



GVNW CONSULTING, INC.

2270 LA MONTANA WAY (80918)
P.O. BOX 25969 (80936)
COLORADO SPRINGS, CO
TEL. 719.594.5800
FAX 719.594.5803
www.gvnw.com

September 9, 2015

Ms. Amy Gilbert
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

RE: Docket No. 15-OOMC-052-KSF
*In the Matter of the Audit of Ooma, Inc. by the Kansas Universal Service Fund (KUSF)
Administrator to K.S.A. 2013 Supp. 2010(b) for KUSF Operating Year 17, Fiscal Year
March 2013 - February 2014.*

Dear Ms. Gilbert:

GVNW Consulting, Inc. (GVNW) filed its Audit Report on June 21, 2015, regarding Ooma, Inc. (Ooma or Company). The Audit Report identified five (5) KUSF reporting issues: 1) Ooma applied the KUSF surcharge to non-assessable international revenues and reported the related \$579.80 revenues to the KUSF and collected \$556.55 from customers; 2) the Company did not report revenues related to its Additional Number Services to the KUSF, thereby owing an additional \$31.07 to the KUSF; 3) Ooma did not clearly identify the KUSF surcharge on its customers' bills; 4) Ooma reported calculated revenues, to include Federal Universal Service Fund (USF) and Telephone Relay Service (TRS) revenues to the KUSF and overpaid its assessment by \$1,946.33; and 5) the Company provides its subscribers a "free" basic residential telecommunications services bundle with the purchase of the Ooma Telco Customer Premise Equipment (CPE) device and the payment of the applicable taxes and fees. The Audit Report addressed one (1) Policy issue - Ooma reported revenues net of customer discounts to the KUSF.

On August 4, 2015, the Kansas Corporation Commission (KCC or Commission) issued an Order adopting GVNW's Audit Report and directing Ooma to submit to GVNW Audit True-ups for Operating Years 17 and 18 and quarterly Audit True-ups for Operating Year 19 to reflect all corrections to GVNW's findings. The Commission also directed the Company to provide copies or screen images of customer bills to GVNW that clearly demonstrates the KUSF surcharge as a separate line item. The Audit True-ups and copies or screen images of customer bills were to be provided to GVNW within thirty (30) days from the date the Order. GVNW was directed to submit an update to the Commission.

Ooma submitted screen images of customer bills and the required Audit True-ups to GVNW on September 2, 2015. The screen images of customer bills validates that Ooma has changed its billing system to identify the KUSF surcharge as a separate line item. The Audit True-ups established that for the period March 2013 through April 2015, based on Audit Findings 1, 2, and 4, Ooma over-paid \$2,495.06 in assessments to the KUSF. Of this amount, \$556.55

should be refunded to the Company's customers through one-time, equal billing credits to its customers.

GVNW recommends that the KCC issue an order directing: 1) the KUSF Administrator to make a one-time refund of \$2,495.06 to the Company for over-payment of its assessments; and 2) Ooma, within sixty (60) days from the date of such Order, to issue refunds in the amount of \$556.55 through one-time equal billing credits to its current customers. Upon completion of the refunds, the KCC should direct the Company to provide GVNW with a signed affidavit attesting to the issuance of the refunds, the total amount refunded to customers, and copies of customer bills to substantiate that Ooma issued the refunds. If Ooma is unable to complete the ordered refunds within the 60 day period, GVNW recommends that the Company be directed to file in this Docket an explanation explicitly outlining why it is unable to comply with the 60 day refund requirement and identify the timeframe within which the Company expects the refund to be completed. Once GVNW has reviewed and verified the refunds, it will provide an update to the Commission.

Sincerely,

A handwritten signature in dark ink, appearing to be 'DW' followed by a stylized flourish.

David Winter
Senior Consultant

cc: Sandy Reams

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 2015, the above Kansas Universal Service Fund First Compliance Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

Otto Newton, Litigation Counsel
Otto Newton
1500 SW Arrowhead Road
Topeka, KS 66604
Email: o.newton@kcc.ks.gov

Regulatory & Government Affairs
OOMA, Inc.
1880 Embarcadero Road
Palo Alto, CA 94303

Pranali Khadpe
Program Manager
OOMA, Inc.
1880 Embarcadero Road
Palo Alto, CA 94303
Email: Pranali.khadpe@ooma.com


David G. Winter