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)	677,375
5. Corporate Operating Expenses		
a. Acct 6710 - Executive & Planning	(535)	73,579
b. Acct 6710 - Executive & Planning Benefits	(540)	17,078
c. Acct 6720 - General Admin	(550)	428,472
d. Acct 6720 - General Admin Benefits	(555)	46,933
<b>e. Total Corporate Operating Expense (line 535+550)</b>	(565)	\$ 502,051
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	425,974
b. Rents Portion	(610)	82,594
Total Expenses (Excluding Depreciation)		\$ 2,241,563
7. Operating Taxes		
a. Acct 7200	(650)	1,073,834

**Example  
Incumbent ETC Investment and Expense  
Kansas Test for USF Certification**

**23-GIMT-644-GIT  
Attachment 2b**

<b>Company Name: <u>ABC Telephone Company Inc.</u></b>	
<b>DATA YEAR <u>2022</u></b>	
LINE	REGULATED AMOUNT
Test for use of FUSF and KUSF	
CAPITAL:	
1. Category 1 C&WF	432,838
2. Category 4.13 COE and Switching	455,759
MAINTENANCE:	
3. CWF - MAINT. EXP.	689,340
4. COE - MAINT. SW	197,348
5. COE - MAINT-OP SYSTEM	0
6. COE - MAINT. - TRANS.	63,266
7. CWF - NETWORK SUPPORT	5,595
8. COE - NETWORK SUPPORT	3,799
9. CWF GENERAL SUPPORT	95,673
10. COE GENERAL SUPPORT	64,963
20. CWF NETWORK OPERATION	123,106
21. COE NETWORK OPERATION	83,591
22. CWF EXEC. & PLANNING	28,713
23. COE EXEC. & PLANNING	19,496
24. CWF GENERAL ADMIN.	193,891
25. COE GENERAL ADMIN.	131,655
26. CWF OPERATING TAXES	545,701
27. COE OPERATING TAXES	370,541
28. CWF BENEFITS - TTL OPER EXP	216,472
29. COE BENEFITS - TTL OPER EXP	146,988
30. CWF RENTS - TTL OPER EXP	41,973
31. COE RENTS - TTL OPER EXP	28,500

**Example**  
**Incumbent ETC Investment and Expense**  
**Kansas Test for USF Certification**

**23-GIMT-644-GIT**  
**Attachment 2b**

<b>Company Name:</b> <u>ABC Telephone Company Inc.</u>			
<b>DATA YEAR</b> <u>2022</u>			
	LINE	REGULATED AMOUNT	
<b>A. Total Cash Expenditures Assd with USF</b>		<b>\$ 3,939,208</b>	
<u>B. Certified Federal USF Receipts:</u>			
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)		2,000,000	
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)		-	
<b>B7. Total Federal USF Receipts</b>		<b><u>\$ 2,000,000</u></b>	
C. Gross KUSF Receipts (do not deduct KUSF assessments paid)		1,000,000	
<b>D. Total FUSF and KUSF Receipts</b>		<b><u>\$ 3,000,000</u></b>	
E. Do Expenditures Exceed FUSF Receipts?		<b>Yes</b>	
Amount Expenditures Exceed Certified FUSF		\$ 1,939,208	[A - B8]
(negative number means FUSF exceeds Expenditures)			
F. Do Expenditures Exceed <b>FUSF &amp; KUSF</b> Receipts?		<b>Yes</b>	
Amount Expenditures Exceed Certified FUSF & KUSF		939,208	[A - D]
(negative number means FUSF & KUSF exceeds Expenditures)			
<b>Please provide the following information:</b>			
<div style="text-align: right;">Contact: <u>John Smith</u></div>			
<div style="text-align: right;">Title: <u>Accountant</u></div>			
<div style="text-align: right;">Phone No.: <u>785-555-1234</u></div>			
<div style="text-align: right;">E-Mail: <u>jsmith@wtci.com</u></div>			

**Competitive ETC Investment and Expense  
Test for USF Certification**

**23-GIMT-644-GIT  
Attachment 3a**

**Company Name :** \_\_\_\_\_

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R. § 54.314 and KCC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at b.seamans@kcc.ks.gov and h.bhagat@kcc.ks.gov.

<b>Data Year</b>	<b>2022</b>
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	AMOUNT FOR KANSAS	ALLOCATION PERCENT	CODE (see Notes)	FUSF AMOUNT FOR FUSF AREAS (INCLUDE SWBT/AT&T Area if support is received for the area) D=AxB
	A	B	C	D=AxB
FUSF WORKING LOOPS/LINES				
<u>NEW INVESTMENTS:</u>				
1. SWITCHING				-
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)				-
<b>SUBTOTAL NEW INVESTMENTS</b>	\$ -			\$ -
<u>EXPENSES:</u>				
3. SWITCH MAINTENANCE				-
4. OUTSIDE PLANT MAINTENANCE				-
5. NETWORK SUPPORT				-
6. ADMINISTRATIVE EXPENSE				-
<b>SUBTOTAL EXPENSES</b>	\$ -			\$ -
<b>A. TOTAL CASH EXPENDITURES ASSD WITH USF</b>	\$ -			\$ -
<u>B. CERTIFIED FUSF RECEIPTS FOR CETCS</u>				
B1. Frozen High Cost Support				\$ -
B2. Mobility Fund Support				
B3. Rural Broadband Experiments Fund				
B4. CAF II Support				
B5. Rural Digital Opportunity Fund				
<b>B5. Total Certified Federal USF Receipts</b>	\$ -			\$ -
<b>C. DO EXPENDITURES EXCEED FUSF RECEIPTS?</b>	<b>No</b>		<b>No</b>	\$ -
(negative number means FUSF exceeds Expenditures)				

**Notes:**

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
  - a. Based on number of switched MOUs from USF supported cell sites.
  - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
  - c. Based on percent of USF served areas to all areas.

Contact Name: \_\_\_\_\_

Title: \_\_\_\_\_

Phone No.: \_\_\_\_\_

E-Mail: \_\_\_\_\_

**Example**  
**CETC Investment and Expense**  
**Test for USF Certification**

**23-GIMT-644-GIT**  
**Attachment 3b**

**Company Name :** Everyday Telephone Company, Inc.

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R. § 54.314 and KCC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at [b.seamans@kcc.ks.gov](mailto:b.seamans@kcc.ks.gov) and [h.bhagat@kcc.ks.gov](mailto:h.bhagat@kcc.ks.gov).

**Data Year**      **2022**

	AMOUNT FOR KANSAS	ALLOCATION PERCENT	CODE (see Notes)	FUSF AMOUNT FOR FUSF AREAS (INCLUDE SWBT/AT&T Area if support is received for the area) D=AxB
	A	B	C	
FUSF WORKING LOOPS/LINES	50,000	N/A		17,500
<b>NEW INVESTMENTS:</b>				
1. SWITCHING	5,000,000	35.00%	a	1,750,000
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)	7,000,000	62.00%	b	4,340,000
<b>SUBTOTAL NEW INVESTMENTS</b>	<b>12,000,000</b>			<b>6,090,000</b>
<b>EXPENSES:</b>				
3. SWITCH MAINTENANCE	1,500,000	75.00%	a	1,125,000
4. OUTSIDE PLANT MAINTENANCE	4,000,000	52.00%	c	2,080,000
5. NETWORK SUPPORT	500,000	52.00%	c	260,000
6. ADMINISTRATIVE EXPENSE	400,000	75.00%	a	300,000
<b>SUBTOTAL EXPENSES</b>	<b>6,400,000</b>			<b>3,765,000</b>
<b>A. TOTAL CASH EXPENDITURES ASSD WITH USF</b>	<b>18,400,000</b>			<b>9,855,000</b>
<b>B. CERTIFIED FUSF RECEIPTS FOR CETCS</b>				
B1. Frozen High Cost Support	\$ 83,500	100%		83,500
B2. Mobility Fund Support				
B3. Rural Broadband Experiments Fund				
B4. CAF II Support				
B5. Rural Digital Opportunity Fund, Phase I				
<b>B6. Total Certified Federal USF Receipts</b>				<b>\$ 83,500</b>
<b>C. DO EXPENDITURES EXCEED FUSF RECEIPTS?</b>	<b>Yes</b>			<b>\$ 9,771,500</b>
(negative number means FUSF exceeds Expenditures)				

**Notes:**

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): [the following are examples only, not a complete list.]
  - a. Based on number of switched MOUs from USF supported cell sites.
  - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
  - c. Based on percent of USF served areas to all areas.

Contact: Robert Jones

Title: Accountant

Phone No.: 316-555-5555

E-Mail: [rjones@edtc.com](mailto:rjones@edtc.com)

**Narrative Report for New Investments**ETC Certification for Use of **USF** Support

Provided to the Kansas Corporation Commission

Company Name: \_\_\_\_\_

Data Year: 2022

					Amount Used in the USF Supported Areas
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	
A	B	C	D	E	F= C x D
<b>Subtotal</b>		\$ -			\$ -
		\$ -			\$ -

NOTES:

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

Contact: \_\_\_\_\_

Phone No.: \_\_\_\_\_

Title: \_\_\_\_\_

E-Mail: \_\_\_\_\_

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

Supplemental  
PagesAmount Used  
in the USF  
Supported  
Areas



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	Number of Customers Affected

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

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

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

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is \_\_\_\_\_ of the \_\_\_\_\_ (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) is in compliance with the 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 \_\_\_\_\_ (date).

\_\_\_\_\_  
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 \_\_\_\_\_ of the \_\_\_\_\_ (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_ (date).

\_\_\_\_\_  
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 \_\_\_\_\_ of the \_\_\_\_\_  
(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 \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_ (date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed / Typed Name

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	Geographic Areas Reached	Dates Published

(If necessary, please attach additional pages.)

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

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

## COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is \_\_\_\_\_ of the \_\_\_\_\_  
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the  
Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding  
\_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

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

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on (date).

Signature

Printed/Typed Name

Kansas Corporation Commission  
ETC Certification Instructions for Attachments 1 - 5

The Kansas Corporation Commission (KCC) requires every Eligible Telecommunications Carrier (ETC) to complete the ETC certification forms as part of the annual ETC certification process.

If you have any questions, please contact the Telecommunications Division at [b.seamans@kcc.ks.gov](mailto:b.seamans@kcc.ks.gov) or [s.reams@kcc.ks.gov](mailto:s.reams@kcc.ks.gov).

**1. Line Definitions:**

**Working Loops for federal High-Cost Supported Services**

Provide the line counts by incumbent local exchange carrier (ILEC) study area or wire center that were reported to the Universal Service Administrative Company (USAC) for the same year as the cost data is reported. Category 1.3 loops and broadband only loops should be reported separately.

**2. Attachments 2 and 3 – ILEC ETC and Competitive ETC Investment and Expense Reports**

**a. ILEC ETC Report Format**

Attachment 2a is used by Incumbent ETCs to report their use of federal high-cost support receipts for the prior year. The report is a modified version of the cost information submitted to USAC for legacy high-cost support, with the prior year data used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually used to provide universal service in the supported areas for which the support was paid.<sup>1</sup> Support should be segregated by the type of federal high-cost support received. Include all federal high-cost support.

KUSF support is required to be certified and, similar to federal support, KUSF support must be used to provide and maintain universal service. **All Federal and KUSF high-cost support reported should reflect the gross amount, not the net amount received after deducting assessments owed to the Fund. Lifeline support receipts should not be included in the amount of high-cost support received. The high-cost KUSF amount listed on Staff Exhibit 1 should be reported for KUSF high-cost support.**

Attachment 2b is an example of how to complete Form 2a.

**b. Competitive ETC (CETC) Report Format**

Attachment 3a is used by CETCs to report their use of federal high-cost funds received in the prior year. Prior year data is used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually expended to provide

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<sup>1</sup> Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

Kansas Corporation Commission  
ETC Certification Instructions for Attachments 1 - 5

universal service in the supported areas for which the support was paid.<sup>2</sup> If no universal service support was received for the prior year, the company should file a statement to that effect. Cost information is split by new investment expenditures and expenses. This is compared to the amount of federal high-cost support received. **High-cost support reported should be the gross amount, not the net amount received after deducting assessments.**

Attachment 3b is an example showing how to complete Form 3a.

The company should exclude the cost of transport between switches to ensure consistent reporting with the costs submitted by the Incumbent ETCs. Once a call leaves the local switch, it is on the interoffice network and costs for those facilities are not included. The switch is the device that provides dial tone and/or switching the call to the proper location for termination. This can be a smart remote with stand-alone capability<sup>3</sup> or a stand-alone/host switch.

**c. Allocation Methods**

The cost reports attempt to capture the cost to provide universal service and exclude certain types of investments and expenses. The FCC has deregulated some services, including voice messaging and inside wire; therefore, they should be excluded.

The allocation of new investments and expenses play an important role in properly identifying the costs associated with USF supported areas. Incumbent LECs utilize a series of allocation rules via Part 36 Separations Rules that are specific and documented. However, even ILECs may encounter situations where only a portion of their territory receives high-cost support.

CETCs may serve exchanges that are supported and areas that are not supported. Some costs may be specific to the supported area, while others may involve both areas. A number of valid methods are available to make these allocations. Below is a list of examples that will normally be acceptable in making allocations:

Outside plant projects –the supported areas’ allocations can be determined as follow:

1. Identify the specific costs in supported areas and assign it as a qualified cost.
2. Determine the number of lines in the supported area versus the total lines served by the facilities. Do not include broadband-only use lines.
3. Determine the geographic area in the supported area versus the total area served (this method is especially applicable to cellular towers).
4. Calculate the percent of miles on a cable that serves a supported area versus the total miles to all the areas.

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<sup>2</sup>*Ibid.*

<sup>3</sup> A smart remote with stand-alone capability is one that can still provide local calling even if its link to the host switch is severed.

Kansas Corporation Commission  
ETC Certification Instructions for Attachments 1 - 5

5. Calculate the percent of fiber strands or cable pair that go to a supported area versus the total strands in service.

Expenses may be allocated based on the allocation determined for the related investment, or based on a percentage of lines or customers in the supported areas.

Maintenance expense may be allocated based on the number of items being maintained that are in the supported areas.

**Switching may be allocated using the following methods:**

1. Calculate the percent of Minutes of Use (MOU) for the lines in the supported area versus all minutes.
2. Calculate the percent of lines in the supported area versus all lines served by the switch.
3. Similar allocations could apply to circuit equipment used for switched access.

**General rules to follow when deciding on the allocation method:**

1. Allocations may be calculated by individual investment location, by region or for the whole state.
2. Companies may decide which methods work best based on the accounting and network information they have available.
3. Methods can vary for different types of investment or expense.
4. The method is one that is appropriate for the item being allocated (i.e. MOU would be appropriate for a switch allocation but not for a loop).
5. The allocation is based on measurable data.
6. The method captures a reasonable cost of the investment and/or expense.
7. The company should maintain consistency in the allocation methods used from year to year when providing data to the Commission. This will avoid gaming the system and provide the ability to make comparisons from year to year.
8. When a company changes an allocation method, it should be noted in the data submission, complete with rationale explaining why this new method is more appropriate. Also, the company should provide a calculation of what effect the new allocation would have on the prior year's report.

**4. Attachment 4 - New Investments Utilizing High-Cost Support in Supported Areas**

**a. Report Format**

For the prior calendar year, provide a description of the new investments in supported areas where the high-cost support was used. Please use a format similar to the *Narrative for New Investment Report*. The first example is for a wireless ETC and the second example is for a wireline ETC. It is acceptable to submit a mechanized report if it contains the essential information. Any projects over the threshold should be listed separately. Those projects less than the threshold should be combined into one or more line items. See 3b below for the threshold.

Kansas Corporation Commission  
ETC Certification Instructions for Attachments 1 - 5

**EXAMPLE of Narrative for New Investment Report**

**EXAMPLE of a WIRELESS COMPANY**

					Amount Used in the USF Supported Areas
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	
A	B	C	D	E	F=C x D
20 miles West of Oakley serving USF areas: Levant, Winona, and Russell Springs.	New tower and fiber trunking.	\$300,000	70%	[1]	\$210,000
Wichita - Serves all customers in Kansas.	Switch Software Upgrade.	\$250,000	25%	[2]	\$50,000
<b>TOTAL</b>		<b>\$550,000</b>			<b>\$260,000</b>

**NOTES**

[1] Percent of the service area that is USF supported on geography served.

[2] Percent of switch that is USF supported based on lines served.

**EXAMPLE of a WIRELINE COMPANY**

					Amount Used in the USF Supported Areas
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	
A	B	C	D	E	F=C x D
Buffalo, Quincy, Toronto	Replaced OSP with digital line carrier and fiber feeder	\$1,250,000	100%	[1]	\$1,250,000
Eureka thru Hamilton, Quincy, Yates Center, Chanute, Fredonia, Fall River & serves USF areas: Buffalo, Toronto, Altoona, Benedict, and Coyville.	Fiber ring from remote terminals to remote switch in Eureka.	\$800,000	50%	[2]	\$400,000
<b>TOTAL</b>		<b>\$2,050,000</b>			<b>\$1,650,000</b>

**NOTES**

[1] All of the exchanges in this project are USF supported.

[2] Percent of lines served by the fiber ring in the USF supported exchanges.

The objective of this report is to identify that new investment is being spent to benefit supported areas. Listing individual exchanges that will benefit will help meet this purpose.



Kansas Corporation Commission  
ETC Certification Instructions for Attachments 1 - 5

b. Threshold - For companies spending less than \$10M in new projects in Kansas, use \$200,000 as the project threshold. For companies spending \$10M or more, use \$500,000 as the project threshold. It is acceptable to provide more detail than the threshold requires if it helps identify which supported areas are receiving benefit.

**5. Attachment 5 - Annual Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT.**

Provide the information requested on the Attachment. Attach additional pages, as necessary. All ETCs must complete Questions 1-6. Only Competitive ETCs need to complete Question 7. **If the answer to a question is zero, please report zero and not N/A.**

## CERTIFICATE OF SERVICE

23-GIMT-644-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 03/21/2023.

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23-GIMT-644-GIT

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## CERTIFICATE OF SERVICE

23-GIMT-644-GIT

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## **CERTIFICATE OF SERVICE**

23-GIMT-644-GIT

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23-GIMT-644-GIT

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