

**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 Annual ) Docket No. 25-GIMT-141-GIT  
Assessment Rate for the Twenty-Ninth Year of )  
the Kansas Universal Service Fund, Effective )  
March 1, 2025. )

**NOTICE OF ALLOCATION METHODOLOGY**  
**UTILIZED BY USCOC OF NEBRASKA/KANSAS, LLC,**  
**AND KANSAS #15, LP**

COMES NOW USCOC of Nebraska/Kansas, LLC, and Kansas #15, LP, d/b/a U.S. Cellular (“U.S. Cellular”), to notify the State Corporation Commission of the State of Kansas (“Commission”) of the methodology used by U.S. Cellular to allocate revenue to the intrastate jurisdiction for purposes of the Kansas Universal Service Fund (“KUSF”). For its Notice, U.S. Cellular states as follows:

1. Pursuant to K.S.A. 66-2008(a), the Commission requires “every telecommunications carrier, telecommunications public utility and wireless telecommunications service provider that provides intrastate telecommunications service and, to the extent not prohibited by federal law, every provider of interconnected VoIP service, as defined by 47 C.F.R. 9.3 (October 1, 2005), to contribute to the [Kansas Universal Service Fund] on an equitable and nondiscriminatory basis.” On December 27, 1996, in Docket No. 94-GIMT-478-GIT, the Commission stated the contribution would be an annual assessment on each provider’s intrastate retail revenues.
2. In its January 24, 2012 Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing (“Order”) in Docket No. 12-GIMT-168-GIT (“12-168 Docket”), the Commission directed all wireless carriers and

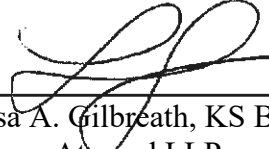
interconnected VoIP providers that use the direct assignment or traffic study methodology to update their factors at least annually.

3. On February 1, 2012, the Commission issued its Amended Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing (“Amended Order”) in the 12-168 Docket. In its Amended Order, among other things, the Commission adopted Staff’s recommendation that wireless and VoIP providers are required to submit a pleading to the Commission if the provider elects to use an allocation methodology other than the Safe Harbor. A pleading must also be filed if a company elects a new methodology. The Commission further adopted Staff’s recommendation that companies provide an affidavit, signed by an officer of the company, verifying that the same methodology and the inverse traffic factors are used for federal Universal Service Fund purposes. Companies are required to provide updates to their methodology and allocations factors at least annually, even if such pleading verifies that no change has occurred. Amended Order at paragraphs 8-9.
4. In accordance with the Commission’s above-referenced orders in the 12-168 Docket, U.S. Cellular files this Notice and attached Confidential Affidavit of Rebecca Murphy Thompson, Vice President of Government Affairs for U.S. Cellular, setting out U.S. Cellular’s methodology for allocating intrastate revenue for KUSF (and inversely, federal USF) purposes during KUSF Year 29.

WHEREFORE, U.S. Cellular respectfully requests that the Commission accept the allocation methodology for KUSF purposes as described in the attached Confidential Affidavit of Rebecca Murphy Thompson.

Respectfully submitted,

Pierce Atwood LLP



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Lisa A. Gilbreath, KS Bar No. 24451

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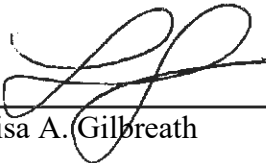
*Attorney for USCOC of Nebraska/Kansas, LLC, and  
Kansas #15, LP, d/b/a U.S. Cellular*

April 1, 2025

**VERIFICATION**  
K.S.A. 53-601

STATE OF MAINE                    )  
  )  
COUNTY OF CUMBERLAND        )            ss:

I, Lisa A. Gilbreath, verify under penalty of perjury under the laws of the state of Kansas that I have caused the foregoing Notice of Allocation Methodology Utilized by USCOC of Nebraska/Kansas, LLC, and Kansas #15, LP, d/b/a U.S. Cellular (“U.S. Cellular”), to be prepared on behalf of U.S. Cellular, and that the contents thereof are true and correct to the best of my knowledge, information and belief. Executed on April 1, 2025.

  
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Lisa A. Gilbreath

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Notice of Allocation Methodology Utilized by USCOC of Nebraska/Kansas, LLC, and Kansas #15, LP, was served via electronic mail this April 1, 2025, to the parties appearing on the Commission's service list (last modified September 18, 2024).

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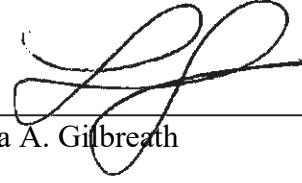
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Lisa A. Gilbreath

**REDACTED CONFIDENTIAL AFFIDAVIT  
OF REBECCA MURPHY THOMPSON**



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**AFFIDAVIT OF REBECCA MURPHY THOMPSON**

I, Rebecca Murphy Thompson, being over the age of 18, depose and state as follows:

1. I am Vice President of Government Affairs for U.S. Cellular LLC. My business address is 8410 W. Bryn Mawr Avenue, Chicago, Illinois, 60631. I am authorized to make this Affidavit on behalf of USCOC of Nebraska/Kansas, LLC, and Kansas #15, LP, d/b/a U.S. Cellular.

2. As stated in the State Corporation Commission of the State of Kansas' ("Commission's") February 1, 2012 Amended Order Setting the Kansas Universal Service Fund Assessment Rate of Year Sixteen and Cancelling Hearing ("Amended Order"), Docket No. 12-GIMT-168-GIT, wireless providers are required to submit a pleading to the Commission if it elects to use an allocation methodology other than the FCC Safe Harbor to calculate Kansas Universal Service Fund ("KUSF") contributions, accompanied by an affidavit signed by an officer or director of the company.

3. Pursuant to the Amended Order, U.S. Cellular hereby advises the Commission that as of January 1, 2025, USCOC of Kansas/Nebraska, LLC, and Kansas #15, LP, are using a [REDACTED] percent intrastate traffic factor to determine the amount taxable for KUSF purposes. The inverse, [REDACTED] percent, is interstate traffic.



**REDACTED CONFIDENTIAL TRAFFIC STUDY**