

July 19, 2019

State Corporation Commission  
State of Kansas  
1500 SW Arrowhead Rd  
Topeka, KS 66604-4027

Re: *Consumer Cellular, Incorporated Company-Specific Traffic Report*  
Docket No. 19-GIMT-056-GIT

Dear Sir or Madam:

Pursuant to K.S.A. 2006 Supp. 66-1220a, please accept the attached Percent Interstate Usage Study for Kansas as a public document.

Feel free to contact me if you have any questions.

Respectfully,



Jill Leonetti  
Treasurer  
Consumer Cellular, Inc  
971.223.3015  
tax@consumercellular.com



**NOTICE OF TRAFFIC STUDY UTILIZED BY  
CONSUMER CELLULAR, INCORPORATED**

**AFFIDAVIT OF JILL LEONETTI**

STATE OF OREGON, County of Washington) ss:

I, Jill Leonetti, being first duly sworn, depose and say:

1. I am the Treasurer of Consumer Cellular, Incorporated ("CCI"). My business address is 12447 SW 69<sup>th</sup> Ave., Portland, OR 97223-8517. In this capacity, I am responsible for, *inter alia*, reporting and remittances relating to the Kansas Universal Service Fund ("KUSF") for CCI.

2. CCI's allocation methodology for KUSF purposes is based on a company-specific traffic report. CCI's company-specific traffic report is used for both Federal Universal Service Fund ("FUSF") and KUSF purposes. This method is accepted by the Federal Communications Commission for FUSF reporting purposes.

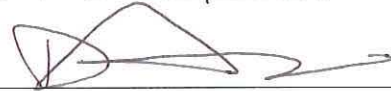
3. CCI uses the inverse of the federal percentage derived therewith to calculate the percentage for KUSF reporting purposes ( $100\% - \text{FUSF \%} = \text{KUSF \%}$ ). This approach provides a fair and balanced symmetry between federal and state USF programs, and complies with the Commission's directive that carriers use the same allocation methodology for FUSF and KUSF purposes.

4. CCI applies the KUSF percentage to its Kansas retail revenues to determine the amount it remits to the KUSF for the months of July – September 2019.

5. The intrastate factors used by CCI for KUSF purposes are filed separately under seal.

  
Jill Leonetti

SIGNED AND SWORN TO before me this 25 day of JULY 2019 by Jill Leonetti.





Notary Public for Oregon  
My commission expires: 02/08/22