

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of an Investigation to Determine)	
the Assessment Rate for the Twenty-Second Year of)	Docket No. 18-GIMT-084-GIT
the Kansas Universal Service Fund, Effective)	
March 1, 2018.)	

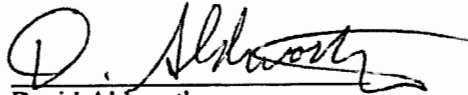
**TELIAX, INC. APPLICATION FOR APPROVAL
OF INTRASTATE ALLOCATION METHODOLOGY**

1. Teliix, Inc. ("Teliix") respectfully requests that the State Corporation Commission ("Commission") approve its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund ("KUSF") for its interconnected VoIP services.
2. In support hereof, Teliix files the accompanying affidavit of David Aldworth, President.
3. Teliix has opted to utilize a traffic study rather than the FCC safe harbor to allocate its interconnected VoIP revenues between the intrastate and interstate/international jurisdictions. As explained in more detail in Mr. Aldworth's affidavit, Teliix's traffic study relies upon actual minutes of use ("MOU") data for both Federal Universal Service Fund ("FUSF") and KUSF purposes, using the inverse of the federal percentage derived from the study to determine the appropriate percentage for KUSF reporting and remittance purposes.
4. Because the traffic report contains proprietary and confidential trade secret actual MOU data, the factors developed using it are being filed under seal.

WHEREFORE, Teliix, Inc. respectfully requests that the Commission approve Teliix's company-specific traffic study and its use of the inverse of the federal percentage derived therefrom for KUSF reporting purposes.

Dated: July 9, 2018

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "D. Aldworth", written over a horizontal line.

David Aldworth
President

VERIFICATION

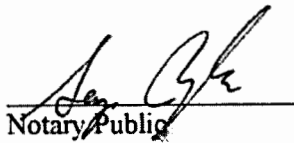
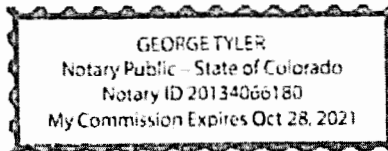
I, David Aldworth, being of lawful age and duly sworn, state that I have read the above and foregoing Application and verify that the statements contained therein are true and correct to the best of my knowledge and belief.



David Aldworth
President

State: Colorado County: Denver

Subscribed and sworn to before me this 9 day of July, 2018.


Notary Public

My Commission Expires: 10/28/2021

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Teliix, Inc. Application for Approval of Intrastate Allocation Methodology was served via electronic mail this 10th day of July, 2018, to the parties appearing on the Commission's service list as last modified on July 5, 2018.

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Inteserra Consulting Group

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of an Investigation to Determine)	
the Assessment Rate for the Twenty-Second Year of)	Docket No. 18-GIMT-084-GIT
the Kansas Universal Service Fund, Effective)	
March 1, 2018.)	
State of Colorado)	
County of Denver)	


**AFFIDAVIT OF DAVID ALDWORTH
ON BEHALF OF TELIAX, INC.**

I, David Aldworth, being of lawful age and duly sworn, state as follows:

1. I am employed by Teliix, Inc. ("Teliix") as President. In this capacity, I have overall responsibility for reporting remittances relating to the Kansas Universal Service Fund ("KUSF") for Teliix.
2. Teliix's methodology for allocating its interconnected VoIP revenues for KUSF purposes is based on a company-specific traffic study, which is used for both Federal Universal Service Fund ("FUSF") and KUSF purposes. The traffic report is based on actual call origination and termination minutes of use ("MOU") data obtained from Teliix's call detail records, which MOU are classified as interstate, intrastate or international. Teliix derives the percentage of interstate/international MOU by dividing the number of interstate and international MOU into total MOU. This percentage is accepted by the Federal Communications Commission for FUSF reporting purposes.
3. Teliix uses the inverse of the federal percentage derived therewith to calculate the percentage for KUSF reporting purposes ($100\% - \text{FUSF \%} = \text{KUSF \%}$). This approach provides a fair and balanced symmetry between federal and state USF programs, and complies with the Commission's directive that carriers use the same allocation methodology for FUSF and KUSF purposes.
4. Teliix applies the KUSF percentage to its Kansas retail interconnected VoIP service revenues to determine the amount it remits to the KUSF.

5. The intrastate factors that will be used by Teliix for KUSF purposes for the KUSF reporting period Q2 (April 2018 – June 2018) are set forth on the confidential and proprietary attachment to my affidavit which is being filed under seal. The study reflects the Kansas traffic that was generated in the first quarter of 2018.

Pursuant to Kan. Stat. Ann. 53-601, I certify that the foregoing is true and correct to the best of my knowledge.

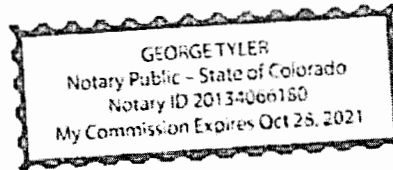

David Aldworth

State Colorado County: Denver

Subscribed and sworn to before me on this 9 day of July, 2018.


Notary Public

My Commission Expires: *10/28/2021*



Teliax

Attachment - Traffic Study Allocation Factors

Traffic for Q2 2018	Minutes	Percentage
Interstate	***	***
Intrastate	***	***
Total	***	***

*****Confidential and Proprietary Information REDACTED*****



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July 10, 2018
Via Overnight Delivery

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

RE: Teliix, Inc.
Application for Approval of Intrastate Allocation Methodology
Docket No. 18-GIMT-084-GIT

Dear Ms. Amy Green:

Enclosed for filing please find the original and two (2) copies of the above referenced filing submitted on behalf of Teliix, Inc. ("Company").

The intrastate factors to be used by the Company, as set forth in the Attachment to this filing, are being submitted under Seal as Confidential. Please handle in accordance with your established procedures for confidential material.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Carey Roesel", written over a horizontal line.

Carey Roesel
Consultant

cc: David Aldworth – Teliix
Service List – via Email
tms: KSx1801

Enclosures
CR/gs