

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

In the Matter of the Audit of 8 x 8 Inc. by the)
Kansas Universal Service Fund (KUSF)) Docket No. 24-88IV-112-KSF
Administrator Pursuant to K.S.A. 66-2010(b) for)
KUSF Operating Year 26, Fiscal Year March)
2022-February 2023.

8X8, INC. COMPLIANCE SUBMISSION

COMES NOW 8x8, Inc. ("8x8") respectfully to submit in this docket the pleadings and associated traffic studies it submitted in the general universal service fund dockets for Fiscal Years 26 through 28.

1. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction. Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

2. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. 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*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel.

May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

3. On July 8, 2024, 8x8 filed the required pleadings in the general Kansas Universal Service Fund dockets for Fiscal Years 25 through 28.

4. To ensure the fullness of the record in this audit docket and for the avoidance of any doubt regarding its compliance, 8x8 hereby files the same pleadings into this docket.

WHEREFORE 8x8 respectfully requests that the Commission accept the pleadings and associated traffic studies in compliance with its order in the above-captioned docket dated May 30, 2024.

Date: July 9, 2024

Respectfully submitted,

DocuSigned by:

Brendan Kasper

C0533E920C6D43D...

Brendan Kasper

Associate General Counsel, Regulatory and
Data Protection Officer

8x8, Inc.

675 Creekside Way

Campbell, CA 95008

(646) 751-7323

VERIFICATION

I, Brendan Kasper, am the Associate General Counsel, Regulatory and Data Protection Officer for 8x8, Inc. I have reviewed the foregoing, and I verify under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2024.

DocuSigned by:
Brendan Kasper
C0533E920C6D43D...

Brendan Kasper
Associate General Counsel, Regulatory and
Data Protection Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008
(646) 751-7323

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Compliance Submission was served via electronic mail this 9th day of July, 2024, to the parties below.

Allison Vuono

Allison Vuono
Senior Legal Analyst
HWG LLP
1919 M Street NW, 8th Floor
Washington, DC 20036

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Brett.Berry@ks.gov

DAWN CARTELLONE, ADMINISTRATIVE ASSISTANT
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
dawn.cartellone@vantagepnt.com

WENDY HARPER, USF SERVICES MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
wendy.harper@vantagepnt.com

SHOMARI JACKSON
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
shomari.jackson@vantagepnt.com

DENNIS SMITH
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE STE B
SPRINGFIELD, IL 62704
dennis.smith@vantagepnt.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
nicole.stephens@vantagepnt.com

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

In the Matter of an Investigation to Determine the)	
Affordable Local Service Rates for)	
Rate-of-Return Regulated Carriers and the)	Docket No. 21-GIMT-095-GIT
Annual Assessment Rate for the Twenty-Fifth)	
Year of the Kansas Universal Service Fund,)	
Effective March 1, 2021)	

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY
FOR UNIVERSAL SERVICE FUND REPORTING**

COMES NOW 8x8, Inc. ("8x8") respectfully to request that the Commission permit its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund ("KUSF").

1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012*, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9 (rel. Jan. 24, 2012).

2. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8, which the Commission had requested. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction.

Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

3. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. 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*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel. May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY25. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2021, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:

Brendan Kasper

C0533E920C6D43D

Brendan Kasper
Associate General Counsel, Regulatory and
Data Protection Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008
(646) 751-7323

VERIFICATION

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024.

Suzanne Seandel

Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached
Acknowledgment

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8th day of July, 2024, to the parties below.



Spencer Kelly
Senior Legal Analyst
HWG LLP
1919 M Street NW, 8th Floor
Washington, DC 20036

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
J.ASTRAB@CURB.KANSAS.GOV

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
T.LOVE@CURB.KANSAS.GOV

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
S.RABB@CURB.KANSAS.GOV

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.SMITH@CURB.KANSAS.GOV

MARK DOTY, ATTORNEY
GLEASON & DOTY CHTD
401 S MAIN, SUITE 102
OTTAWA, KS 66067
DOTY.MARK@GMAIL.COM

COLLEEN JAMISON
JAMISON LAW, LLC
P O BOX 128
TECUMSEH, KS 66542
COLLEEN.JAMISON@JAMISONLAW.LEGAL

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
BRIAN.FEDOTIN@KS.GOV

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
AHSAN.LATIF@KS.GOV

MARK E. CAPLINGER
MARK E. CAPLINGER, P.A.
7936 SW INDIAN WOODS PL
TOPEKA, KS 66615-1421
MARK@CAPLINGERLAW.NET

PAUL H. GARDNER D/B/A ATTORNEY AT LAW
801 NW VESPER
BLUE SPRINGS, MO 64015-3733
LKGARDNER@HOTMAIL.COM

LISA A. GILBREATH
PIERCE ATWOOD LLP
254 COMMERCIAL STREET
PORTLAND, ME 04101
LGILBREATH@PIERCEATWOOD.COM

DENNIS SMITH
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE STE B
SPRINGFIELD, IL 62704
DENNIS.SMITH@VANTAGEPNT.COM

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
NICOLE.STEPHENS@VANTAGEPNT.COM

In the Matter of an Investigation to Determine the)
Affordable Local Service Rates for)
Rate-of-Return Regulated Carriers and the) Docket No. 21-GIMT-095-GIT
Annual Assessment Rate for the Twenty-Fifth)
Year of the Kansas Universal Service Fund,)
Effective March 1, 2021)

AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.

I, Suzanne Michelle Seandel, state as follows:


1. I am employed by 8x8, Inc. ("8x8") as Chief Accounting Officer. In this capacity I am responsible for, among other things, reporting and payments to the Kansas Universal Service Fund.

2. When reporting revenues to the Universal Service Administrative Company for the federal universal service ("USF") program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY25 revenue reporting (and federal USF reporting for calendar year 2021) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.


Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel,
Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached Acknowledgment

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

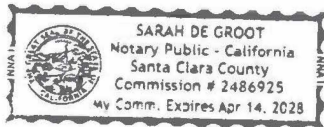
On July 8, 2024 before me, Sarah de Groot, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Seandel
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Sarah de Groot
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT: 8X8, INC. TRAFFIC STUDY

Attachment Redacted in its Entirety

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

In the Matter of an Investigation to Determine the)	
Annual Assessment Rate for the Twenty-Sixth)	Docket No. 22-GIMT-142-GIT
Year of the Kansas Universal Service Fund,)	
Effective March 1, 2022)	

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY
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4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY26. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2022, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:

Brendan Kasper

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Brendan Kasper
Associate General Counsel, Regulatory and
Data Protection Officer
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VERIFICATION

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

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Executed on 7/8/2024.

Suzanne Seandel

Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached
Acknowledgment

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8th day of July, 2024, to the parties below.



Spencer Kelly
Senior Legal Analyst
HWG LLP
1919 M Street NW, 8th Floor
Washington, DC 20036

JOHN IDOUX, GOVERNMENT AFFAIRS DIRECTOR
BRIGHTSPEED BROADBAND LLC D/B/A LUMEN
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
JOHN.IDOUX@BRIGHTSPEED.COM

MARY GARRIS, MANAGER - REGULATORY FINANCE
CENTURYLINK COMMUNICATIONS, LLC D/B/A LUMEN TECHNOLOGIES
GROUP
100 CENTURYLINK DRIVE
MONROE, LA 71203
MARY.GARRIS@LUMEN.COM

KATIE WAGNER, SENIOR CORPORATE COUNSEL
CENTURYLINK COMMUNICATIONS, LLC D/B/A LUMEN TECHNOLOGIES
GROUP
100 CENTURYLINK DRIVE
MONROE, LA 71203
KATIE.WAGNER@LUMEN.COM

RON COMINGDEER, ATTORNEY
COMINGDEER & MURER
5400 N GRAND BLVD
SUITE 102
OKLAHOMA CITY, OK 73112
HUNTER@COMINGDEERLAW.COM

DUSTIN R MURER, ATTORNEY
COMINGDEER & MURER
5400 N GRAND BLVD
SUITE 102
OKLAHOMA CITY, OK 73112
DUSTIN.MURER@COMINGDEERLAW.COM

CONNOR A THOMPSON, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
CTHOMPSON@FOULSTON.COM

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
JZAKOURA@FOULSTON.COM

MARK DOTY
GLEASON & DOTY CHTD
401 S MAIN ST STE 10
PO BOX 490
OTTAWA, KS 66067-0490
DOTY.MARK@GMAIL.COM

COLLEEN JAMISON
JAMISON LAW, LLC
P O BOX 128
TECUMSEH, KS 66542
COLLEEN.JAMISON@JAMISONLAW.LEGAL

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
BRETT.BERRY@KS.GOV

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
BRIAN.FEDOTIN@KS.GOV

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
AHSAN.LATIF@KS.GOV

MARK E. CAPLINGER
MARK E. CAPLINGER, P.A.
7936 SW INDIAN WOODS PL
TOPEKA, KS 66615-1421
MARK@CAPLINGERLAW.NET

LISA A. GILBREATH
PIERCE ATWOOD LLP
254 COMMERCIAL STREET
PORTLAND, ME 04101
LGILBREATH@PIERCEATWOOD.COM

BRUCE NEY, AVP - SENIOR LEGAL COUNSEL, SWB
SOUTHWESTERN BELL TELEPHONE COMPANY, LLC D/B/A AT&T KANSAS
1025 LENOX PARK BLVD
ATLANTA, GA 30319
BRUCE.NEY@ATT.COM

In the Matter of an Investigation to Determine the)
Annual Assessment Rate for the Twenty-Sixth) Docket No. 22-GIMT-142-GIT
Year of the Kansas Universal Service Fund,)
Effective March 1, 2022)

AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.

I, Suzanne Michelle Seandel, state as follows:

1. I am employed by 8x8, Inc. ("8x8") as Chief Accounting Officer. In this capacity I am responsible for, among other things, reporting and payments to the Kansas Universal Service Fund.

2. When reporting revenues to the Universal Service Administrative Company for the federal universal service ("USF") program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY26 revenue reporting (and federal USF reporting for calendar year 2022) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.


Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel,
Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached Acknowledgment

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

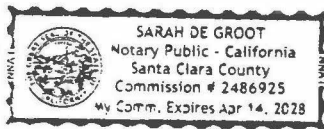
On July 8, 2024 before me, Sarah de Groot, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Scandel
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Sarah de Groot
Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT: 8X8, INC. TRAFFIC STUDY

Attachment Redacted in its Entirety

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

In the Matter of an Investigation to Determine the)	
Affordable Local Service Rates for)	
Rate-of-Return Regulated Carriers and the)	Docket No. 23-GIMT-261-GIT
Annual Assessment Rate for the Twenty-Seventh)	
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Effective March 1, 2023)	

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1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9* (rel. Jan. 24, 2012).

2. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8, which the Commission had requested. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction.

Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

3. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. 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*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel. May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY27. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2023, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:

Brendan Kasper

C0533E920C6D43D...

Brendan Kasper
Associate General Counsel, Regulatory and
Data Protection Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008
(646) 751-7323

VERIFICATION

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024.

Suzanne Seandel

Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See Attached Acknowledgment

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8th day of July, 2024, to the parties below.



Spencer Kelly
Senior Legal Analyst
HWG LLP
1919 M Street NW, 8th Floor
Washington, DC 20036

JOHN IDOUX
BRIGHTSPEED OF KANSAS, LLC
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
JOHN.IDOUX@BRIGHTSPEED.COM

PAMELA SHERWOOD, SENIOR REGULATORY AND COMPLIANCE COUNSEL
BRIGHTSPEED OF KANSAS, LLC
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
PAMELA.SHERWOOD@BRIGHTSPEED.COM

CONNOR A THOMPSON, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
CTHOMPSON@FOULSTON.COM

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
JZAKOURA@FOULSTON.COM

MARK DOTY
GLEASON & DOTY CHTD
401 S MAIN ST STE 10
PO BOX 490
OTTAWA, KS 66067-0490
DOTY.MARK@GMAIL.COM

COLLEEN JAMISON
JAMISON LAW, LLC
P O BOX 128
TECUMSEH, KS 66542
COLLEEN.JAMISON@JAMISONLAW.LEGAL

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
BRIAN.FEDOTIN@KS.GOV

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
AHSAN.LATIF@KS.GOV

PHOENIX Z. ANSHUTZ, ATTORNEY
PENNER LOWE LAW GROUP, LLC
245 N WACO STREET, STE 125
WICHITA, KS 67202
PANSHUTZ@PENNERLOWE.COM

LISA A. GILBREATH
PIERCE ATWOOD LLP
254 COMMERCIAL STREET
PORTLAND, ME 04101
LGILBREATH@PIERCEATWOOD.COM

ANNE E. CALLENBACH, ATTORNEY
POL SINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
ACALLENBACH@POL SINELLI.COM

JARED R. JEVONS, ATTORNEY
POL SINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
JJEVONS@POL SINELLI.COM

BRUCE NEY, AVP - SENIOR LEGAL COUNSEL, SWB
SOUTHWESTERN BELL TELEPHONE COMPANY, LLC D/B/A AT&T KANSAS
1025 LENOX PARK BLVD
ATLANTA, GA 30319
BRUCE.NEY@ATT.COM

In the Matter of an Investigation to Determine the)
Affordable Local Service Rates for)
Rate-of-Return Regulated Carriers and the) Docket No. 23-GIMT-261-GIT
Annual Assessment Rate for the Twenty-Seventh)
Year of the Kansas Universal Service Fund,)
Effective March 1, 2023)

AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.

I, Suzanne Michelle Seandel, state as follows:

1. I am employed by 8x8, Inc. ("8x8") as Chief Accounting Officer. In this capacity I am responsible for, among other things, reporting and payments to the Kansas Universal Service Fund.

2. When reporting revenues to the Universal Service Administrative Company for the federal universal service ("USF") program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY27 revenue reporting (and federal USF reporting for calendar year 2023) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.


Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel,
Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached Acknowledgment

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

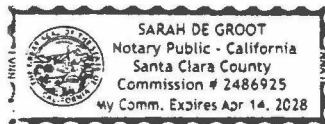
On July 8, 2024 before me, Sarah de Groot, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Seandel
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Sarah de Groot
Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT: 8X8, INC. TRAFFIC STUDY

Attachment Redacted in its Entirety

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

In the Matter of an Investigation to Determine the)	
Annual Assessment Rate for the Twenty-Eighth)	Docket No. 24-GIMT-229-GIT
Year of the Kansas Universal Service Fund,)	
Effective March 1, 2024)	

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY
FOR UNIVERSAL SERVICE FUND REPORTING**

COMES NOW 8x8, Inc. ("8x8") respectfully to request that the Commission permit its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund ("KUSF").

1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012*, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9 (rel. Jan. 24, 2012).

2. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8, which the Commission had requested. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction.

Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

3. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. 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*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel. May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it is using to allocate revenue to the intrastate jurisdiction for FY28. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 is using for federal USF purposes for calendar year 2024, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:

Brendan Kasper

C0533E920C6D43D

Brendan Kasper
Associate General Counsel, Regulatory and
Data Protection Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008
(646) 751-7323

VERIFICATION

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024

Suzanne Seandel
Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

See attached Acknowledgment

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8th day of July, 2024, to the parties below.



Spencer Kelly
Senior Legal Analyst
HWG LLP
1919 M Street NW, 8th Floor
Washington, DC 20036

BRUCE A. NEY, AVP -SENIOR LEGAL COUNSEL
AT&T SERVICES, INC.
816 CONGRESS AVE
SUITE 1100
AUSTIN, TX 78701-2471
BRUCE.NEY@ATT.COM

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
J.ASTRAB@CURB.KANSAS.GOV

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
T.LOVE@CURB.KANSAS.GOV

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD

TOPEKA, KS 66604
S.RABB@CURB.KANSAS.GOV
DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.SMITH@CURB.KANSAS.GOV

CONNOR A THOMPSON, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
CTHOMPSON@FOULSTON.COM

JAMES P ZAKOURA, ATTORNEY
FOULSTON SIEFKIN LLP
7500 COLLEGE BOULEVARD, STE 1400
OVERLAND PARK, KS 66201-4041
JZAKOURA@FOULSTON.COM

MARK DOTY, ATTORNEY
GLEASON & DOTY CHTD
401 S MAIN, SUITE 102
OTTAWA, KS 66067
DOTY.MARK@GMAIL.COM

COLLEEN JAMISON
JAMISON LAW, LLC
P O BOX 128
TECUMSEH, KS 66542
COLLEEN.JAMISON@JAMISONLAW.LEGAL

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
BRETT.BERRY@KS.GOV

In the Matter of an Investigation to Determine the)
Annual Assessment Rate for the Twenty-Eighth) Docket No. 24-GIMT-229-GIT
Year of the Kansas Universal Service Fund,)
Effective March 1, 2024)

AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.

I, Suzanne Michelle Seandel, state as follows:

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3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study that is being used for federal USF reporting for calendar year 2024 is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.


Suzanne Michelle Seandel
Chief Accounting Officer
8x8, Inc.
675 Creekside Way
Campbell, CA 95008

Sworn before me this ____ day of _____, 2024, by Suzanne Michelle Seandel,
Chief Accounting Officer, 8x8, Inc.

Notary Public

Printed Name of Notary: _____

My Commission expires: _____

*See attached
Acknowledgment*

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

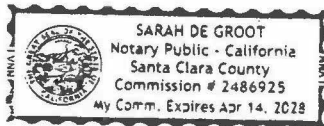
On July 8, 2024 before me, Sarah de Groot, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Seandel
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Sarah de Groot
Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

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☐ Other: _____

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☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian or Conservator

☐ Other: _____

Signer is Representing: _____

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT: 8X8, INC. TRAFFIC STUDY

Attachment Redacted in its Entirety