

COLLEEN R. JAMISON
JAMISON LAW, LLC

June 24, 2025

Celeste Chaney-Tucker
Executive Director, Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604

RE: S&T Telephone Cooperative Assoc., Inc.
Docket No. 25-GIMT-332-GIT
254(e) certifications

Dear Ms. Chaney-Tucker:

On behalf of S&T Telephone Cooperative Assoc., Inc., attached please find for filing in Docket No. 25-GIMT-332-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 30, 2025 (Attachments 1, 2a, 4, and 5).

In this filing, the entirety of Attachments 2a and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Cordially yours,

Colleen R. Jamison

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JAMISON LAW, LLC

Encl.

cc: Christina Hickert
Hannah Hart
Tina Cohan

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 25-GIMT-332-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

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 CEO of S&T Telephone Cooperative Association (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, Enhanced Alternative Connect America Cost Model (Enhanced ACAM), 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 S&T Telephone Cooperative Association (Company/Cooperative) to the statements made in this certification.

2. S&T Telephone Cooperative Association (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) 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.

Docket No. 25-GIMT-332-GIT
Attachment 1

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, Enhanced ACAM, RBE, RDOF, and/or KUSF received by S&T Telephone Cooperative (Company/Cooperative) was used in the proceeding calendar year **2024** and will be used in the new calendar year **2026** *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.)

Zack Odell

Zack Odell (Jun 17, 2025 14:40 CDT)

Signature

Zack Odell

Printed/Typed Name

Executed on 17/06/2025 date.

Email address zack.odell@sttelcom.com

Company Name: <u>S&T Telephone Cooperative Association</u>		
DATA YEAR: <u>2024</u>		
	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
3. Consumer Broadband-only Loops	(090)	
INVESTMENT** Remove all BLS only investments		
1. Plant Accounts		
a. Acct 2001 - Telephone Plant in Service	(160)	
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	
b. Acct 2220 - Operator System Equipment	(235)	
c. Acct 2230 - Central Office Transmission	(240)	
d. Total Central Office Equip	(245)	
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410 - Cable & Wire Facilities Total	(255)	
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 - Tangible Assets	(800)	
Acct. 2680 (2230) - Central Office Transmission	(805)	
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	
Acct. 2680 (2410) Cable & Wire Facilities	(815)	
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
PART 36 - COST STUDY DATA		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		
4. COE CAT 4.13 Factor		
5. Switching Factor		

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2024

For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year

INVESTMENT, EXPENSE AND TAXES**

Remove all BLS only amounts

	LINE	REGULATED AMOUNT
1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 - Cable & Wire Facilities Total	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	
b. Acct 6110 - Network Support Benefits	(340)	
c. Acct 6110 - Network Support Rents	(345)	
d. Acct 6120 - General Support Total	(350)	
e. Acct 6120 - General Support Benefits	(355)	
f. Acct 6120 - General Support Rents	(360)	
g. Acct 6210 - Central Office Switching Total	(365)	
h. Acct 6210 - Central Office Switching Benefits	(370)	
i. Acct 6210 - Central Office Switching Rents	(375)	
j. Acct 6220 - Operator Systems Total	(380)	
k. Acct 6220 - Operator Systems Benefits	(385)	
l. Acct 6220 - Operator Systems Rents	(390)	
m. Acct 6230 - Central Office Transmission Total	(395)	
n. Acct 6230 - Central Office Transmission Benefits	(400)	
o. Acct 6230 - Central Office Transmission Rents	(405)	
p. Total - Central Office (Acct. 6210 - 6230)	(410)	
q. Acct 6410 - Cable & Wire Facilities	(430)	
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	
t. Total Plant Specific Expense (Accts. 6110 - 6410)	(445)	
3. Expenses - Plant Non Specific Exp		
a. Acct 6530 - Network Operations	(450)	
b. Acct 6530 - Network Operations Benefits	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210) - Central Office Switching	(510)	
b. Acct 6560 (#2220) - Operator Systems	(515)	
c. Acct 6560 (#2230) - Central Office Transmission	(520)	
d. Acct 6560 (#2210-2230) - Total	(525)	
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)	
5. Corporate Operating Expenses		
a. Acct 6710 - Executive & Planning	(535)	
b. Acct 6710 - Executive & Planning Benefits	(540)	
c. Acct 6720 - General Admin	(550)	
d. Acct 6720 - General Admin Benefits	(555)	
e.Total Corporate Operating Expense (line 535+550)	(565)	
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	
Total Expenses (Excluding Depreciation)		
7. Operating Taxes		
a. Acct 7200	(650)	

Company Name: <u>S&T Telephone Cooperative Association</u>	
DATA YEAR: 2024	
<p>Test for use of FUSF & KUSF</p> <p>CAPITAL:</p> <p>1. Category 1 C&WF</p> <p>2. Category 4.13 COE and Switching</p> <p>MAINTENANCE:</p> <p>3. CWF - MAINT. EXP.</p> <p>4. COE - MAINT. SW</p> <p>5. COE - MAINT-OP SYSTEM</p> <p>6. COE - MAINT. - TRANS.</p> <p>7. CWF - NETWORK SUPPORT</p> <p>8. COE - NETWORK SUPPORT</p> <p>9. CWF GENERAL SUPPORT</p> <p>10. COE GENERAL SUPPORT</p> <p>20. CWF NETWORK OPERATION</p> <p>21. COE NETWORK OPERATION</p> <p>22. CWF EXEC. & PLANNING</p> <p>23. COE EXEC. & PLANNING</p> <p>24. CWF GENERAL ADMIN.</p> <p>25. COE GENERAL ADMIN.</p> <p>26. CWF OPERATING TAXES</p> <p>27. COE OPERATING TAXES</p> <p>28. CWF BENEFITS - TTL OPER EXP</p> <p>29. COE BENEFITS - TTL OPER EXP</p> <p>30. CWF RENTS - TTL OPER EXP</p> <p>31. COE RENTS - TTL OPER EXP</p>	

Company Name: <u>S&T Telephone Cooperative Association</u>	
DATA YEAR: <u>2024</u>	
<p>A. Total Cash Expenditures Associated with USF</p> <p><u>B. Certified Federal USF Receipts:</u></p> <p>B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)</p> <p>B2. Safety Valve Support for acquired Exch. (SVS)</p> <p>B3. Alternative Connect America Model (ACAM/ACAM II)</p> <p>B4. Enhanced Alternative Connect America Cost Model (Enhanced ACAM)</p> <p>B5. Connect America Fund, Phase I, II (CAF I/CAF II)</p> <p>B6. Rural Digital Opportunity Fund, Phase I (RDOF I)</p> <p>B7. Rural Broadband Experiment (RBE)</p> <p>B8. Total Federal USF Receipts</p> <p>C. Gross KUSF Receipts (do not deduct KUSF assessments paid)</p> <p>D. Total FUSF and KUSF Receipts</p> <p>E. Do Expenditures Exceed FUSF Receipts? Yes</p> <p>Amount Expenditures Exceed Certified FUSF (negative number means FUSF exceeds Expenditures)</p> <p>F. Do Expenditures Exceed FUSF & KUSF Receipts? Yes</p> <p>Amount Expenditures Exceed Certified FUSF & KUSF (negative number means FUSF & KUSF exceeds Expenditures)</p> <p>Please provide the following information:</p>	
<div style="text-align: right;"> Contact: <u>Stacey Brigham</u> Title: <u>Regulatory Director</u> Phone No.: <u>719-266-4334</u> E-Mail: <u>sbrigham@tcatel.com</u> </div>	

Narrative Report for New Investments

ETC Certification for Use of **USF** Support
 Provided to the Kansas Corporation Commission

Company Name: S&T Telephone Cooperative Association

Data Year: 2024

					Amount Used in the USF Supported Areas
Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	
A	B	C	D	E	F= C x D
Various					
Various					
Subtotal					
Total					

NOTES:

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255). For CETCs, this amount should match the

Contact: Stacey Brigham
 Title: Regulatory Director

Phone No.: 719-2664334
 E-Mail: sbrigham@tcatel.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)?

(No) . 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
N/A					

(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.

0

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

0.000777604

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 CEO of the S&T Telephone Cooperative Association. 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 S&T Telephone Cooperative Association to the statements made in this certification.

2. By this affidavit, I certify that S&T Telephone Cooperative Association 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 17/06/2025 (date).

Zack Odell

Zack Odell (Jun 17, 2025 14:40 CDT)

Signature

Zack Odell

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 CEO of the S&T Telephone Cooperative Association. 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 S&T Telephone Cooperative Association to the statements made in this certification.

2. By this affidavit, I certify that S&T Telephone Cooperative Association 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 17/06/2025 (date).

Zack Odell

Zack Odell (Jun 17, 2025 14:40 CDT)

Signature

Zack Odell

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
S&T Website	Internet	Worldwide	24/7/365
KGCR - FM	Radio	Northwest Kansas	Varies
KRDQ	Radio	Northwest Kansas	Varies
KWGB - FM	Radio	Northwest Kansas	Varies
KXXX / KQLS	Radio	Northwest Kansas	Varies
KLOE - AM	Radio	Northwest Kansas	Varies
S&T Media	CATV	Service Areas	Varies
Various	Newspapers	Northwest Kansas	Varies
Facebook; Instagram; LinkedIn	Social	Worldwide	Varies
KSKL Scott City	Radio	Northwest/Southwest Kansas	Varies

S&T Annual Phone Directory	Print	Brewster, Colby, Dighton, Goodland, Grinnell, Kanorado, Levant, Menlo, Russell Springs, Winona, Atwood, Bird City, Gove, Grainfield, Hoxie, Leoti, McDonald, Oakley, Sequin, Sharon Springs, Tribune, Wallace, Weskan Customers & all Business Customers. For Residential we targeted age 45+.	November 2024
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(If necessary, please attach additional pages.)

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 for ILEC

COMPARABLE LOCAL USAGE PLAN 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 offers a local usage plan comparable to that of the incumbent. I am binding _____(Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/ Cooperative) 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 _____(date).

Signature

Printed/Typed Name