

December 11, 2024

Ms. Lynn M. Retz Executive Director Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027

RE: Docket No. 24-USCZ-106-KSF

In the Matter of the Audit of USCOC of Nebraska/Kansas LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022 - February 2023

Dear Ms. Retz:

On May 21, 2024, the Kansas Corporation Commission (KCC or Commission) issued an Order adopting Vantage Point Solutions' (VPS) Audit Report and directed USCOC of Nebraska/Kansas LLC (USCOC or Company) to: (1) file audit True-ups for Fiscal Years (FYs) 25, 26, and 27 to exclude its international calling usage revenues from its reporting; (2) issue one-time billing credits in the amount of \$2,236.20 to its affected customers, on a pro-rata basis; (3) update its billing system to exclude KUSF surcharge collection from international calling usage revenues; (4) update its KUSF reporting procedures to exclude the reporting of its international calling usage revenues; and (5) provide VPS with ten (10) customer bills supporting that the refund process has been completed.

The KCC also directed the Company to file an affidavit, signed by an officer of the Company, attesting that the Company: (1) corrected its KUSF reporting procedures to omit international calling usage revenues from its reporting revenues; and (2) corrected its billing system to exclude KUSF surcharge collection from international calling usage revenues; (3) issued refunds, through one-time billing credits, totaling \$2,236.20, to its affected customers, on a pro-rata basis.

On June 4, 2024, the Company filed a Petition for Reconsideration in the Docket petitioning the Commission to grant an extension for its compliance obligations to November 18, 2024.

On July 2, 2024, the Commission issued an Order granting USCOC's request for an extension to November 18, 2024.

On November 13, 2024, USCOC filed the annual True-ups for Fiscal Year 25, 26, and 27 to omit the international calling usage revenues from its reporting.

On November 15, the Company filed, in the Docket, an affidavit, signed by an officer of the Company, attesting that it has: (1) corrected its KUSF reporting procedures to exclude international calling usage revenues from its reporting revenues; (2) corrected its billing system to exclude KUSF surcharge collection from international calling usage revenues; (3) issued refunds through one-time billing credits, in excess of \$2,236.20, to its affected customers on a pro-rata basis; and (4) enclosed ten (10) customer bills supporting that the refund process has been completed.

Also, on November 15, 2024, the Company filed, in the Docket, ten (10) redacted customer invoices supporting that the refund process has been completed as an attachment to the affidavit.

VPS recommends that the Commission determine USCOC is in compliance with the Commission's Order and that Docket No. 24-USCZ-106-KSF be closed.

Sincerely,

Shomari Jackson

Shomai L. fockson

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of December 2024, the above Kansas Universal Service Fund Audit Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

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Shomari Jackson

## **Dawn Cartellone**

From: Dawn Cartellone

Sent: Wednesday, December 11, 2024 9:08 AM

To: lynn.retz@ks.gov; Brett Berry [KCC]; brian.fedotin@ks.gov; brian.fedotin@ks.gov; Lisa A.

Gilbreath; Cassioppi, Stephanie L; adriana.welton@uscellular.com

Cc: Dennis Smith; Shomari Jackson; Nicole Stephens; Wendy Harper

**Subject:** Kansas USF FY26 - USCOC (corrected)

**Attachments:** USCOC Compliance Report 2024-12-11 EFILED.pdf

The attached Compliance Report has been filed with the KCC.

## **Dawn Cartellone**

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