

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of Certification of Compliance )  
with Section 254(e) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 24-GIMT-612-GIT  
Certification of Appropriate Use of Kansas )  
Universal Service Fund Support )

**SOUTHERN KANSAS TELEPHONE CO., INC.**  
**ELIGIBLE TELECOMMUNICATIONS CARRIER**  
**CERTIFICATION AND INFORMATION**

Pursuant to Order of the Commission herein Southern Kansas Telephone Co., Inc. submits its certification and information supporting its continuing designation as an Eligible Telecommunications Carrier.

Southern Kansas Telephone Co., Inc.'s attachments other than Attachments 1 and 5 certifications are filed herewith as proprietary and confidential under seal. The carrier believes that the information contained in these attachments are of such competitive sensitivity that disclosure to any person other than the carrier, the Commission, and Staff is prohibited by K.S.A. 66-1220(a). Disclosure of trade secrets and confidential information to any person, including parties to this proceeding, is prohibited unless the Commission finds the disclosure is warranted, after considering all of the factors in that statute. The carrier believes that disclosure of the information contained in these attachments would have a significant and adverse impact on its competitive stance regarding existing or potential competing entities including wireless carriers, competitive local exchange carriers, and incumbent local exchange carriers. Regulatorily mandated disclosure of any or all of the subject information would create a competitive bias in favor of any actual or potential competitor not required to provide comparable

information, reducing or eliminating any benefit to consumers otherwise resulting from unbiased competition and damaging the submitting company's ability to engage in fair competition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Doty". The signature is written in a cursive style with a horizontal line underneath it.

Mark Doty #14526  
GLEASON & DOTY, CHARTERED  
401 S. Main, Suite 102  
Ottawa, KS 66067  
(785) 242-3775  
Attorney for Southern Kansas Telephone Co.,  
Inc.

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

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

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**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 Chief Operating Officer of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. (Company/Cooperative) to the statements made in this certification.

2. The Southern Kansas Telephone Company, Inc. (Company/Cooperative) was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997 and KUSF support purposes in Docket No.98-GIMT-241-GIT by order dated December 5, 1997.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by The Southern Kansas Telephone

**Docket No. 24-GIMT-612-GIT  
Attachment 1**

Company, Inc. (Company/Cooperative) was used in the proceeding calendar year 2023 and will be used in the new calendar year 2025 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.)

DocuSigned by:  
William McVey  
BY 3606FAAB244FB...  
Signature

William R. McVey  
Printed/Typed Name

Executed on 6/26/2024 date.

Email address: BMcVey@twinvalley.com

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

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)? **(Yes/No) YES . 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
1/4/23 10:40	Cox cut the fiber which disabled all phone service. Tech repaired the cut to restore service.	All phone	Atlanta, Burden, Dexter, Grenola, Longton	N/A – third party at fault	All

(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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**24-GIMT-612-GIT  
Attachment 5**

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

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION  
KCC Docket Reference: 06-GIMT-446-GIT  
(Please type or print legibly)**

1. My title is Chief Operating Officer of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. to the statements made in this certification.

2. By this affidavit, I certify that The Southern Kansas Telephone Company, Inc. 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 6/27/2024 (date).

DocuSigned by:  
William McVey  
B73606FAAB244EB...  
Signature  
William R. McVey  
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 Chief Operating Officer of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. to the statements made in this certification.

2. By this affidavit, I certify that The Southern Kansas Telephone Company, Inc. 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 6/27/2024 \_\_\_\_\_ (date).

DocuSigned by:  
  
 B73606FAAB244FB...  
 Signature  
 William R. McVey  
 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
See Attached			

(If necessary, please attach additional pages.)

**24-GIMT-612-GIT  
Attachment 5**

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

N/A  
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**COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is Chief Operating Officer of The Southern Kansas Telephone Company, Inc. (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 The Southern Kansas Telephone Company, Inc. to the statements made in this certification.

2. By this affidavit, I certify that The Southern Kansas Telephone Company, Inc. 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 6/27/2024 (date).

DocuSigned by:  
William McVey  
B73606FAAB244FB...

Signature

William R. McVey

Printed/Typed Name

Reference	Type of Media	Geographic Area Reached	Dates Published
SKT Bill Advertisements	Bills	SKT Service Areas	12 Months
Google Ads	Internet	SKT Service Areas	12 Months
SKT Facebook Page	Internet	SKT Service Areas	12 Months
SKT Instagram	Internet	SKT Service Areas	12 Months
SKT LinkedIn	Internet	SKT Service Areas	12 Months
SKT Webmail Page	Internet	SKT Service Areas	12 Months
SKT Website	Internet	SKT Service Areas	12 Months
Prairie Star	Newspaper	Atlanta, Burden, Cambridge, Elk Falls, Grenola, Latham, and Longton, Kansas	12 Months
The Cowley Courier-Traveler	Newspaper	Atlanta, Burden, Cambridge, and Dexter,	12 Months
The Times-Sentinel	Newspaper	Clearwater and Viola, Kansas	12 Months
Wichita Business Journal	Newspaper	Greater Wichita Area	12 Months
Butler-Greenwood County Directory	Printed telephone directory	Butler and Greenwood Counties	Annual Publication
SKT Clearwater and Viola Telephone Directory	Printed telephone directory	Clearwater and Viola, Kansas	Annual Publication
SKT Clearwater and Viola Telephone Directory	Printed telephone directory	Clearwater and Viola, Kansas	Annual Publication
SKT Southeast Kansas Telephone Directory	Printed telephone directory	Atlanta, Beaumont, Burden, Cambridge, Dexter, Elk Falls, Grenola, Latham, Longton, Piedmont, Reece, and Rosalia,	Annual Publication
SKT Hold Messages	Telephone	SKT Service Areas	12 Months