BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Petition of Wamego)
Telecommunications Company, Inc. for an) Docket No. 20-WTCT-139-CXB
Order Modifying the Boundary of its Wamego)
Local Exchange Area)

PETITION FOR RECONSIDERATION

COMES NOW Wamego Telecommunications Company, Inc. ("Wamego"), and requests that the Commission grant reconsideration of its Order of November 26, 2019 in the above-entitled proceeding as specified herein. In support of this Petition for Reconsideration Wamego states:

- 1. Wamego requests reconsideration of that portion of the subject Order contained in paragraph 5. describing its service area after the grant of its application. That description, provided by Wamego, contained an error which was not detected prior to the entry of the order. The error did not impact the territory being transferred from the Century Link Alma exchange to Wamego.
- 2. The description contained in the November 26, 2019 order is set forth below with the erroneous portion in bold and underlined:

Beginning at a point ¼ mile south of the northwest corner of Section 10, T 8 S, R 11 E, Pottawatomie County, Kansas; thence south 1 ¼ miles; thence east 3 ¾ miles; thence south 3 ½ miles; thence east 3 ¼ mile; thence south 2 ½ miles; thence west 3 miles; thence south ¾ mile; thence west ½ mile; thence south ¾ mile; thence south 3 ¼ mile; thence west 3 ¼ mile to the southwest corner of Section 23, T 9 S, R 11 E; thence south approximately 3 ¾ miles to the center of the Kansas River; thence in a westerly direction along the center line of said river to a point ¼ mile east of the east line of Section 7, T 10 S, R 11 E; thence south approximately 2 ½ miles to a point ¼ mile east and ¼ mile north of the southwest corner of Section 20, T 10 S, R 11 E, Wabaunsee County, Kansas; thence east 1 mile; thence south 1 ½ miles;

thence west 1 mile; thence south ½ mile; thence west approximately 1 \% miles to a point ¼ mile north and ¼ mile west of the northeast corner of Section 1, T 11 S, R 10 E; thence south 1 1/8 miles; thence west to a point 1712 feet east and north 660 feet from the N.E. corner of the NW ¼ of Sec. 10, T 11 S, R 10 E thence south 1601 feet, thence west 967 feet, thence south 276 feet, thence west to the existing centerline of Highway K-99, thence north and northwesterly along the existing centerline of Highway K-99 to a point on an east–west line 660 feet north of the north line of Section 10, T 11 S, R 10 E, thence west to the northwest corner of Section 10, T 11 S, R 10 E; thence south 1 1/8 miles; thence west 1 mile; thence south 1 mile; thence west 1 mile to the southeast corner of Section 18, T 11 S, R 10 E, Wabaunsee County, Kansas; thence south ¼ mile; thence West ¾ mile; thence north ½ mile; thence west 2 ¾ miles; thence north 3 ½ miles to a point ½ mile west of the northeast corner of Section 3, T 11 S, R 9 E, Riley County, Kansas; thence to a point ½ mile west of the southeast corner of section 34, T 10 S, R 9 E; thence north approximately 3 ¼ miles to the center of the Kansas River; thence in an easterly direction along the center line of said river to a point ¼ mile west of the east line of section 23, T 10 S, R 9 E; thence north to a point ¼ mile north and ¼ mile west of the southeast corner of Section 11, T 10 S, R 9 E, Pottawatomie County, Kansas; thence west 1 ½ miles; thence north ½ mile; thence west 3/8 mile; thence north 1 3/8 miles; thence east 1/2 mile; thence north 7 1/4 miles to a point ¼ mile west and ½ mile north of the southeast corner of Section 27, T 8 S, \overline{R} 9 E; thence east 1 $\frac{3}{4}$ miles; thence north 2 $\frac{1}{4}$ miles; thence east 1 $\frac{3}{4}$ miles; thence north 1 mile; thence east 7 \(\frac{3}{4} \) miles to the point of beginning.

3. The correct description should be as follows, with the corrected portion in bold and underlined:

Beginning at a point ¼ mile south of the northwest corner of Section 10, T 8 S, R 11 E, Pottawatomie County, Kansas; thence south 1 ¼ miles; thence east 3 ¾ miles; thence south 3 ½ miles; thence east ¾ mile; thence south 2 ½ miles; thence west 3 miles; thence south 34 mile; thence west 1/8 mile; thence south 34 mile; thence west \% mile to the southwest corner of Section 23, T 9 S, R 11 E; thence south approximately 3 \(\frac{3}{4} \) miles to the center of the Kansas River; thence in a westerly direction along the center line of said river to a point ¼ mile east of the east line of Section 7, T 10 S, R 11 E; thence south approximately 2 ½ miles to a point ¼ mile east and ¼ mile north of the southwest corner of Section 20, T 10 S, R 11 E, Wabaunsee County, Kansas; thence east 1 mile; thence south 1 ½ miles; thence west 1 mile; thence south ½ mile; thence west approximately 1 \% miles to a point ¼ mile north and ¼ mile west of the northeast corner of Section 1, T 11 S, R 10 E; thence south 1 1/8 miles; thence west to a point 1712 feet east and north 660 feet from the N.E. corner of the NW ¼ of Sec. 10, T 11 S, R 10 E thence south 1601 feet, thence west 967 feet, thence south 276 feet, thence west to the existing centerline of Highway K-99, thence north and northwesterly along the existing centerline of Highway K-99 to a point on an east-west line 660 feet north of the north line of Section 10, T 11 S, R 10 E, thence west along said line to a point **660 feet north of** the northwest corner of Section 10, T 11 S, R 10 E; thence south

1 ½ miles; thence west 1 mile; thence south 1 mile; thence west 1 mile to the southeast corner of Section 18, T 11 S , R 10 E, Wabaunsee County, Kansas; thence south ¼ mile; thence West ¾ mile; thence north ⅓ mile; thence west 2 ¾ miles; thence north 3 ½ miles to a point ½ mile west of the northeast corner of Section 3, T 11 S, R 9 E, Riley County, Kansas; thence to a point ½ mile west of the southeast corner of section 34, T 10 S, R 9 E; thence north approximately 3 ¼ miles to the center of the Kansas River; thence in an easterly direction along the center line of said river to a point ¼ mile west of the east line of section 23, T 10 S, R 9 E; thence north to a point ¼ mile north and ¼ mile west of the southeast corner of Section 11, T 10 S, R 9 E, Pottawatomie County, Kansas; thence west 1 ½ miles; thence north 5% mile; thence west 3% mile; thence north 1 3% miles; thence east ½ mile; thence north 7 ¼ miles to a point ¼ mile west and ½ mile north of the southeast corner of Section 27, T 8 S, R 9 E; thence east 1 ¾ miles; thence north 2 ¼ miles; thence east 1 ¾ miles; thence east 1 ¾ miles; thence north 2 miles; thence east 1 ¾ miles; thence east 1 ¾ miles to the point of beginning.

WHEREFORE Wamego requests the Commission's reconsideration of its Order of November 26, 2019 in this proceeding and thereupon the issuance of an Order adopting the correct the legal description of the Wamego exchange area as set forth herein.

Respectfully submitted,

Thomas E. Gleason, Jr. #7741

GLEASON & DOTY, CHARTERED

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Attorney for Wamego Telecommunications Company, Inc.

VERIFICATION

STATE OF KANSAS)) ss:	
) ss: COUNTY OF DOUGLAS)	
Thomas E. Gleason, Jr., of lawful age, being first duly sworn upon oath, states:	
I am an attorney for Wamego Telecommunications Company, Inc. I have read	
the above and foregoing Petition, and upon information and belief, state that the	
matters therein appearing are true and correct.	
Thomas E. Gleason, Jr.	
Thomas E. Gleason, Jr	
SUBSCRIBED AND SWORN to before me this 6th day of December 2019.	
2019. Our L. Gard ner Notary Public	
My Commission Expires:	
8 - 29 - 2020 NOTARY PUBLIC - State of Kansas ANN L. GARDNER My Appt. Exp. 8 - 29 - 2020	

CERTIFICATE OF SERVICE

I, the undersigned Thomas E. Gleason, Jr., attorney for the petitioner, hereby certify that on December ___6,2019 I served electronically a true and correct copy of the above and foregoing Amended Petition on the following:

WALKER HENDRIX, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 w.hendrix@kcc.ks.gov

Thomas E. Gleason, Jr.