

**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	)	

DIRECT TESTIMONY

OF

SANDY REAMS

ON

BEHALF OF THE

KANSAS CORPORATION COMMISSION STAFF

December 16, 2021

1   **Q.     Please state your name and business address.**

2   A.     My name is Sandra (Sandy) Reams. My business address is: Kansas Corporation  
3           Commission (Commission), 1500 S.W. Arrowhead Road, Topeka, Kansas 66604.

4   **Q.     What is your position at the Commission?**

5   A.     I am the Assistant Chief of Telecommunications for the Commission's technical staff  
6           (Staff). I became employed by the Commission in December 1996 as a Utility Regulatory  
7           Auditor and, in June 1997, was promoted to Senior Utility Regulatory Auditor. In  
8           February 1998, I changed positions to Telecommunications Auditor and, in April 2002, I  
9           was promoted to Managing Auditor. I was promoted to my current position in October  
10          2011.

11   **Q.     What is your educational background?**

12   A.     I received a Bachelor of Arts in Accounting from Buena Vista University, Storm Lake,  
13           Iowa, and hold Iowa Certified Public Accountant Certificate No. 9487. During my  
14           employment with the Commission, I have attended various regulatory and  
15           telecommunications related courses. I have served as the Chair of the National Association  
16           of Regulatory Utility Commissioners' (NARUC) Staff Subcommittee on State Universal  
17           Service Fund Administrators Subcommittee since August 2010 and have been a member  
18           since 2002. Since 2019, I have served as the State Staff Chair for the Federal-State Joint  
19           Board on Jurisdictional Separations and have been a member of the Board since 2009. I  
20           previously served as the State Staff Chair for the Federal-State Joint Conference on  
21           Accounting Issues and as a member of the Federal-State Joint Oversight Team for the  
22           audits of Southwestern Bell Telephone Company's (SWBT) compliance with Section 272

of the 1996 Federal Telecommunications Act.

**Q. Have you previously testified before the Commission?**

A. Yes. I have provided written and oral testimony to the Commission on numerous issues, including the Kansas Universal Service Fund (KUSF), local service and access rates, inter-LATA dialing parity, cost recovery mechanisms, intrastate revenue requirement cost of service components, and Eligible Telecommunications Carrier (ETC) issues. I have also supported testimony in gas industry proceedings on tax-related issues, shared service agreements, and acquisition premiums.

**Q. Please provide a brief background of this Docket.**

A. On September 28, 2021, the Commission issued its *Order Opening Docket; Protective Order Applicable to CURB; Requiring Entries of Appearance to Actively Participate and Establishing Procedural Schedule* (Opening Order) to determine the KUSF assessment rate for the twenty-sixth Fiscal Year of the KUSF, effective March 1, 2022, through February 28, 2023 (FY 26).

The Commission directed the United Telephone Companies of Kansas d/b/a CenturyLink (CenturyLink)<sup>1</sup> to file its access line data, preliminary annual KUSF support calculations, intrastate access data, and supporting documentation in this Docket on or before October 16, 2021, and provide an electronic version of the data to Staff. Staff was directed to file direct testimony and its calculations supporting its proposed KUSF FY 26 assessment rate by December 17, 2021.

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<sup>1</sup> The United Telephone Companies of Kansas include: Embark Missouri; United Telephone Company of Kansas; United Telephone Company of Eastern Kansas; and United Telephone Company of Southcentral Kansas.

1    **I.      Testimony Summary**

2    **Q.      Please summarize your testimony and recommendations.**

3    A.      My testimony and attached documentation support Staff's recommendation for the  
4           Commission to issue an order to adopt an 11.44% assessment rate for KUSF FY 26.

5    **Q.      Please identify the supporting documentation filed with your testimony.**

6    A.      My written testimony is public, however, Exhibit SKR-1, page 2, Attachment B, and  
7           Attachments G - L contain company-specific data and are deemed confidential, therefore,  
8           I am filing both a redacted and confidential copy of Exhibit SKR-1 and my Attachments  
9           with my testimony. Exhibit SKR-1 summarizes Staff's calculation of the KUSF FY 26  
10          assessment rate and Attachments A – L include documentation to support my calculations.  
11          I note that confidential data is available only to each specific company and the Citizens'  
12          Utility Ratepayer Board (CURB).<sup>2</sup>

13   **Q.      What should a party do if it becomes aware of a Staff computational error?**

14   A.      The Opening Order directs any party that becomes aware of a computational error to notify  
15          Staff as soon as possible to allow Staff time to determine if the error has a material effect  
16          to its calculations and, if necessary, to file revised calculations.<sup>3</sup>

17   **Q.      Is there other information regarding your testimony you wish to explain?**

18   A.      Yes. Rounding differences may exist within my testimony and calculations. Additionally,

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<sup>2</sup> Opening Order, ¶ 13-16. See also *Order: (1) Granting CMT Partners Petition for Reconsideration and/or Clarification to the Extent that the Protective Order Issued in This Docket is Amended; (2) Granting CURB's Petition for Reconsideration and/or Clarification to the Extent that the Commission Clarifies its Intent for CURB to Have Access to Same Information as Staff; and (3) Granting Staff's Motion for Clarification and Clarifies its Intent on the Auditing Procedures and the Future Calculation of the Assessment Rate*, ¶¶12 - 17, Docket No. 94-GIMT-478-GIT (Docket 94-478), Dec. 11, 1998.

<sup>3</sup> Opening Order, Ordering ¶ D.

1 my testimony and calculations recognize the KUSF operates one month in arrears, meaning  
2 revenue earned in a calendar month is reported and the related assessment contributions  
3 are paid to the KUSF the following calendar month. KUSF payments to companies and  
4 programs are disbursed on or before the first of the next calendar month. For example,  
5 carriers were required to report their March 2021 revenues and pay the related assessments  
6 to the KUSF by April 15, 2021. The March 2021 KUSF support disbursements to  
7 companies and programs occurred by May 1, 2021.

8 Additionally, to ensure the accuracy of Staff's calculations, a copy of company-specific  
9 revenue projections were provided to SWBT and CenturyLink. Staff's final KUSF support  
10 calculations were also provided to CenturyLink. Company-specific data was discussed  
11 with the RLECs and/or their consultants, as necessary.

12 **Q. Does Staff believe the actual KUSF operational results will vary from the projections**  
13 **presented in Staff's testimony and calculations?**

14 A. Yes. My testimony relies on the information available at this time, therefore, Staff  
15 expects the actual KUSF operational results to vary from its projections.

16 **II. KUSF FY 26 ASSESSMENT RATE**

17 **Q. Please summarize the components of the KUSF assessment rate.**

18 A. The KUSF assessment rate is comprised of two budgeted components: (1) the projected  
19 KUSF Obligations or amounts to be paid from the KUSF; and (2) the projected Revenue  
20 Base, or the revenue carriers are projected to report to the KUSF for funding purposes.  
21 As shown in Exhibit SKR-1, page 1, the KUSF FY 26 total KUSF Obligations of \$40.4

million are reduced by the projected \$3.8 million Reserve<sup>4</sup> and increased \$2.8 million for the Contingency Fund Allowance,<sup>5</sup> resulting in the \$39.4 million net KUSF Obligations to be collected from a Revenue Base of \$344.0 million, resulting in a proposed 11.44% assessment rate for KUSF FY 26. The comparison of the KUSF FY 26 to the current KUSF FY 25 (March 2021 through February 2022) data is summarized in Table 1:

**Table 1 (In Millions)**

Description	FY 26	FY 25	Impact on KUSF
Gross KUSF Obligations	\$ 40.4	\$ 40.5	\$ (0.1)
Less: Reserve	3.8	2.5	(1.3)
Plus: Contingency Allowance	2.8	2.9	(0.1)
Net KUSF Obligations	\$ 39.4	\$ 40.9	\$ (1.5)
Revenue Base	\$ 344.0	\$ 377.2	\$ (33.2)
Percentage Assessment Rate	11.44%	10.84%	.60%

### **III. KUSF OBLIGATIONS**

**Q. Exhibit SKR-1, page 1, shows \$30 million of KUSF support for the RLECs. Please explain how this amount was calculated.**

A. The calculations related to the RLECs' KUSF support are included in Attachment A. The calculations, which begin with each RLEC's annual KUSF support as of December 1, 2021, indicates the RLECs' current KUSF FY 25 support exceeds the \$30 million cap by \$4,283. The Commission approved access rate, revenue, and KUSF support adjustments in Docket No. 21-GIMT-021-GIT,<sup>6</sup> with the adjustments effective July 1, 2021, and reflected in the December 2021 KUSF support. The RLECs did not recover any access revenue in March through June 2021, giving rise to the \$4,283 difference.

<sup>4</sup> K.S.A. 66-2008(a) and *Order No. 5 Establishing Carrier Assessment Rate for Year 2000 KUSF Contributions*, ¶ 26, Docket No. 00-GIMT-236-GIT, Jan. 19, 2000 (00-236 Jan. 2000 Order).

<sup>5</sup> *Id.*, ¶ 28.

<sup>6</sup> *Order Adopting Revised Intrastate Access Rates, Revenues and KUSF Adjustments; Penalties for MoKan and South Central*, Docket No. 21-GIMT-021-GIT, Oct. 8, 2020.

1 Next, consistent with K.S.A. 66-2008(e)(3), Staff needed to determine the amount of KUSF  
2 support each RLEC would receive absent the \$30 million cap and, therefore, needed to add  
3 each company's KUSF FY 25 pro-rata support reduction to the December 1, 2021 support  
4 amount. Lastly, Staff recognized that Rainbow Telecommunications Association, Inc.  
5 (Rainbow) will fully recover its audit expense as of December 31, 2022, thereby reducing  
6 the Company's KUSF support \$17,075 annually, or \$1,423 per month, for January and  
7 February 2023.<sup>7</sup> In total, the RLECs' unadjusted KUSF FY 26 support is \$31,487,518,  
8 exceeding the \$30 million cap. Thus, Staff recognized \$30 million of KUSF support for  
9 the RLECs.

10 **Q. After determining the RLECs' total KUSF FY 26 support, did Staff calculate the**  
11 **KUSF FY 26 pro-rata support reductions and resulting annual KUSF support?**

12 A. Yes. Staff's pro-rata KUSF support reduction and each RLEC's resulting annual KUSF  
13 support are included as Attachment A, page 2. These calculations will change based on  
14 the results of Craw-Kan Telephone Cooperative, Inc.'s (Craw-Kan) pending application  
15 seeking an additional \$5,455,217 of annual KUSF support.<sup>8</sup> Staff's testimony in that  
16 Docket, filed December 15, 2021, supports an increase of \$2.1 million to Craw-Kan's  
17 annual KUSF support,<sup>9</sup> however, the Company is scheduled to file rebuttal testimony on  
18 December 30, 2021; settlement discussions and an evidentiary hearing are scheduled in  
19 January 2022, briefs are due in February 2022, and a Commission order is due on or before

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<sup>7</sup> *Order Approving Joint Motion to Approve Staff's Position Regarding Rainbow's Annual Cost-Based KUSF Support*, Docket No. 17-RNBT-555-KSF, Jan. 4, 2018.

<sup>8</sup> Application and Request of Craw-Kan Telephone Cooperative, Inc. for an Increase in its Cost-Based Kansas Universal Service Fund Support, Direct Testimony of Stacey Brigham, p. 3, ln. 7-9, Docket No. 22-CRKT-087-KSF (Docket 22-087), Aug. 12, 2021.

<sup>9</sup> Direct Testimony of Katie L. Figgs, p. 6, Docket 22-087, Dec. 15, 2021.

1 April 11, 2022.<sup>10</sup> After the Commission issues an order in the Docket, Staff will submit a  
2 Report and Recommendation and revised KUSF pro-rata support calculations in this  
3 Docket.

4 **Q. Are there other issues that may impact Staff's pro-rata support calculations?**

5 A. Yes. A case is pending in Shawnee County District Court to address the appeal of the  
6 Commission's Orders implementing the \$30 million cap and the KUSF pro-rata support  
7 reductions required by K.S.A. 66-2008(e)(3).<sup>11</sup> The RLECs filed their brief on September  
8 10, 2021, the Commission filed its brief on October 12, 2021, and the RLECs filed their  
9 reply brief on October 25, 2021. It is Staff's understanding that the Court could schedule  
10 oral arguments or decide the case on the written record and that there is no set schedule for  
11 when the Court may take action. When the Court makes a decision, Staff will perform any  
12 necessary KUSF assessment rate and support calculations and submit a Report and  
13 Recommendation in this Docket to advise the Commission of any necessary change.

14 **Q. Please explain how Staff calculated CenturyLink's \$9.0 million of annual KUSF**  
15 **support.**

16 A. The calculation of CenturyLink's annual KUSF support is governed by K.S.A. 66-2008(c)  
17 and capped at \$11.4 million.<sup>12</sup> K.S.A. 66-2008(c)(3) requires that CenturyLink's annual  
18 KUSF support be calculated based on the Commission-adopted high-cost KUSF support  
19 model,<sup>13</sup> with the model-determined support reduced by the annual Connect America Fund

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<sup>10</sup> *Order Designating Presiding Officer; Establishing Procedural Schedule; Protective/Discovery Order*, ¶ 5, Docket 22-087, Sept. 16, 2021.

<sup>11</sup> *Blue Valley Tele-Communications, Inc., et al. v. Kansas Corporation Commission*, Case No. 2021-CV-329.

<sup>12</sup> CenturyLink received \$13,279,541 in KUSF support for the Fiscal Year ended February 2013. The 90% limit results in a total of \$11,951,587, exceeding the \$11.4 million.

<sup>13</sup> *Order No. 10: Order Adopting a Forward Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC's Proxy Cost Model*, Sept. 30, 1999; *Order No. 16: Order Determining the Kansas-Specific*



II (CAF II) support CenturyLink receives “for the same household, if feasible, or for the same census block.”<sup>14</sup> After netting the model-based KUSF support with the CAF II support, CenturyLink recovers from the KUSF, on a revenue-neutral basis, the reduction in its intrastate access revenue that resulted by reducing its intrastate access rates to interstate levels.<sup>15</sup>

**Q. Please summarize how the cost model works.**

A. The cost model includes 112 wire centers that are disaggregated into two zones.<sup>16</sup> Zone 1 is essentially areas located within city boundaries and Zone 2 generally lies outside city boundaries. As shown in Attachment B, monthly KUSF support is dependent upon the wire center and zone in which a line is located, with support ranging from \$0.15 to \$243.23 per line per month.

**Q. How is CenturyLink’s KUSF support determined via the cost-model?**

A. CenturyLink enters its KUSF support-eligible lines in service, as of September 30, 2021, into the cost model for each wire center and zone and submits the data in the Docket. Staff reviews the data for accuracy, including ensuring the lines input in the cost model match the Company’s supporting documentation. For KUSF FY 26, CenturyLink qualifies to

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*Inputs to the FCC Cost Proxy Model to Establish a Cost-Based Kansas Universal Service Fund*, Dec. 29, 1999, Docket No. 99-GIMT-326-GIT.

<sup>14</sup> *Order Adopting Staff’s Report and Recommendation*, ¶11, ordering clause A, Docket 16-511, Oct. 11, 2016, in which the Commission adopted a CAF II support model and true-up process for CAF II and KUSF support. Staff was required to map CenturyLink’s reported locations to which the Company deployed and enabled broadband service that qualify for both CAF II and KUSF support to verify each line is accounted for in the correct KUSF wire center and zone.

<sup>15</sup> *Order Setting Embarq’s Intrastate Access Rates to Parity and Providing for Rebalancing Through the KUSF*, Docket No. 08-GIMT-1023-GIT, March 10, 2010; and *Order on Second Petition for Reconsideration*, June 4, 2010 (Docket 08-1023 Order and Docket 08-1023 Order on Reconsideration).

<sup>16</sup> *Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions*, Docket 00-236, Feb. 14, 2000.

1 receive \$8.7 million of annual KUSF support for FY 26.

2 Per K.S.A. 66-2008(c)(3), this amount is to be reduced by CenturyLink's CAF II support;  
3 however, CenturyLink will not receive CAF II support after December 2021, eliminating  
4 any CAF II support reduction to the KUSF cost-model based support for FY 26.

5 **Q. How amount of access revenue does CenturyLink qualify to recover?**

6 A. First, Staff reviewed CenturyLink's documentation to supports its intrastate access usage  
7 for the twelve-month period ended September 30, 2021.<sup>17</sup> The annual access usage is then  
8 multiplied by the difference between the interstate and intrastate access rates as of  
9 December 30, 2009.<sup>18</sup> Attachment B, page 5, shows that based on the annual usage through  
10 September 30, 2021, CenturyLink qualifies to recover an estimated \$424,967 from the  
11 KUSF during FY 26.

12 **Q. Please explain why the amount CenturyLink recovers is estimated.**

13 A. CenturyLink's intrastate access revenue recovery for a KUSF FY is estimated based on the  
14 most recent twelve-month usage. For KUSF FY 26, the actual recovery will be based on  
15 the usage for October 1, 2021, through September 30, 2022, which is not known at this  
16 time. Therefore, next year, the actual revenue CenturyLink should recover from the KUSF  
17 during FY 26 will be trued-up to reflect the actual usage.<sup>19</sup>

18 Similarly, CenturyLink received \$500,406 of intrastate access revenue for October 2020  
19 through September 2021, which was based on last year's usage, or as of September 30,

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<sup>17</sup> Confidential CenturyLink Data Submission, Docket 22-142, Oct. 22, 2021.

<sup>18</sup> Docket 08-1023 Order.

<sup>19</sup> Docket 08-1023 Order on Reconsideration.

2020. However, based on the actual usage through September 2021, the Company should have recovered \$424,967, or \$75,439 less than it received. Thus, to true-up that amount, the \$75,439 over-recovery is subtracted from the \$424,967 estimated KUSF FY 26 revenue recovery, resulting in the Company recovering \$349,528 during KUSF FY 26.

**Q. How did Staff determine the \$304,687 to fund the Telecommunications Relay Service (TRS)?**

A. As shown in Attachment C, the TRS consists of two components – the actual relay service provided by Sprint Communications Company, LP (Sprint), now T-Mobile, to provide relay service<sup>20</sup> and the administration of the TRS by Assistive Technologies for Kansans (ATK). For March through October 2021, TRS disbursements to Sprint totaled \$169,884, for a monthly average of \$21,236. Annualizing this amount derives an estimated \$254,827 for Sprint to provide TRS for the current KUSF FY 25. For KUSF FY 26, the TRS contract provides for a 111% per minute rate, therefore, applying the 111% increase to the \$254,827 KUSF FY 25 funding results in \$283,763 for Sprint to provide relay services next year.

For the TRS administration component, Staff recognized \$20,924 per the Commission's contract with ATK to administer the TRS program next year.<sup>21</sup> Adding the two components results in a total budget of \$304,687 for TRS. In prior years, a true-up allowance was included to reflect the timing difference between the KUSF FY of March through February and ATK's contract year of April through March. Staff, ATK, and VPS

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<sup>20</sup> Contract, Section 3.0, "Costing Sheet," available for viewing at:  
[https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS\\_SUPPLIER\\_MENU.KS\\_PROCR\\_CNTRCT.GBL](https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL).

<sup>21</sup> TRS/TAP Contract Section 3.0, "Costing Sheet," available at:  
[https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS\\_SUPPLIER\\_MENU.KS\\_PROCR\\_CNTRCT.GBL](https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL).

determined that the fourth quarter TRS administration expense should be recorded in the applicable KUSF year – in this case, FY 24, instead of as a true-up in FY 25.

**Q. Please explain the calculation of the budget for the Telecommunications Access Program (TAP).**

A. The KUSF FY 26 TAP budget, comprised of two components, is \$270,842. The first component is the TAP administration, which is based on the Commission's contract with ATK. The contract provides \$201,428 for direct administration costs (salaries, benefits, training, etc.), the purchase of certain TAP equipment, and a 10% indirect cost allowance for next year.<sup>22</sup> The second TAP component is consumer equipment purchased from third-party vendors. Total third-party vendor equipment costs for March through October 2021 was \$46,276, or a monthly average of \$5,785. Annualizing the average monthly equipment cost derives a cost budget of \$69,414. Adding the two components together results in the \$270,842 KUSF FY 26 TAP budget. I note that in prior years, a true-up was also reflected in the TAP budget, but similar to the TRS true-up, the fourth quarter administration expense was recorded in KUSF FY 24, with no true-up reflected this year.

**Q. How did Staff calculate the \$239,056 budget for the KLSP?**

A. Attachment D, page 2, shows the total KLSP credits for March through October 2021 were \$159,370, or a monthly average of \$19,921. Dividing the \$19,921 by the \$7.77 per line per month KLSP credit indicates the KLSP provided monthly credits to 2,564 low-income subscribers. By annualizing the \$19,921 average monthly credits, Staff calculated a total of \$239,056 for KLSP funding for KUSF FY 25.

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<sup>22</sup> *Id.* See also Master Contract, Amendment 2, Dec. 30, 2020.

KLSP program participation and funding continue to decrease, therefore, to determine the reasonableness of using the 8-month average as the funding basis, Staff also calculated the average monthly KLSP expense and credits for the six-month period of May through October 2021 (\$18,547 and 2,387, respectively) and the three-month period of August through October 2021 (\$17,933 and 2,308, respectively). Staff annualized each of these, deriving annual KLSP funding of \$222,564 and \$215,198, respectively. Since the 8-month average results in a slightly higher funding level, Staff used the \$239,056 as the total KUSF FY 25 KLSP expense.

Staff then needed to determine if any projected change should be recognized for next year's KLSP funding. Both the KLSP funding and subscribership have trended downward the past three years, as shown in page 1 of Attachment D. Subscribership between the years ended February 2020 and 2021 declined 27.02%, with funding declining from \$411,981 to \$300,645. Between the years ended February 2019 and 2020, KLSP subscribership declined 46.28% and funding declined from \$766,951 to \$411,981. While it is likely KLSP subscribership and funding will continue to decline, Staff needs to ensure adequate funding exists for the KLSP. Staff, therefore, applied a nominal 1% growth to the 8-month average KLSP credits of \$19,921, resulting in \$306,814 of KLSP funding for KUSF FY 26.

**Q. How was the KUSF administration budget determined?**

A. The \$515,624 budget for next year's KUSF administration includes the following expenses, shown in Attachment E:

1. KUSF daily administration expense: The Commission's current KUSF administration contract with Vantage Point Solutions (VPS), formerly GVNW Consulting, Inc., is

being extended for an additional twenty-four months.<sup>23</sup> The annual administration amount is unknown to Staff at this since the contract extension has not been finalized. Staff relied on the current \$209,994 contract administration fee for KUSF FY 25 and the average annual increase of 2.5% to derive an estimated \$215,244 for the KUSF administration. In addition to the daily administrative functions, VPS and outside legal counsel have incurred expense related to the pending TAG Mobile, LLC (TAG) bankruptcy case.<sup>24</sup> Staff anticipates additional expenses will be incurred before the case is finalized, thus, to estimate the amount that may be incurred next year, Staff annualized the total administrative and legal bankruptcy related expense incurred between March and October 2021, resulting in the inclusion of an additional \$4,554 for administrative and legal expense, or total administrative expense of \$219,798.

2. KUSF carrier audit expense: Since the Commission is in the process of extending its contract with VPS, the actual contract amount for carrier audits to be performed during KUSF FY 26 is unknown. Relying on the current year's maximum audit expense of \$256,171 and including a 2.5% annual increase allowance derives an estimated budget of \$262,576 for VPS to perform the 16 carrier audits during KUSF FY 26.<sup>25</sup>
3. KUSF third-party audit expense: The Commission's contract with Clifton Larson Allen, LPP (CLA) to perform the annual KUSF financial audit and an Agreed-Upon-Procedure (AUP) review of the KUSF administrator's internal controls and contractual compliance sets a maximum fee of \$20,150 for the financial audit and \$13,100 for the AUP review.<sup>26</sup> Staff, therefore, included a total of \$33,250 for CLA to perform the financial audit and AUP review.

#### IV. KUSF RESERVE

##### **Q. Please explain how Staff calculated the \$3.8 million Reserve.**

- A. The Reserve or estimated KUSF balance as of February 28, 2022, is an offset to the gross KUSF Obligations.<sup>27</sup> Attachment F, pages 1 and 2, include Staff's calculation of the KUSF Reserve and pages 3 and 4 are the KUSF Performance Reports for April (March) and

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<sup>23</sup> Current KCC/VPS contract, Section 3, "Costing Sheet", is available at: [https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS\\_SUPPLIER\\_MENU.KS\\_PROCR\\_CNTRCT.GBL](https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL).

<sup>24</sup> *In RE TAG Mobile, LLC Debtor*, United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Case No.17-33791 -11SGJ.

<sup>25</sup> KCC/VPS Contract, Section 3, "Costing Sheet."

<sup>26</sup> KCC/CLA Contract, Section 3, "Cost Sheet," available at:

[https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS\\_SUPPLIER\\_MENU.KS\\_PROCR\\_CNTRCT.GBL](https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL). See also Contract Amendment dated Sept. 9, 2020.

<sup>27</sup> 00-236 Jan. 2000 Order.

1 November (October) 2021. The Performance Reports include the beginning and ending  
2 KUSF balances and the year-to-date KUSF operational results. Staff recognizing the actual  
3 KUSF monthly operational results through October 2021 and projected the revenue,  
4 receipts, and disbursements for November 2021 through February 2022 to estimate the  
5 ending FY 25 KUSF balance.

6 Staff collaborated with VPS to project each company's revenue based on the revenue  
7 reported by each company for the months of March through October 2021, as shown in  
8 confidential Attachments G (RLECs, CenturyLink, and SWBT); H (wireless providers); I  
9 (Interconnected VoIP providers); and J ((interexchange (IXC) and other providers)).  
10 Companies that earn \$25,000 or less of annual revenue can elect to report revenue and pay  
11 assessments on an annual or semi-annual basis and have already reported their revenues  
12 and paid their assessments, so no projections are necessary, unless the company is  
13 delinquent. If a semi-annual reporter is delinquent, the projected revenue is an amount  
14 equal to the revenue reported for the first semi-annual period. Companies earning \$25,001  
15 and up to \$50,000 of annual revenue may report revenue and pay assessments on a quarterly  
16 basis and, for these companies, projected revenue for the fourth quarter (December 2021 -  
17 February 2022) is equal to the revenue reported for the third quarter (September -  
18 November 2021). Projected revenue for a delinquent quarterly-reporter is equal to the most  
19 recent quarter's reported revenue.

20 The majority of companies report revenue and pay assessments on a monthly basis and, for  
21 monthly reporters, projections are based on the "lower or average" methodology. This

1 methodology, used for over ten years,<sup>28</sup> recognizes revenue trends reported by a company.  
2 Specifically, monthly revenue projections are derived by: (1) calculating the average  
3 monthly revenue reported for March through October; and (2) comparing the monthly  
4 average to the August, September, and October revenue. When the average monthly  
5 revenue exceeds the revenue reported for two of the three months, the projected monthly  
6 revenue is equal to the average monthly revenue. Alternatively, when the average monthly  
7 revenue is less than the revenue reported for two of the three months, the lowest monthly  
8 reported revenue is used for the projected revenue. For example, a company reported  
9 \$105,000 for August, \$107,500 for September, and \$104,500 for October, or total revenue  
10 of \$850,000 and an average monthly revenue of \$106,250. The August and October  
11 revenue are less than the \$106,250 monthly average revenue, with October's revenue being  
12 the lowest. Thus, October's revenue was recognized as the projected monthly revenue.

13 **Q. What is the basis for the Miscellaneous Revenue recognized in Staff's calculations?**

14 A. Miscellaneous revenue includes prior year adjustments arising from a company submitting  
15 revised revenues or coming into compliance with its KUSF obligations, investment  
16 interest, and KUSF penalties. These revenue categories fluctuate monthly, therefore, Staff  
17 recognized the monthly average for each miscellaneous revenue category. Staff is not  
18 aware of any revenue write-offs that may occur the remainder of this year and did not  
19 include any projection for the write-off category.

20 **Q. How were the November 2021 through February 2022 determined for high-cost**  
21 **support, TRS, TAP, and KLSP disbursements derived?**

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<sup>28</sup> The methodology was first employed in Staff's calculations to determine the KUSF assessment rate effective March 1, 2007; Direct Testimony of Sandra K. Reams, Docket No. 07-GIMT-276-GIT, Dec. 20, 2006.



1 A. Staff recognized the October 2021 high-cost support disbursements as the projected  
2 monthly disbursement since there are not any known changes for the remaining months in  
3 KUSF FY 25. Staff recognized the monthly average expense calculated in Attachment C,  
4 or \$22,311 for TRS and \$13,521 for TAP. I note the averages calculated in Attachment C  
5 are not the same as the 8-month average shown in Attachment F, page 2, since ATK's  
6 administrative expense is paid quarterly instead of monthly. Staff recognized \$19,921 for  
7 the KLSP credits, based on the average monthly credits disbursed for subscribers.

8 **Q. How did Staff determine the audit and KUSF Administration disbursements?**

9 A. For carrier audits, VPS was paid \$189,493 for work performed between January and June  
10 2021, of which \$169,161 was for work performed in March through June 2021. Attachment  
11 E, page 2, identifies the remaining maximum contract amount VPS can earn in KUSF FY  
12 25 for carrier audit work as \$87,011. Thus, Staff recognized this amount to be in February  
13 2022. The third-party audits of the KUSF are completed, so no further expense was  
14 recognized for third-party audits.

15 For the administration expense, Staff recognized the \$17,500 monthly expense per the  
16 Commission's contract with VPS, \$52 of other administration expense, and \$448 for legal  
17 costs related to TAG's bankruptcy case. Lastly, the KUSF incurs monthly banking fees,  
18 therefore, Staff recognized the average monthly fee for each month.

19 **Q. Please explain why the "TAG Mobile Liability," identified on page 1 of Attachment**  
20 **F is excluded from the Reserve calculation.**

21 A. In October 2017, the Commission directed TAG Mobile, LLC (TAG), a Lifeline ETC, to

1        repay \$942,298.98 of KLSP credits to the KUSF.<sup>29</sup> That same month, an involuntary  
2        Chapter 7 bankruptcy was filed against TAG and the Commission filed a claim for the  
3        monies owed to the KUSF. In February 2018, the case was converted to a Chapter 11  
4        proceeding, a bankruptcy trustee (Trustee) was appointed, and the sale of TAG is pending.  
5        It is Staff's understanding that once the sale of TAG is finalized, the amount of monies, if  
6        any, to be paid to the KUSF will be determined. Since the recovery amount is unknown,  
7        Staff excluded the monies owed to the KUSF from the Reserve calculation.

8        **V.        CONTINGENCY ALLOWANCE**

9        **Q.        How was the \$2.8 million Contingency Fund Allowance calculated?**

10      A.        The Commission determined a Contingency Fund Allowance, equal to 7.50% of the year's  
11      adjusted KUSF Obligations, is to be included in the KUSF.<sup>30</sup> Thus, 7.50% of the \$36.6  
12      million adjusted KUSF Obligations results in a \$2.8 million Contingency Fund Allowance.

13      **VI.        INTRASTATE REVENUE BASE**

14      **Q.        How was the KUSF FY 26 Revenue Base of \$344.0 million calculated?**

15      A.        The \$344.0 million Revenue Base consists of the projected revenues carriers will report to  
16      the KUSF during KUSF FY 26 and includes \$95.6 million for the LECs and electing  
17      carriers, \$112.2 million for wireless providers, \$21.0 million for VoIP providers, and  
18      \$115.2 million for IXC/other carriers.

19      As I previously discussed, each carrier's revenues for the remainder of KUSF FY 25 were

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<sup>29</sup> *Order Revoking TAG Mobile's State and Federal ETC Designation*, Docket No. 16-TAGC-323-SHO, Oct. 19, 2017.

<sup>30</sup> 00-236 Jan. 2000 Order, ¶ 26.

1 projected and then Staff analyzed the variances in each carrier's or carrier category's  
2 annual revenues as shown in confidential Attachment K. The telecommunications industry  
3 continues to report less intrastate revenue to the KUSF each year, therefore, Staff needed  
4 to determine the amount of revenue decline to recognize for next year. Staff determined  
5 a revenue adjustment factor for each carrier and/or carrier category based on its revenue  
6 variances. When determining a revenue factor to apply, Staff considered that the KUSF  
7 FY 25 projected revenue is based on the "lower or average" methodology, which  
8 recognizes when a carrier has reported declining revenues.

9 **Q. What did Staff's analyses of the RLECs, CenturyLink, and SWBT's revenues show.**

10 A. Confidential Attachment K shows that these carriers' revenues continue to decline  
11 annually, however, the annual revenue decline has slowed. For the current KUSF FY 25,  
12 revenue reported to the KUSF is projected to be approximately \$5.5 million less than last  
13 year, however, the reported decline was \$12.3 million the prior year. To capture a similar  
14 amount of annual revenue, the percentage factor recognized for a carrier or carrier  
15 category must increase, therefore, when Staff applied a percentage factor, it considered  
16 the resulting annual revenue change that resulted from applying the percentage factor.

17 The RLECs' revenue decline is projected to be less this year than the decline reported  
18 last year, however, this may be partially due to the RLECs raising local service rates to  
19 the affordable rates. The RLECs' annual declines range from 3.68% this year up to  
20 4.87% two years ago, with a current two-year average of 4.15%. Since the RLECs'  
21 downward revenue trends are slowing and the current year's revenues reflect local rate  
22 increases, Staff projected a 4.00% revenue decline for the RLECs for KUSF FY 26.

1 CenturyLink is also expected to report a smaller revenue decline this year, Since the  
2 Company's annual revenue declines range from 13.26% up to 15.83%, with a current two-  
3 year average decline of 13.63%, Staff applied a 13.75% revenue reduction factor for  
4 CenturyLink. SWBT also is on track to report a smaller annual decline in revenue this  
5 year. The Company's annual declines range from 4.24% up to 10.82%, with a 7.53%  
6 current two-year average revenue decline. Since the projected revenue decline for the  
7 current year is significantly less than prior years, to achieve a reasonable annual revenue  
8 amount, Staff applied an 8.50% revenue reduction factor for SWBT.

9 **Q. What are the results of Staff's analysis for the wireless carriers?**

10 A. The wireless industry is projected to report \$29.7 million less in revenue to the KUSF  
11 this year, again a lower revenue decline compared to the \$41.4 million revenue reduction  
12 reported last year and the \$53.6 million reduction two years ago. The wireless industry's  
13 annual revenue variances range from \$11.7 million up to \$12.2 million, or from 17.68%  
14 up to 20.40%, with a current two-year average of 18.73%. Since the reduction in  
15 revenues is declining over the years, Staff applied an 18.75% reduction, resulting in the  
16 wireless industry projected to report \$25.9 million less revenue to the KUSF next year.

17 **Q. Does Staff project the VoIP industry will report less revenue to the KUSF?**

18 A. No. Staff projects the VoIP industry will report an increase of \$601,870, or 2.97%, more  
19 to the KUSF this year. In comparison, the VoIP industry reported \$545,000 less revenue  
20 last year and an increase of \$89,000 the prior year. The VoIP industry's annual revenue  
21 variances have ranged from a .41% increase to a 2.67% decline, with a recent two-year

1 average increase of .17%. Staff applied a nominal growth factor of .50%, or \$104,000 of  
2 additional revenue, for the VoIP industry in KUSF FY 26.

3 **Q. Please explain Staff's analysis for the IXC/Other carrier category.**

4 A. The IXC/other carriers are projected to report \$7.3 million less of revenue to the KUSF  
5 this year, a reduction of 5.63%. In comparison, this group reported \$8.6 million less  
6 revenue last year, for a 6.24% decline, and a \$12.8 million, or 8.46% reduction, two years  
7 ago. The current two-year average revenue decline is 5.94%. Staff applied a 5.75%  
8 revenue reduction factor, for a total reduction of \$7.0 million next year, for the IXC/other  
9 carriers.

10 **Q. How does the use of the revenue adjustment factors impact Staff's calculations?**

11 A. The revenue adjustment factors result in Staff projecting a decrease of 10.71%, or \$41.3  
12 million, in the revenue reported to the KUSF in FY 26.

13 **Q. Did Staff review the reasonableness of its revenue projections?**

14 A. Yes. Confidential Attachment K shows that for the years ended February 2019 and 2020,  
15 total reported revenue declined by 13.6%, or \$77.2 million. For the years ended February  
16 2020 and 2021, reported revenue declined \$62.8 million, or 12.82%. For the years ended  
17 February 2021 and 2022, revenues are projected to decline 8.56%, or \$41.9 million.

18 The KUSF FY 24 of March 2020 through February 2021 is the most recent KUSF year  
19 for which actual reported revenue is available, therefore, Staff compared the projected  
20 revenue to the actual revenue carriers reported for the year, shown in Attachment L. A  
21 \$437.7 million projected KUSF FY 24 Revenue Base was used for the 9.40% assessment  
22 rate, however, \$427.2 million, or \$10.5 million less of actual revenue was reported.

1 Assuming the actual \$427.2 million of reported KUSF FY 24 revenue could have been  
2 used to set the assessment rate, the rate would have been 9.63%, a difference of 0.23%  
3 (.0023).

4 Staff proposed the current 10.84% KUSF FY 25 assessment rate based on a projected  
5 Revenue Base of \$377.2 million. Based on current revenues, Staff projects the KUSF FY  
6 25 Revenue Base will be \$385.3 million, or \$8.1 million more than Staff originally  
7 projected. If the 385.3 million currently projected KUSF FY 25 Revenue Base could have  
8 been used, the KUSF FY 25 assessment rate would be 10.61%, a difference of .23%  
9 (.0023).

10 Staff uses the best information available at the time it files testimony and its analysis  
11 indicate the Revenue Base projections have been fairly accurate since they have resulted  
12 in differences of twenty-three hundredths (0.23%) the past two years. Lastly, instead of  
13 recommending a lower assessment rate for KUSF FY 26, Staff proposes an 11.44%  
14 assessment rate to recognize a continued reduction in the revenues reported to the KUSF.

15 **Q. Does this conclude your Direct Testimony?**

16 **A. Yes.**

STATE OF ~~KANSAS~~ NEW JERSEY )  
 ) ss.  
COUNTY OF ~~SHAWNEE~~  
 MIDDLESEX )

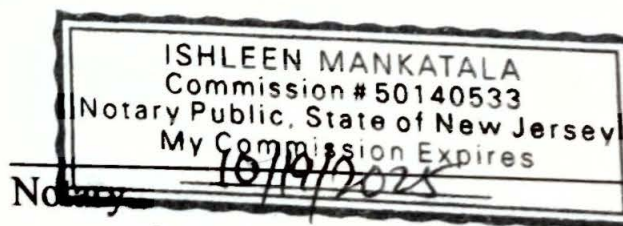
VERIFICATION

Sandy Reams, being duly sworn upon her oath deposes and states that she is an Assistant Chief of Telecommunications for the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that she has read and is familiar with the foregoing *Direct Testimony* and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Sandy Reams

Sandy Reams  
Assistant Chief of Telecommunications  
State Corporation Commission of the  
State of Kansas

Subscribed and sworn to before me this 14<sup>th</sup> day of December, 2021.



My Appointment Expires: 10/19/2025

Ishleen Mankatala  
12/14/2021

STATE OF NEW JERSEY  
COUNTY - MIDDLESEX



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

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

**REDACTED**

EXHIBIT SKR-1

And

ATTACHMENTS A - L

to the DIRECT TESTIMONY

OF

SANDY REAMS

ON

BEHALF OF THE

KANSAS CORPORATION COMMISSION STAFF

December 16, 2021



Line	Description	Explanation	FY 26
	<b><u>KUSF Obligations:</u></b>		<u>(3/1/2022)</u>
1	Rural LECs	Rural LECs' KUSF support (Attachment A).	\$ 30,000,000
2	United-Kansas d/b/a CenturyLink	CenturyLink's KUSF support (high-cost support, CAF II offset, and intrastate access reduction recovery). Subject to True-up (confidential Attachment B).	9,058,052
3	Telecommunications Relay Service (TRS)	TRS budget (Attachment C).	304,687
4	Telecommunications Access Program (TAP)	TAP budget (Attachment C).	270,842
5	Kansas Lifeline Service Program (KLSP)	KLSP budget (Attachment D)	241,446
6	Administration and Audits (GVNW, carrier audits, and third-party audits)	Day-to-day administration, carrier audits, third-party KUSF Financial Audit & Agreed-Upon-Procedures (Attachment E).	<u>515,624</u>
7	<b>Gross KUSF Obligations</b>	The sum of lines 1 through 6	<b>\$ 40,390,651</b>
8	Less: Projected Year 22 Ending Reserve	Estimated Reserve (Attachment F).	<u>3,788,451</u>
9	<b>Adjusted KUSF Obligations</b>	Adjusted KUSF monies to collect prior to Contingency Fund. Sum of Lines 7 and 8	<b>\$ 36,602,200</b>
10	Plus: Contingency Allowance	Equals 7.50% of Adjusted KUSF Obligations (Order, Docket No. 00-GIMT-236-GIT, Jan. 19, 2000)	<u>2,745,165</u>
11	<b>Net KUSF Obligations</b>	Line 9 plus Line 10	<b><u>\$ 39,347,365</u></b>

Line	Description	Explanation	FY 26
	<b>RETAIL REVENUES:</b>		3/1/2021
1	Rural LECs	Rural LEC reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments H & L )	\$ 19,021,506
2	United - KS d/b/a CenturyLink	CenturyLink reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments H & L)	* [REDACTED] *
3	SWBT	SWBT reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments H & L)	* [REDACTED] *
4	Wireless Providers	Wireless providers' reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments I & L)	112,219,068
5	VoIP	VoIP providers' reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments J & L)	20,971,979
6	IXCs/Others	IXC/Other providers' reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments K & L)	115,157,971
7	<b>Total Assessable Revenue Base</b>	<b>Sum of Lines 1-6.</b>	<b>\$ 343,981,708</b>
8	Net KUSF Obligations	(Page 1, line 11)	\$ 39,347,365
9	Total Assessable Revenue Base	(Line 7)	343,981,708
10	<b>Proposed KUSF Assessment Rate</b>	<b>Line 8 / Line 9</b>	<b>11.44%</b>

Line	Company		Annual KUSF	Plus: FY 25	Unadjusted FY	Estimated/Known	Gross Unadjusted	Less: FY 26	Pro-Rated Annual
			Support (12/1/21)	Pro-Rata	26 Annual KUSF	Adjustments	Annual FY 26	Pro-rated	KUSF FY 26
			(A)	(B)	(C = A + B)	(KUSF Support/ Audit Expense)	(E = C + D)	(F)	(G = E - F)
1	Blue Valley	[a]	\$ 1,547,301	\$ 76,614	\$ 1,623,915		\$ 1,623,915	\$ (76,716)	\$ 1,547,199
2	Columbus	[b]	-	-	-		-	-	-
3	Consolidated Communications - KS	[c]	-	-	-		-	-	-
4	Consolidated Communications - MO	[d]	-	-	-		-	-	-
5	Craw-Kan		2,136,009	105,763	2,241,772		2,241,772	(105,905)	2,135,867
6	Cunningham		828,345	41,032	869,377		869,377	(41,071)	828,306
7	Elkhart		822	36	858		858	(41)	817
8	Golden Belt		1,701,192	84,251	1,785,443		1,785,443	(84,347)	1,701,096
9	Gorham		528,635	26,184	554,819		554,819	(26,210)	528,609
10	H & B		658,605	32,623	691,228		691,228	(32,655)	658,573
11	Haviland	[e]	-	-	-		-	-	-
12	Home		533,599	26,429	560,028		560,028	(26,457)	533,571
13	JBN		589,481	29,193	618,674		618,674	(29,227)	589,447
14	KanOkla		659,247	32,647	691,894		691,894	(32,686)	659,208
15	LaHarpe	[f]	-	-	-		-	-	-
16	Madison		216,358	10,717	227,075		227,075	(10,727)	216,348
17	Mokan	[g]	-	-	-		-	-	-
18	Moundridge	[h]	-	-	-		-	-	-
19	Mutual		209,334	10,367	219,701		219,701	(10,379)	209,322
20	Peoples		466,504	23,108	489,612		489,612	(23,130)	466,482
21	Pioneer		3,420,172	169,422	3,589,594		3,589,594	(169,578)	3,420,016
22	Rainbow	[i]	760,130	37,637	797,767	(2,847)	794,921	(37,553)	757,367
23	Rural		2,533,545	125,502	2,659,047		2,659,047	(125,617)	2,533,430
24	S & A		332,064	16,448	348,512		348,512	(16,464)	332,048
25	S & T		1,130,902	56,018	1,186,920		1,186,920	(56,072)	1,130,848
26	South Central		220,444	10,913	231,357		231,357	(10,930)	220,427
27	Southern Kansas		1,142,773	56,603	1,199,376		1,199,376	(56,660)	1,142,716
28	Totah		225,337	11,162	236,499		236,499	(11,173)	225,326
29	Tri-County		1,264,609	62,628	1,327,237		1,327,237	(62,701)	1,264,536
30	Tri-County - Council Grove		924,344	45,778	970,122		970,122	(45,830)	924,292
31	Twin Valley		3,342,181	165,558	3,507,739		3,507,739	(165,711)	3,342,028
32	United Telephone Assoc.	[j]	1,537,192	76,143	1,613,335		1,613,335	(76,216)	1,537,119
33	Wamego		1,525,797	75,582	1,601,379		1,601,379	(75,652)	1,525,727
34	Wheat State		585,100	28,967	614,067		614,067	(29,009)	585,058
35	Wilson		699,256	34,638	733,894		733,894	(34,670)	699,224
36	Zenda		285,005	14,118	299,123		299,123	(14,131)	284,992
<b>Total</b>			<b>\$ 30,004,283</b>	<b>\$ 1,486,081</b>	<b>\$ 31,490,364</b>	<b>\$ (2,847)</b>	<b>\$ 31,487,518</b>	<b>\$ (1,487,518)</b>	<b>\$ 30,000,000</b>
<b>Less: Pro-rata Access Recovery</b>			<b>(4,283)</b>						
<b>Total Paid to RLECs</b>			<b>\$ 30,000,000</b>						
Statutory Cap			<b>\$ 30,000,000</b>						
FY 26 KUSF Support			<b>31,487,518</b>						
Remaining Headroom			<b>\$ (1,487,518)</b>						

Notes:

[a] Company's annual KUSF support was increased \$1,002,290 per year, effective July 1, 2020. Includes \$25,910 per year/\$129,550 total, rate case expense amortized over 5 years. [Order Approving Settlement Agreement, Docket No. 20-BLVT-218-KSF, June 25, 2020].

[b] Company's KUSF support was eliminated, effective March 1, 2017 [Order, Docket 17-GIMT-008-GIT, Jan. 19, 2017]

[c] Company does not receive KUSF support [Docket Nos. 05-GIMT-094-GIT/06-FMCT-858-COC]. See also Docket No. 19-FMCT-161-CCN approving name change.

[d] Company does not receive KUSF support [Order, Docket No. 01-SFLT-879-AUD, May 2, 2003]. See also Docket No. 19-SFLT-197-CCN approving name change.

[e] Company does not receive KUSF support [Order, Docket No. 10-HVDT-288-KSF, Sept. 2010].

[f] Company does not receive KUSF support, effective July 1, 2018 [Order, Docket No. 12-LHPT-875-AUD, June 26, 2013].

[g] Company does not receive KUSF support [Order, Docket No. 04-MKNT-364-AUD, Jan. 12, 2004].

[h] Company does not receive support [Order, Docket No. 15-MRGT-097-AUD, April 27, 2015].

[i] Company will recover, in total, \$85,393, or \$17,079 annually, of audit expense, effective Dec. 31, 2022, therefore, the Company's support will decrease this amount. [Order, Docket No. 17-RNBT-555-KSF, Jan. 4, 2018].

[j] Company's annual KUSF support increased \$1,351,000 per year, effective April 1, 2020. Includes \$20,376 per year/\$101,880 total, audit expense amortized over 5 years. [Order Approving Settlement Agreement, Docket No. 20-UTAT-032-KSF, March 17, 2020].

**PRELIMINARY KUSF Support Cap**

Total Annual Support Payable	\$ 31,487,518
Statutory Cap	30,000,000
Annual KUSF Support Adjustment	<b>\$ (1,487,518)</b>

Line	Company		FY 26				
			Unadjusted Annual KUSF 3/1/22	Pro-Rated Percentage / KUSF Support	Pro-Rated Annual KUSF Support	Total KUSF Support Adjustment	Monthly KUSF Support Adjustment
			(A)	(B)	(C = A x B)	(D = C - A)	(E = D / 12)
1	Blue Valley	[a]	\$ 1,623,915	5.16%	\$ 1,547,199	\$ (76,716)	\$ (6,393)
2	Columbus	[b]	\$ -	0.00%	-	-	-
3	Consolidated Communications KS	[c]	\$ -	0.00%	-	-	-
4	Consolidated Communications MO	[d]	\$ -	0.00%	-	-	-
5	Craw-Kan		\$ 2,241,772	7.12%	2,135,867	(105,905)	(8,825)
6	Cunningham		\$ 869,377	2.76%	828,306	(41,071)	(3,423)
7	Elkhart		\$ 858	0.00%	817	(41)	(3)
8	Golden Belt		\$ 1,785,443	5.67%	1,701,096	(84,347)	(7,029)
9	Gorham		\$ 554,819	1.76%	528,609	(26,210)	(2,184)
10	H & B		\$ 691,228	2.20%	658,573	(32,655)	(2,721)
11	Haviland	[e]	\$ -	0.00%	-	-	-
12	Home		\$ 560,028	1.78%	533,571	(26,457)	(2,205)
13	JBN		\$ 618,674	1.96%	589,447	(29,227)	(2,436)
14	KanOkla		\$ 691,894	2.20%	659,208	(32,686)	(2,724)
15	LaHarpe	[f]	\$ -	0.00%	-	-	-
16	Madison		\$ 227,075	0.72%	216,348	(10,727)	(894)
17	Mokan	[g]	\$ -	0.00%	-	-	-
18	Moundridge	[h]	\$ -	0.00%	-	-	-
19	Mutual		\$ 219,701	0.70%	209,322	(10,379)	(865)
20	Peoples		\$ 489,612	1.55%	466,482	(23,130)	(1,928)
21	Pioneer		\$ 3,589,594	11.40%	3,420,016	(169,578)	(14,131)
22	Rainbow	[i]	\$ 794,921	2.52%	757,367	(37,553)	(3,129)
23	Rural		\$ 2,659,047	8.44%	2,533,430	(125,617)	(10,468)
24	S & A		\$ 348,512	1.11%	332,048	(16,464)	(1,372)
25	S & T		\$ 1,186,920	3.77%	1,130,848	(56,072)	(4,673)
26	South Central		\$ 231,357	0.73%	220,427	(10,930)	(911)
27	Southern Kansas		\$ 1,199,376	3.81%	1,142,716	(56,660)	(4,722)
28	Totah		\$ 236,499	0.75%	225,326	(11,173)	(931)
29	Tri-County		\$ 1,327,237	4.22%	1,264,536	(62,701)	(5,225)
30	Tri-County - Council Grove		\$ 970,122	3.08%	924,292	(45,830)	(3,819)
31	Twin Valley		\$ 3,507,739	11.14%	3,342,028	(165,711)	(13,809)
32	United Telephone Assoc.	[j]	\$ 1,613,335	5.12%	1,537,119	(76,216)	(6,351)
33	Wamego		\$ 1,601,379	5.09%	1,525,727	(75,652)	(6,304)
34	Wheat State		\$ 614,067	1.95%	585,058	(29,009)	(2,417)
35	Wilson		\$ 733,894	2.33%	699,224	(34,670)	(2,889)
36	Zenda		\$ 299,123	0.95%	284,992	(14,131)	(1,178)
<b>Total</b>			<b>\$ 31,487,518</b>	<b>100%</b>	<b>\$ 30,000,000</b>	<b>\$ (1,487,518)</b>	<b>\$ (117,567)</b>

Notes:

- [a] Company's annual KUSF support was increased \$1,002,290 per year, effective July 1, 2020. Includes \$25,910 per year/\$129,550 total, rate case expense amortized over 5 years. [Order Approving Settlement Agreement, Docket No. 20-BLVT-218-KSF, June 25, 2020].
- [b] Company's KUSF support was eliminated, effective March 1, 2017 [Order, Docket 17-GIMT-008-GIT, Jan. 19, 2017].
- [c] Company does not receive KUSF support [Docket Nos. 05-GIMT-094-GIT/06-FMCT-858-COC]. See also Docket No. 19-FMCT-161-CCN approving name change.
- [d] Company does not receive KUSF support [Order, Docket No. 01-SFLT-879-AUD, May 2, 2003]. See also Docket No. 19-SFLT-197-CCN approving name change.
- [e] Company does not receive KUSF support [Order, Docket No. 10-HVDT-288-KSF, Sept. 2010].
- [f] Company does not receive KUSF support, effective July 1, 2018 [Order, Docket No. 12-LHPT-875-AUD, June 26, 2013].
- [g] Company does not receive KUSF support [Order, Docket No. 04-MKNT-364-AUD, Jan. 12, 2004].
- [h] Company does not receive support [Order, Docket No. 15-MRGT-097-AUD, April 27, 2015].
- [i] Company will recover, in total, \$85,393, or \$17,079 annually, of audit expense, effective Dec. 31, 2022, therefore, the Company's support will decrease this amount. [Order, Docket No. 17-RNBT-555-KSF, Jan. 4, 2018].
- [j] Company's annual KUSF support increased \$1,351,000 per year, effective April 1, 2020. Includes \$20,376 per year/\$101,880 total, audit expense amortized over 5 years. [Order Approving Settlement Agreement, Docket No. 20-UTAT-032-KSF, March 17, 2020].

RLEC KUSF Support  
by Month  
FY 26

Line	Company	Monthly KUSF Support											Audit Expense Recovery	Cumulative Feb. 2023	
		(03/1/22)	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22		Jan-23	(Pro-Rated)
1	Blue Valley	\$ 128,933	\$ 128,933	\$ 257,866	\$ 386,800	\$ 515,733	\$ 644,666	\$ 773,599	\$ 902,533	\$ 1,031,466	\$ 1,160,399	\$ 1,289,332		\$ 1,418,266	\$ 1,547,199
2	Columbus	-	-	-	-	-	-	-	-	-	-	-		-	-
3	Consolidated Communications KS	-	-	-	-	-	-	-	-	-	-	-		-	-
4	Consolidated Communications MO	-	-	-	-	-	-	-	-	-	-	-		-	-
5	Craw-Kan	177,989	177,989	355,978	533,967	711,956	889,945	1,067,934	1,245,923	1,423,912	1,601,900	1,779,889		1,957,878	2,135,867
6	Cunningham	69,025	69,025	138,051	207,076	276,102	345,127	414,153	483,178	552,204	621,229	690,255		759,280	828,306
7	Elkhart	68	68	136	204	272	341	409	477	545	613	681		749	817
8	Golden Belt	141,758	141,758	283,516	425,274	567,032	708,790	850,548	992,306	1,134,064	1,275,822	1,417,580		1,559,338	1,701,096
9	Gorham	44,051	44,051	88,101	132,152	176,203	220,254	264,304	308,355	352,406	396,456	440,507		484,558	528,609
10	H & B	54,881	54,881	109,762	164,643	219,524	274,406	329,287	384,168	439,049	493,930	548,811		603,692	658,573
11	Haviland	-	-	-	-	-	-	-	-	-	-	-		-	-
12	Home	44,464	44,464	88,929	133,393	177,857	222,321	266,786	311,250	355,714	400,179	444,643		489,107	533,571
13	JBN	49,121	49,121	98,241	147,362	196,482	245,603	294,723	343,844	392,965	442,085	491,206		540,326	589,447
14	KanOkla	54,934	54,934	109,868	164,802	219,736	274,670	329,604	384,538	439,472	494,406	549,340		604,274	659,208
15	LaHarpe	-	-	-	-	-	-	-	-	-	-	-		-	-
16	Madison	18,029	18,029	36,058	54,087	72,116	90,145	108,174	126,203	144,232	162,261	180,290		198,319	216,348
17	Mokan	-	-	-	-	-	-	-	-	-	-	-		-	-
18	Moundridge	-	-	-	-	-	-	-	-	-	-	-		-	-
19	Mutual	17,443	17,443	34,887	52,330	69,774	87,217	104,661	122,104	139,548	156,991	174,435		191,878	209,322
20	Peoples	38,873	38,873	77,747	116,620	155,494	194,367	233,241	272,114	310,988	349,861	388,735		427,608	466,482
21	Pioneer	285,001	285,001	570,003	855,004	1,140,005	1,425,007	1,710,008	1,995,009	2,280,011	2,565,012	2,850,014		3,135,015	3,420,016
22	Rainbow	63,351	63,351	126,702	190,053	253,405	316,756	380,107	443,458	506,809	570,160	633,511	61,928	695,439	757,367
23	Rural	211,119	211,119	422,238	633,357	844,477	1,055,596	1,266,715	1,477,834	1,688,953	1,900,072	2,111,191		2,322,310	2,533,430
24	S & A	27,671	27,671	55,341	83,012	110,683	138,353	166,024	193,695	221,365	249,036	276,706		304,377	332,048
25	S & T	94,237	94,237	188,475	282,712	376,949	471,187	565,424	659,661	753,899	848,136	942,373		1,036,611	1,130,848
26	South Central	18,369	18,369	36,738	55,107	73,476	91,845	110,214	128,583	146,952	165,321	183,689		202,058	220,427
27	Southern Kansas	95,226	95,226	190,453	285,679	380,905	476,132	571,358	666,584	761,810	857,037	952,263		1,047,489	1,142,716
28	Totah	18,777	18,777	37,554	56,332	75,109	93,886	112,663	131,440	150,218	168,995	187,772		206,549	225,326
29	Tri-County	105,378	105,378	210,756	316,134	421,512	526,890	632,268	737,646	843,024	948,402	1,053,780		1,159,158	1,264,536
30	Tri-County / Council Grove	77,024	77,024	154,049	231,073	308,097	385,122	462,146	539,170	616,195	693,219	770,243		847,268	924,292
31	Twin Valley	278,502	278,502	557,005	835,507	1,114,009	1,392,512	1,671,014	1,949,516	2,228,019	2,506,521	2,785,023		3,063,526	3,342,028
32	United Tel. Assoc.	128,093	128,093	256,186	384,280	512,373	640,466	768,559	896,653	1,024,746	1,152,839	1,280,932		1,409,025	1,537,119
33	Wamego	127,144	127,144	254,288	381,432	508,576	635,720	762,864	890,008	1,017,152	1,144,296	1,271,440		1,398,584	1,525,727
34	Wheat State	48,755	48,755	97,510	146,264	195,019	243,774	292,529	341,284	390,038	438,793	487,548		536,303	585,058
35	Wilson	58,269	58,269	116,537	174,806	233,075	291,343	349,612	407,881	466,149	524,418	582,686		640,955	699,224
36	Zenda	23,749	23,749	47,499	71,248	94,997	118,747	142,496	166,245	189,995	213,744	237,493		261,243	284,992
<b>Total -Cumulative</b>		<b>\$ 2,500,237</b>	<b>\$ 2,500,237</b>	<b>\$ 5,000,474</b>	<b>\$ 7,500,712</b>	<b>\$ 10,000,949</b>	<b>\$ 12,501,186</b>	<b>\$ 15,001,423</b>	<b>\$ 17,501,660</b>	<b>\$ 20,001,897</b>	<b>\$ 22,502,135</b>	<b>\$ 25,002,372</b>		<b>\$ 27,501,186</b>	<b>\$ 30,000,000</b>

**United Telephone Companies of Kansas d/b/a CenturyLink KS00001411**  
**KUSF Support Calculation Worksheet**  
**Effective As Of 3/1/2022 Data Month**  
**Fiscal Year 2022/2023**

<u>Description</u>		<u>Annual</u>	<u>Monthly</u>
<u>United of Eastern/South Central SAC 411317</u>			
Estimated Gross KUSF	\$ 6,722,185		
Less: Estimated CAF II Offset	-		
Net KUSF: United of Eastern/South Central SAC		\$ 6,722,185	\$ 560,182
<u>United of Kansas SAC 411842</u>			
Estimated Gross KUSF	\$ 1,831,736		
Less: Estimated CAF II Offset	-		
Net KUSF: United of Kansas SAC		1,831,736	152,645
<u>Embarq MO SAC 411957</u>			
Estimated Gross KUSF	\$ 131,969		
Less: Estimated CAF II Offset	-		
Net KUSF: United of MO SAC		131,969	10,997
Net Cost-Based KUSF Support Payable to Company		<b>\$ 8,685,890</b>	<b>\$ 723,824</b>
Plus: Access revenue Recovery-Docket No. 08-1023		349,528	29,127
Total Adjusted KUSF Support Payable to Company		<b>\$ 9,035,418</b>	<b>\$ 752,952</b>

Assessment Rate 11.44%

**Lifeline \$ 7.77**

Per HB 2201, KUSF Support Capped at:	Support
KUSF Support, as of 2/28/2013	\$ 13,279,541
	90%
	\$ 11,951,587
Or, Lesser of, or Cap	\$ 11,400,000

Wire Center	As of September 30, 2021				
	ZONE 1			ZONE 2	
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)
Alta Vista		\$ 18.19		\$ 100.01	
Altoona		\$ 21.80		\$ 91.96	
Belle Plaine		\$ -		\$ 31.13	
Benedict		\$ -		\$ 117.03	
Blue Mound		\$ 40.47		\$ 114.80	
Bucyrus		\$ -		\$ 39.07	
Buffalo		\$ -		\$ 70.97	
Centropolis		\$ -		\$ 69.73	
Circleville		\$ 34.46		\$ 90.67	
Conway		\$ -		\$ 98.49	
Coyville		\$ -		\$ 88.71	
Delia		\$ -		\$ 84.53	
Denison		\$ 29.99		\$ 84.00	
Durham		\$ -		\$ 103.19	
Easton		\$ 7.74		\$ 43.71	
Edgerton		\$ -		\$ 21.98	
Effingham		\$ 4.01		\$ 59.56	
Emmett		\$ 39.17		\$ 93.49	
Fall River		\$ -		\$ 68.10	
Fontana		\$ -		\$ 47.58	
Gardner		\$ -		\$ 3.08	
Greeley		\$ 8.04		\$ 66.26	
Gridley		\$ 14.80		\$ 109.86	
Harveyville		\$ 24.75		\$ 82.47	
Hesston		\$ -		\$ 17.30	
Hoyt		\$ 5.81		\$ 45.96	
Inman		\$ -		\$ 42.76	
Lafontaine		\$ -		\$ 125.45	
Lancaster		\$ 4.09		\$ 51.05	
Lane		\$ -		\$ 32.96	
Lebo		\$ 2.99		\$ 77.37	
Lehigh		\$ 41.68		\$ 117.10	
Le Roy		\$ 17.48		\$ 111.73	
Linwood		\$ 8.12		\$ 29.30	
Mapleton		\$ -		\$ 93.54	
Mayetta		\$ 16.87		\$ 51.20	
Mc Louth		\$ 3.77		\$ 50.21	
Meriden		\$ 1.17		\$ 28.18	
Michigan Valley		\$ -		\$ 86.39	
Mound City		\$ 1.71		\$ 53.47	
Neosho Falls		\$ -		\$ 93.55	
Nortonville		\$ 5.83		\$ 57.07	
Osage City		\$ -		\$ 37.89	

Wire Center	As of September 30, 2021					
	ZONE 1			ZONE 2		
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Overbrook		\$ 1.30			\$ 54.24	
Oxford		\$ -			\$ 49.26	
Ozawkie		\$ 7.56			\$ 38.45	
Parker		\$ 12.16			\$ 67.36	
Perry		\$ 0.15			\$ 36.68	
Piqua		\$ -			\$ 117.23	
Princeton		\$ 8.28			\$ 67.05	
Quincy		\$ -			\$ 243.23	
Richmond		\$ 9.84			\$ 69.69	
Rossville		\$ -			\$ 45.52	
Silver Lake		\$ -			\$ 27.20	
Spring Hill		\$ 0.41			\$ 21.46	
Saint Marys		\$ -			\$ 15.95	
Thayer		\$ 11.90			\$ 75.96	
Toronto		\$ 14.09			\$ 80.33	
Walton		\$ 12.47			\$ 70.57	
Wellsville		\$ -			\$ 41.21	
Winchester		\$ 1.11			\$ 60.84	
Windom		\$ -			\$ 60.58	
Abbyville		\$ -			\$ 59.22	
Alden		\$ 27.44			\$ 45.06	
Arlington		\$ 10.55			\$ 71.51	
Belpre		\$ -			\$ 72.04	
Clafin		\$ 6.34			\$ 75.04	
Cunningham		\$ 15.68			\$ 109.55	
Hoisington		\$ -			\$ 49.76	
Hudson		\$ -			\$ 57.73	
Langdon		\$ -			\$ 67.61	
Macksville		\$ -			\$ 43.76	
Murdock		\$ -			\$ 92.68	
Partridge		\$ 13.29			\$ 64.25	
Preston		\$ -			\$ 87.12	
Pretty Prairie		\$ 9.13			\$ 70.83	
Saint John		\$ 0.42			\$ 73.11	
Sterling		\$ -			\$ 33.26	
Sylvia		\$ -			\$ 48.80	
Total			\$ 389,163			\$ 6,333,022
Riverton		\$ 5.38			\$ 36.70	
Scammon		\$ 2.06			\$ 28.18	
Total			\$ 10,061			\$ 121,908
Alma		\$ -			\$ 63.41	



Wire Center	As of September 30, 2021					
	ZONE 1			ZONE 2		
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Altamont		\$ 0.82			\$ 57.60	
Baldwin		\$ -			\$ 20.81	
Buhler		\$ -			\$ 26.31	
Burlingame		\$ -			\$ 27.66	
Burlington		\$ -			\$ 32.11	
Burton		\$ 9.41			\$ 82.62	
Ellinwood		\$ -			\$ 37.54	
Eskridge		\$ -			\$ 95.25	
Fredonia		\$ -			\$ 4.78	
Garnett		\$ -			\$ 21.33	
Haven		\$ -			\$ 9.16	
Highland		\$ -			\$ 21.49	
Hillsboro		\$ -			\$ 13.26	
Kincaid		\$ -			\$ 54.52	
Lyndon		\$ -			\$ 28.81	
Melvern		\$ -			\$ 60.74	
Moran		\$ 7.46			\$ 72.61	
Morrill		\$ -			\$ 36.76	
Mound Valley		\$ 15.01			\$ 78.78	
Oskaloosa		\$ -			\$ 26.07	
Oswego		\$ -			\$ 24.81	
Pomona		\$ -			\$ 28.28	
Powhattan		\$ -			\$ 51.81	
Quenemo		\$ -			\$ 111.32	
Troy		\$ -			\$ 45.65	
Valley Falls		\$ -			\$ 26.42	
Wathena		\$ 2.68			\$ 45.16	
Waverly		\$ 1.12			\$ 84.23	
Westphalia		\$ -			\$ 75.84	
White Cloud		\$ 14.45			\$ 69.22	
Total			\$ 36,198			\$ 1,795,538
Subtotal (Zone)			\$ 435,422			\$ 8,250,468
Total Company				21,028		\$ 8,685,890

KUSF Year 23 (Eff. 3/1/2019)				
Year 22 - 23 Access True-Up				
12-Month Volumes 9/30/2018		\$	575,519	
Monthly Support			47,960	
KUSF Per 9/30/2019 Volumes		\$	467,017	
Monthly Support		\$	38,918	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-18	\$ 79,521	\$ 38,918	\$ (40,603)	
Nov-18	79,521	38,918	(40,603)	
Dec-18	79,521	38,918	(40,603)	
Jan-19	79,521	38,918	(40,603)	
Feb-19	79,521	38,918	(40,603)	
Mar-19	18,188	38,918	20,731	
Apr-19	18,188	38,918	20,731	
May-19	18,188	38,918	20,731	
Jun-19	18,188	38,918	20,731	
Jul-19	18,188	38,918	20,731	
Aug-19	18,188	38,918	20,731	
Sep-19	18,188	38,918	20,731	
Annual Total	\$ 524,916	\$ 467,017	\$ (57,899)	
Mar 19 Estimate		\$	575,519	
Year 22 True-Up			(357,269)	
Adjusted Payable		\$	218,250	
Monthly		\$	18,188	

KUSF Year 24 (Eff. 3/1/2020)				
Year 23 - 24 Access True-Up				
12-Month Volumes 9/30/2019		\$	467,017	
Monthly Support			38,918	
KUSF Per 9/30/2020 Volumes		\$	447,601	
Monthly Support		\$	37,300	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-19	\$ 18,188	\$ 37,300	\$ 19,113	
Nov-19	18,188	37,300	19,113	
Dec-19	18,188	37,300	19,113	
Jan-20	18,188	37,300	19,113	
Feb-20	18,188	37,300	19,113	
Mar-20	34,093	37,300	3,207	
Apr-20	34,093	37,300	3,207	
May-20	34,093	37,300	3,207	
Jun-20	34,093	37,300	3,207	
Jul-20	34,093	37,300	3,207	
Aug-20	34,093	37,300	3,207	
Sep-20	34,093	37,300	3,207	
Annual Total	\$ 329,590	\$ 447,601	\$ 118,011	
Mar 20 Estimate		\$	467,017	
Year 23 True-Up			(57,899)	
Adjusted Payable		\$	409,118	
Monthly		\$	34,093	

KUSF Year 25 (Eff. 3/1/2021)				
Year 24 - 25 Access True-Up				
12-Month Volumes 9/30/2020		\$	447,601	
Monthly Support		\$	37,300	
KUSF Per 9/30/2021 Volumes		\$	424,967	
Monthly Support		\$	35,414	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-20	\$ 34,093	\$ 35,414	\$ 1,321	
Nov-20	34,093	35,414	1,321	
Dec-20	34,093	35,414	1,321	
Jan-21	34,093	35,414	1,321	
Feb-21	34,093	35,414	1,321	
Mar-21	47,134	35,414	(11,720)	
Apr-21	47,134	35,414	(11,720)	
May-21	47,134	35,414	(11,720)	
Jun-21	47,134	35,414	(11,720)	
Jul-21	47,134	35,414	(11,720)	
Aug-21	47,134	35,414	(11,720)	
Sep-21	47,134	35,414	(11,720)	
Annual Total	\$ 500,406	\$ 424,967	\$ (75,439)	
Mar 21 Estimate		\$	447,601	
Year 24 True-Up			118,011	
Adjusted Payable		\$	565,612	
Monthly		\$	47,134	

KUSF Year 26 (Eff. 3/1/2022)				
Year 25 - 26 Access True-Up				
12-Month Volumes 9/30/2021		\$	424,967	
Monthly Support		\$	35,414	
KUSF Per 9/30/2022 Volumes		\$	-	
Monthly Support		\$	-	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-21	\$ 47,134			
Nov-21	47,134			
Dec-21	47,134			
Jan-22	47,134			
Feb-22	47,134			
Mar-22	29,127			
Apr-22	29,127			
May-22	29,127			
Jun-22	29,127			
Jul-22	29,127			
Aug-22	29,127			
Sep-22	29,127			
Annual Total	\$ 439,563	\$ -	\$ -	
Mar 22 Estimate		\$	424,967	
Year 25 True-Up		\$	(75,439)	
Adjusted Payable		\$	349,528	
Monthly		\$	29,127	

KUSF FY 26  
Telecommunications Relay Service and  
Access Program Funding

Activity Month Data Month	Apr-21 Mar-21	May-21 Apr-21	Jun-21 May-21	Jul-21 Jun-21	Aug-21 Jul-21	Sep-21 Aug-21	Oct-21 Sep-21	Nov-21 Oct-21	Total	Monthly Average
<b>Telecommunications Relay Service:</b>										
Sprint Relay Services [a]	\$ 24,327	\$ 20,151	\$ 16,530	\$ 17,888	\$ 25,264	\$ 23,390	\$ 21,861	\$ 20,474	\$ 169,884	\$ 21,236
Telecommunications Relay Service - Admin. [b]	-			\$ 2,499			\$ 3,950		\$ 6,450	\$ 1,075
KUSF FY 24 True-Up	-									-
Total ATK Administration	\$ -	\$ -	\$ -	\$ 2,499	\$ -	\$ -	\$ 3,950	\$ -	\$ 176,334	\$ 22,311
Total Relay	\$ 24,327	\$ 20,151	\$ 16,530	\$ 20,388	\$ 25,264	\$ 23,390	\$ 25,811	\$ 20,474		

<b>Total FY 26 Relay Costs</b>		Per minute rate	
T-Mobile/Sprint Relay Service	\$ 283,763	2021	\$ 2.73
Administration Costs [ Feb. 15, 2019 Contract]	20,924	2022	\$ 3.04
	-	Annual Increase	111%
<b>Total</b>	<b>\$ 304,687</b>	FY 25 Mo. Ave.	\$ 21,236
		FY 25 Annualized	\$ 254,827
		<b>FY 26 Projected</b>	<b>\$ 283,763</b>

Activity Month Data Month	Apr-21 Mar-21	May-21 Apr-21	Jun-21 May-21	Jul-21 Jun-21	Aug-21 Jul-21	Sep-21 Aug-21	Oct-21 Sep-21	Nov-21 Oct-21	Total	Monthly Average
<b>Telecommunications Access Program:</b>										
Assistive Technologies of Kansas - Admin. [b]	\$ -			\$ 20,478			\$ 25,941		\$ 46,419	\$ 7,736
TAP Equipment	14,204	3,516	4,854	6,345	3,876	4,346	5,198	3,936	46,276	\$ 5,785
KUSF FY 24 True-Up	-								-	
<b>Total</b>	\$ 14,204	\$ 3,516	\$ 4,854	\$ 26,823	\$ 3,876	\$ 4,346	\$ 31,139	\$ 3,936	\$ 92,695	\$ 13,521

<b>Contractual Costs/Estimated TAP Equipment</b>		TAP Equipment	
Administration (FY 3/22 - 2/23)	\$ 201,428	FY 25 Mo. Ave.	\$ 5,785
TAP Equipment	69,414	FY 25 Annualized	\$ 69,414
<b>Total</b>	<b>\$ 270,842</b>		

Notes:

[a] Contract is available at: [https://da.ks.gov/purch/contracts/view\\_contract.aspx?ContractID=000000000000000000045640](https://da.ks.gov/purch/contracts/view_contract.aspx?ContractID=000000000000000000045640).

[b] Includes 6 months' administrative costs and equipment purchases by ATK. Contract is available at: [https://da.ks.gov/purch/contracts/view\\_contract.aspx?ContractID=000000000000000000046051](https://da.ks.gov/purch/contracts/view_contract.aspx?ContractID=000000000000000000046051).

Line	Description							
1	8-Month Average KLSP Credits (from line 9)	\$	19,921					
2	Projected Line Growth (Decline)	1.0%						
3	Estimated Line Growth		199					
4	Projected Monthly KLSP Credits - FY 26 ( line 1 + 3)	\$	20,121					
5	<b>FY 26 KLSP Funding [line 4 x 12]</b>	<b>\$</b>	<b>241,446</b>					
<b>Analysis of FY 25 Disbursements</b>								
6	KLSP Credits - March - Oct. 2021 Total	\$	159,370	Comparison of FY 25	Change in	Percent	Funding Change	
7	KLSP Credits - 8 Months' Average	\$	19,921	Annualized 8 Month's	No. Lines	Line Change		
8	Equivalent No. of Lines supported (\$7.77/line)/Month		2,564	Average to FY 24	(661)	-20.49%	\$ (61,589)	
9	Annualized KLSP Credits	\$	239,056		(line 8 - line 20)		(line 9 - line 18)	
10	KLSP Credits - May - Oct. 2021 Total	\$	111,282	Comparison of FY 25				
11	KLSP Credits - 6 Months' Average	\$	18,547	Annualized 6 Month's	(837)	-25.97%	\$ (78,081)	
12	Equivalent No. of Lines supported (\$7.77/line)		2,387	Average to FY 24	(line 12 - line 20)		(line 13 - line 18)	
13	Annualized KLSP Credits	\$	222,564					
14	KLSP Credits - Aug. - Oct. 2021 Total	\$	53,799	Comparison of FY 25				
15	KLSP Credits - 3 Months' Average	\$	17,933	Annualized 3 Month's	(916)	-28.42%	\$ (85,447)	
16	Equivalent No. of Lines supported (\$7.77/line)		2,308	Average to FY 24	(line 16 - line 20)		(line 17 - line 18)	
17	Annualized KLSP Credits	\$	215,198					
<b>Analysis of FY 22 - 24 Growth</b>								
18	KLSP credits as of Feb. 2021 (FY 24) [a]	\$	300,645		Change in	Percent		
19	Average KLSP credits per month		25,054		No. Lines	Line Change	Funding Change	2 Year Average
20	Equivalent No. of Lines supported (\$7.77/line)		3,224		(current lines - prior	(change/prior	(current funding -	Line Change
					year lines )	year lines)	prior funding)	(average of change
				FY 23 - FY 24	(1,194)	-27.02%	\$ (111,336)	in 2 years)
21	KLSP credits as of Feb. 2020 (FY 23) [a]	[a]	411,981	(Line 20 - line 23)				Percent
22	Average KLSP credits per month		34,332					Change
23	Equivalent No. of Lines supported (\$7.77/line)		4,419	FY 22 - FY 23	(3,807)	-46.28%	\$ (354,970)	(average 2
				(Line 23 - line 26)				year percent)
24	KLSP credits as of Feb. 2019 (FY 22) [b]	[b]	766,951					
25	Average KLSP credits per month		63,913					
26	Equivalent No. of Lines supported (\$7.77/line)		8,226					

**Notes:**

- [a] KUSF Financial Statements for the Year Ended Feb. 28, 2021, Note 3, Docket No. 20-GIMT-086-GIT, Aug. 9, 2021.  
[b] KUSF Financial Statements for the Year Ended Feb. 29, 2020, Note 3, Docket No. 19-GIMT-056-GIT, Aug. 31, 2020.  
[c] KUSF Financial Statements for the Year Ended Feb. 28, 2019, Note 3, Docket No. 18-GIMT-084-GIT, Sept. 17, 2019.

Activity Month	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21										
Company Name	Data Month	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Total								
Blue Valley Tele-Communications Inc	\$	209.79	\$	209.79	\$	209.79	\$	209.79	\$	209.79	\$	1,678.32						
Blue Valley Technologies Inc. (fka One Point		54.39		46.62		54.39		46.62		46.62		\$	388.50					
Columbus Communications Services, Inc.		77.70		69.93		77.70		62.16		62.16		\$	543.90					
Tri-County Tel. - Council Grove Study Area		202.02		202.02		209.79		209.79		194.25		\$	1,623.93					
Craw-Kan Telephone Co-op Inc		1,320.90		1,297.59		1,297.59		1,313.13		1,336.44		\$	10,559.43					
Cunningham Telephone Company Inc		155.40		147.63		139.86		139.86		147.63		\$	1,188.81					
Elkhart Telephone Company		38.85		38.85		38.85		38.85		38.85		\$	310.80					
Golden Belt Telephone Association Inc		528.36		481.74		489.51		497.28		450.66		\$	3,807.30					
Gorham Telephone Company		54.39		54.39		62.16		69.93		77.70		\$	536.13					
H & B Communications Inc		15.54		15.54		15.54		15.54		15.54		\$	132.09					
Haviland Telephone Company		559.44		551.67		536.13		536.13		536.13		\$	4,250.19					
Home Telephone Co Inc		15.54		15.54		15.54		15.54		15.54		\$	124.32					
JBN Telephone Company Inc		186.48		186.48		186.48		186.48		186.48		\$	1,468.53					
KanOkla Telephone Association		295.26		303.03		295.26		310.80		318.57		\$	2,463.09					
LaHarpe Telephone Co		264.18		264.18		271.95		271.95		271.95		\$	2,183.37					
Madison Telephone LLC		85.47		85.47		69.93		69.93		69.93		\$	606.06					
Mokan Dial Inc		287.49		287.49		271.95		279.72		295.26		\$	2,229.99					
Moundridge Telephone Company		178.71		194.25		178.71		194.25		170.94		\$	1,429.68					
Mutual Telephone Company		31.08		38.85		38.85		38.85		38.85		\$	303.03					
Peoples Telecommunications, LLC		287.49		295.26		287.49		271.95		264.18		\$	2,222.22					
Pioneer Telephone Association Inc		435.12		435.12		435.12		411.81		427.35		\$	3,372.18					
Rainbow Telecommunications Association Inc		124.32		124.32		124.32		124.32		116.55		\$	971.25					
Rural Telephone Service Co Inc dba Nex-Tech		380.73		380.73		380.73		372.96		365.19		\$	2,952.60					
S & A Telephone Company Inc		334.11		334.11		326.34		326.34		326.34		\$	2,626.26					
S & T Telephone Coop Assn		217.56		209.79		209.79		209.79		202.02		\$	1,655.01					
S&T Communications, LLC		419.58		419.58		404.04		396.27		404.04		\$	3,209.01					
South Central Telephone Assn Inc		62.16		62.16		62.16		54.39		54.39		\$	458.43					
Southern Kansas Telephone Company Inc		209.79		186.48		139.86		124.32		108.78		\$	1,639.47					
Consolidated Communications of Kansas Company		54.39		54.39		54.39		54.39		54.39		\$	435.12					
Totah Communications Inc		69.93		69.93		69.93		69.93		69.93		\$	559.44					
Tri-County Telephone Assn. Inc		116.55		116.55		116.55		124.32		116.55		\$	940.17					
Twin Valley Telephone Inc		271.95		256.41		256.41		256.41		248.64		\$	2,027.97					
United Telephone Association Inc		108.78		101.01		93.24		101.01		101.01		\$	800.31					
United Telephone of Kansas d/b/a CenturyLink		1,421.91		1,398.60		1,375.29		1,351.98		1,351.98		\$	10,916.85					
Wamego Telecommunications Co Inc		108.78		108.78		108.78		77.70		93.24		\$	792.54					
Wheat State Telephone Inc DBA Wheat State		271.95		271.95		271.95		256.41		248.64		\$	2,090.13					
Wilson Telephone Company Inc		101.01		101.01		101.01		116.55		116.55		\$	862.47					
Zenda Telephone Company Inc		23.31		23.31		23.31		23.31		23.31		\$	186.48					
Your Tel America dba Terra Com Wireless		12,478.62		12,377.61		8,290.59		7,956.48		7,397.04		\$	68,647.95					
Rainbow Communications, LLC		170.94		163.17		170.94		163.17		163.17		\$	1,344.21					
Cunningham Communications Inc		334.11		334.11		326.34		-		629.37		\$	2,533.02					
Nex-Tech Wireless LLC		745.92		738.15		745.92		730.38		730.38		\$	5,850.81					
IdeaTek Telecom, LLC		217.56		202.02		170.94		163.17		155.40		\$	1,390.83					
United Wireless Communications Inc		264.18		279.72		279.72		279.72		256.41		\$	2,097.90					
Twin Valley Communications, Inc.		15.54		15.54		15.54		15.54		15.54		\$	124.32					
NE Colorado Cellular, Inc.dba Viaero Wireless		155.40		155.40		155.40		147.63		139.86		\$	1,181.04					
Midcontinent Communications		209.79		209.79		209.79		202.02		202.02		\$	1,655.01					
Total	\$	24,172.47	\$	23,916.06	\$	19,689.18	\$	18,912.18	\$	18,881.10	\$	18,344.97	\$	17,948.70	\$	17,505.81	\$	159,370.47

Reviewed by Judi Ushio 120721

Line	Description	Reference		
1	Annual Administrative Costs - FY 25	[1] Administration Contract	\$	209,994
2	Estimated Annual Increase - 2.50%			5,250
3	Total Estimated Administrative Costs - FY 26		\$	215,244
4	Additional Administrative Costs	Court Case Costs		522
5	Legal Costs	Court Case Costs		4,032
6	Total Administrative Costs		\$	219,798
7	Carrier Audit Expense	Administration Contract		256,171
8	Estimated Annual Increase - 2.50%			6,404
9	Total Estimated Administrative Costs - FY 26		\$	262,576
<u>3rd Party Audit</u>				
10	Financial Audit	[1] CliftonLarsonAllen, LLP	\$	20,150
11	Agreed-Upon-Procedure Review			13,100
12	Total KUSF Audit Costs		\$	33,250
13	<b>Total Annual KUSF Administration and Audit Costs</b> (Line 6 + 9 + 12)			<b>\$ 515,624</b>
	<i>(To SKR-1, page 1, line 6)</i>			

Notes:

- [1] All contracts with the Corporation Commission may be downloaded at:  
[https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS\\_SUPPLIER\\_MENU.KS\\_PROCR\\_CNTRCT.GBL](https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL).

Utilities Division  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027



Phone: 785-271-3220  
Fax: 785-271-3357  
<http://kcc.ks.gov/>

Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

July 22, 2021

Ms. Judi Ushio, State Funds Manager GVNW Consulting, Inc.  
2270 La Montana Way  
Colorado Springs, CO 80918

RE: KUSF Audit Invoices for work performed January 1 – June 30, 2021

Dear Judi,

This letter authorizes GVNW Consulting, Inc. (GVNW) to withdraw \$189,492.69 from the Kansas Universal Service Fund (KUSF) for carrier audit services performed for January 1 through June 30, 2021, consistent with Section 2.2.D. 15 of the KUSF Administration contract between Kansas Corporation Commission and GVNW (Contract).

Pursuant to Section 3 of the Contract, the maximum reimbursement to GVNW for carrier audit work performed between March 1, 2020, and February 28, 2021, is \$260,801.00. GVNW invoiced \$115,833.81 for work performed between March 1 and June 30, 2020, and \$124,585.00 for work performed between July 1 and December 31, 2020, leaving \$20,332.19 for work performed in January and February 2021. GVNW, however, invoiced \$20,494.50 for January and February 2021; \$162.31 over the contract amount. GVNW will, therefore, be reimbursed \$20,332.19 for audit expenses for January and February 2021.

The March 1, 2021, through February 28, 2022, contract amount is \$256,171.27, of which GVNW invoiced \$169,160.50 for work performed in March through June 2021. The remaining contract amount for work performed between March 2021 and February 2022 is \$87,010.77.

Staff's review indicates the expenses GVNW invoiced are reasonable and proper and Staff authorizes GVNW to withdraw \$189,492.69 from the KUSF.

Please contact Ms. Sandy Reams at (785) 271-3130 or myself at (785) 271-3221 if you have any questions concerning this letter.

Sincerely,

A handwritten signature in cursive script that reads "Jeff McClanahan".

Jeff McClanahan  
Director of Utilities

cc: Sandy Reams, Assistant Chief of Telecommunications  
Kelly Mabon, Senior Telecommunications Analyst

<b>Activity Month Data Month</b>	<b>Apr-21 Mar-21</b>	<b>May-21 Apr-21</b>	<b>Jun-21 May-21</b>	<b>Jul-21 Jun-21</b>
Beginning Balance	\$ 2,335,197	\$ 2,410,966	\$ 2,809,475	\$ 3,156,668
Surplus/(Deficit) - page 2	75,769	398,508	347,193	(113,089)
Ending Balance	<u>2,410,966</u>	<u>2,809,475</u>	<u>3,156,668</u>	<u>3,043,579</u>
TAG Mobile Receivable	942,299	942,299	942,299	942,299
Ending Balance with Receivable	<u>\$ 3,353,265</u>	<u>\$ 3,751,774</u>	<u>\$ 4,098,967</u>	<u>\$ 3,985,878</u>
<b>Activity Month Data Month</b>	<b>Aug-21 Jul-21</b>	<b>Sep-21 Aug-21</b>	<b>Oct-21 Sep-21</b>	<b>Nov-21 Oct-21</b>
Beginning Balance	\$ 3,043,579	\$ 3,212,601	\$ 3,419,695	\$ 3,438,974
Surplus/(Deficit) - page 2	169,022	207,093	19,279	188,440
Ending Balance	<u>\$ 3,212,601</u>	<u>\$ 3,419,695</u>	<u>\$ 3,438,974</u>	<u>\$ 3,627,414</u>
TAG Mobile Receivable	942,299	942,299	942,299	942,299
Ending Balance with Receivable	<u>\$ 4,154,900</u>	<u>\$ 4,361,994</u>	<u>\$ 4,381,273</u>	<u>\$ 4,569,713</u>
<b>***Projected**</b>				
<b>Activity Month Data Month</b>	<b>Dec-21 Nov-21</b>	<b>Jan-22 Dec-21</b>	<b>Feb-22 Jan-22</b>	<b>Mar-22 Feb-22</b>
Beginning Balance	\$ 3,627,414	\$ 3,695,462	\$ 3,760,044	\$ 3,817,753
Projected Surplus/(Deficit) - page 2	68,048	64,582	57,709	(29,302)
Ending Balance	<u>\$ 3,695,462</u>	<u>\$ 3,760,044</u>	<u>\$ 3,817,753</u>	<u>\$ 3,788,451</u>
TAG Mobile Receivable	942,299	942,299	942,299	942,299
Ending Balance with Receivable	<u>\$ 4,637,761</u>	<u>\$ 4,702,343</u>	<u>\$ 4,760,052</u>	<u>\$ 4,730,750</u>

To Exhibit SKR-1, ln. 8



Activity Month Data Month	As Reported										Average	***Projected***					Annual Total
	Apr-21 Mar-21	May-21 Apr-21	Jun-21 May-21	Jul-21 Jun-21	Aug-21 Jul-21	Sep-21 Aug-21	Oct-21 Sep-21	Nov-21 Oct-21	Mar - Oct 21 Total	Dec-21 Nov-21		Jan-22 Dec-21	Feb-22 Jan-22	Mar-22 Feb-22			
<b>Revenues/ Receipts:</b>																	
LECs/Electing Carriers												\$ 8,509,020	\$ 8,509,020	\$ 8,509,020	\$ 8,509,020	\$ 104,088,575	
Wireless												11,239,220	11,223,109	11,223,109	11,223,109	138,115,776	
Interconnected VoIP												1,714,470	1,697,822	1,655,428	1,655,428	20,867,641	
IXC/Others												9,856,482	9,857,275	9,836,260	9,836,260	122,183,524	
Total	\$ 33,179,299	\$ 33,631,355	\$ 33,607,447	\$ 32,210,299	\$ 32,381,520	\$ 32,669,444	\$ 31,993,564	\$ 32,229,995	\$ 261,902,923	\$ 32,737,865	\$ 32,737,865	\$ 31,319,192	\$ 31,287,225	\$ 31,223,817	\$ 31,223,817	\$ 385,255,516	
<b>Assessment Rate</b>																	
Fund Assessments	\$ 3,596,636	\$ 3,645,639	\$ 3,643,047	\$ 3,394,227	\$ 3,503,179	\$ 3,542,016	\$ 3,394,140	\$ 3,493,732	\$ 28,212,615	\$ 3,526,577	\$ 3,526,577	10.84%	10.84%	10.84%	10.84%	\$ 41,768,474	
Prior Year Adjustments	(124,033)	55,618	\$ 1,885	5,258	3,521	905	(38,122)	-	(94,968)	(11,871)	(11,871)	(11,871)	(11,871)	(11,871)	(11,871)	\$ (142,452)	
Interest, Penalties, Misc. Rev.	3,461	7,942	5,055	4,623	5,041	2,053	1,367.08	752	30,294	3,787	3,787	3,787	3,787	3,787	3,787	45,441	
Revenue Retention/ (Write-Offs)	-	(1,552)	-	-	-	(29,180)	-	-	(30,732)	(5,122)	(5,122)	-	-	-	-	(30,732)	
KUSF Receipts	\$ 3,476,064	\$ 3,707,647	\$ 3,649,987	\$ 3,404,107	\$ 3,511,740	\$ 3,515,795	\$ 3,357,385	\$ 3,494,484	\$ 28,117,209	\$ 3,513,371	\$ 3,513,371	\$ 3,386,916	\$ 3,383,451	\$ 3,376,577	\$ 3,376,577	\$ 41,640,731	
<b>Disbursements:</b>																	
High Cost Support	\$ 3,319,806	\$ 3,243,827	\$ 3,243,827	\$ 3,243,827	\$ 3,244,895	3,244,895	3,244,895	3,244,895	26,030,867	\$ 3,253,858	\$ 3,253,858	3,244,895	3,244,895	3,244,895	3,244,895	\$ 39,010,447	
KUSF Support Changes - RLECs									-	\$ -	\$ -	-	-	-	-	-	
Telecommunications Relay Services	24,327	20,151	16,530	20,388	25,264	23,390	25,811	20,474	176,334	\$ 22,042	\$ 22,042	22,311	22,311	22,311	22,311	265,576	
TAP	14,204	3,516	4,854	26,823	3,876	4,346	31,139	3,936	92,695	\$ 11,587	\$ 11,587	13,521	13,521	13,521	13,521	146,779	
Lifeline	24,172	23,916	19,689	19,223	18,570	18,345	17,949	17,506	159,370	\$ 19,921	\$ 19,921	19,921	19,921	19,921	19,921	239,056	
Administrator Carrier Audit Fees	-	-	-	189,108	-	-	-	-	189,108	\$ 94,554	\$ 94,554	-	-	-	87,011	276,119	
3rd Party Audit Fees	-	-	-	-	32,300	-	-	-	32,300	\$ 16,150	\$ 16,150	-	-	-	-	32,300	
Administration (Net of Penalties)	17,500	17,500	17,500	17,500	17,500	17,500	17,500	17,500	140,000	\$ 17,500	\$ 17,500	17,500	17,500	17,500	17,500	210,000	
Other Administration Fees [1]	-	-	138	-	88	-	-	-	88	\$ 313	\$ 313	52	52	52	52	522	
Legal Fees [1]	-	-	-	98	-	-	-	715	1,428	\$ 448	\$ 448	448	448	448	448	4,032	
Bank Fees	285	229	255	230	225	225	96	218	1,764	\$ 221	\$ 221	221	221	221	221	2,646	
Certified Mail, Misc.	-	-	-	-	-	-	-	-	-	\$ -	\$ -	-	-	-	-	-	
Monthly Disbursements	\$ 3,400,295	\$ 3,309,139	\$ 3,302,794	\$ 3,517,197	\$ 3,342,718	\$ 3,308,701	\$ 3,338,106	\$ 3,306,043	\$ 26,824,992	\$ 3,436,333	\$ 3,436,333	3,318,869	3,318,869	3,318,869	3,405,879	40,187,477	
Operating Surplus/(Deficit)	\$ 75,769	\$ 398,508	\$ 347,193	\$ (113,089)	\$ 169,022	\$ 207,093	\$ 19,279	\$ 188,440	\$ 1,292,217	\$ 77,037	\$ 77,037	\$ 68,048	\$ 64,582	\$ 57,709	\$ (29,302)	\$ 1,453,254	

Notes:  
[1] Includes additional time related to the TAG Mobile bankruptcy case.

**Kansas Universal Service Fund**  
Statement of Fund Performance - April 2021  
Prepared for the Kansas Corporation Commission

	Activity for Apr-21	Year to Date Results for FY 2021 - 2022
<b>ASSESSMENT BASIS</b>		
Intrastate Revenue	\$ 33,179,299.26	\$ 33,179,299.26
<b>FUND REVENUES</b>		
Fund Assessments	\$ 3,596,636.04	\$ 3,596,636.04
Out of Period Adjustments	(124,032.67)	(124,032.67)
Late Payment Charges	1,429.20	1,429.20
Late Worksheet Penalties	1,600.00	1,600.00
Outstanding Balance Penalty	402.84	402.84
Change Election Fees	-	-
Account Write Offs	-	-
Interest Income - Investment Account	28.73	28.73
Total Revenue	<u>\$ 3,476,064.14</u>	<u>\$ 3,476,064.14</u>
<b>FUND DISBURSEMENTS</b>		
Relay Services	\$ 24,326.65	\$ 24,326.65
TAP	14,204.46	14,204.46
Lifeline	24,172.47	24,172.47
High Cost Support	3,319,806.00	3,319,806.00
Audit Fees	-	-
External Audit Fees	-	-
Program Administration	17,500.00	17,500.00
Other Administration	-	-
Legal Fees	-	-
Bank Fees	285.49	285.49
Total Disbursements	<u>\$ 3,400,295</u>	<u>\$ 3,400,295</u>
<b>MISCELLANEOUS INC (EXP)</b>		
Administrator Penalty	-	-
<b>Total Miscellaneous</b>	<u>-</u>	<u>-</u>
<b>Operating Surplus / (Deficit)</b>	<u>\$ 75,769.07</u>	<u>\$ 75,769.07</u>

<b>Fund Balances for April 2021</b>	
Beginning Fund Balance	\$ 2,335,197
Operating Surplus (Deficit)	75,769
Ending Fund Balance	<u><u>\$ 2,410,966</u></u>
TAG Mobile Accrual of Receivable	
Per Docket No. 16-TAGC-323-SHO	942,299
Ending Fund Balance w/Receivable	<u><u>\$ 3,353,265</u></u>

May 14, 2021

Prepared by Vantage Point Solutions, Inc.  
Reviewed by Judi Ushio

**Kansas Universal Service Fund**  
Statement of Fund Performance - November 2021  
Prepared for the Kansas Corporation Commission

	Activity for Nov-21	Year to Date Results for FY 2021 - 2022
<b>ASSESSMENT BASIS</b>		
Intrastate Revenue	\$32,229,995.16	\$ 261,902,923.32
<b>FUND REVENUES</b>		
Fund Assessments	\$ 3,493,731.53	\$ 28,212,615.05
Out of Period Adjustments	-	(94,968.16)
Late Payment Charges	220.31	8,739.27
Late Worksheet Penalties	200.00	18,685.27
Outstanding Balance Penalty	312.38	2,599.64
Change Election Fees	-	100.00
Account Write Offs	-	(30,731.88)
Interest Income - Investment Account	19.44	169.59
Total Revenue	<u>\$ 3,494,483.66</u>	<u>\$ 28,117,208.78</u>
<b>FUND DISBURSEMENTS</b>		
Relay Services	\$ 20,473.97	\$ 176,334.11
TAP	3,935.60	92,695.03
Lifeline	17,505.81	159,370.47
High Cost Support	3,244,895.00	26,030,867.00
Audit Fees	-	189,108.19
External Audit Fees	-	32,300.00
Program Administration	17,500.00	140,138.21
Other Administration	87.50	175.00
Legal Fees	1,427.65	2,240.15
Bank Fees	217.84	1,764.04
Total Disbursements	<u>\$ 3,306,043</u>	<u>\$ 26,824,992</u>
<b>MISCELLANEOUS INC (EXP)</b>		
Administrator Penalty	-	-
<b>Total Miscellaneous</b>	<u>-</u>	<u>-</u>
<b>Operating Surplus / (Deficit)</b>	\$ 188,440	\$ 1,292,217

<b>Fund Balances for November 2021</b>	
Beginning Fund Balance	\$ 3,438,973
Operating Surplus (Deficit)	188,440
Ending Fund Balance	<u>\$ 3,627,414</u>
TAG Mobile Accrual of Receivable Per Docket No. 16-TAGC-323-SHO	<u>942,299</u>
Ending Fund Balance w/Receivable	<u>\$ 4,569,713</u>

December 13, 2021

Prepared by Vantage Point Solutions, Inc.  
Reviewed by Judi Ushio

Company	Activity Month Data Month	As Reported								As Projected				Total	Method	Election
		Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-20	Jan-21	Feb-21	Mar-21			
		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Average	Nov-20	Dec-20	Jan-21	Feb-21		
Blue Valley Tele-Communications Inc	*															*
Consolidated Communications of Missouri Company	*															*
Columbus Communications Services, Inc.	*															*
Tri-County Telephone-Council Grove Study Area	*															*
Craw-Kan Telephone Co-op Inc	*															*
Cunningham Telephone Company Inc	*															*
Elkhart Telephone Company	*															*
Golden Belt Telephone Association Inc	*															*
Gorham Telephone Company	*															*
H & B Communications Inc	*															*
Haviland Telephone Company	*															*
Home Telephone Co Inc	*															*
JBN Telephone Company Inc	*															*
KanOkla Telephone Association	*															*
LaHarpe Telephone Co	*															*
Madison Telephone LLC	*															*
Mokan Dial Inc	*															*
Moundridge Telephone Company	*															*
Mutual Telephone Company	*															*
Peoples Telecommunications, LLC	*															*
Pioneer Telephone Association Inc	*															*
Rainbow Telecommunications Association Inc	*															*
Rural Telephone Service Co Inc dba Nex-Tech	*															*
S & A Telephone Company Inc	*															*
S & T Telephone Coop Assn	*															*
South Central Telephone Assn Inc	*															*
Southern Kansas Telephone Company Inc	*															*
Consolidated Communications of Kansas Company	*															*
Totah Communications Inc	*															*
Tri-County Telephone Assn. Inc	*															*
Twin Valley Telephone Inc	*															*
United Telephone Association Inc	*															*
Wamego Telecommunications Co Inc	*															*
Wheat State Telephone Inc	*															*
Wilson Telephone Company Inc	*															*
Zenda Telephone Company Inc	*															*
<b>Total - RLECs</b>		\$ 1,689,405	\$ 1,685,862	\$ 1,675,949	\$ 1,665,477	\$ 1,660,602	\$ 1,646,852	\$ 1,638,442	\$ 1,638,206	\$ 1,662,599	\$ 1,628,319	\$ 1,628,319	\$ 1,628,319	\$ 1,628,319	\$ 19,814,069	
United Telephone of Kansas d/b/a CenturyLink	*															*
Southwestern Bell Telephone Company	*															*
<b>GRAND TOTAL</b>		<b>\$ 8,837,131</b>	<b>\$ 8,858,280</b>	<b>\$ 9,254,268</b>	<b>\$ 8,447,047</b>	<b>\$ 8,611,426</b>	<b>\$ 8,843,304</b>	<b>\$ 8,669,796</b>	<b>\$ 8,531,244</b>	<b>\$ 8,756,562</b>	<b>\$ 8,509,020</b>	<b>\$ 8,509,020</b>	<b>\$ 8,509,020</b>	<b>\$ 8,509,020</b>	<b>\$ 104,088,575</b>	

		As Reported								As Projected							
Activity Month	Data Month	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21		Dec-21	Jan-22	Feb-22	Mar-22			
Company		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Average	Nov-21	Dec-21	Jan-22	Feb-22	TOTAL	Method	Election
Sprint Spectrum LP (Sprint PCS)	*																*
Topeka Cellular Telephone Company, Inc	*																*
Kansas #15 Limited Partnership	*																*
Tempo Telecom, LLC	*																*
Your Tel America dba Terra Com Wireless	*																*
Cellico Partnership	*																*
Alltel Corporation fka AllTel Communications	*																*
d/b/a Verizon Wireless	*																*
New Cingular Wireless PCS, LLC	*																*
Spok, Inc	*																*
Onstar LLC	*																*
Assurance Wireless USA L.P.	*																*
MobilePage, Inc.	*																*
Global Connection Inc of America d/b/a Stand Up Wireless	*																*
Ztar Mobile, Inc.	*																*
USCOC of Nebraska/Kansas LLC	*																*
Nex-Tech Wireless LLC	*																*
T-Mobile Central LLC	*																*
Cellular Network Partnership	*																*
United Wireless Communications Inc	*																*
American Messaging Services, LLC	*																*
i-Wireless LLC	*																*
Consumer Cellular Inc	*																*
NE Colorado Cellular, Inc.dba Viaero Wireless	*																*
Boomerang Wireless, LLC	*																*
Ready Wireless, LLC	*																*
TracFone Wireless, Inc.	*																*
Q Link Wireless, LLC	*																*
PureTalk Holdings, Inc.	*																*
Flash Wireless, LLC	*																*
UVNV, Inc.	*																*
Cricket Wireless LLC	*																*
MetroPCS Michigan LLC	*																*
Kynect Communications, LLC	*																*
SelecTel, Inc.	*																*
Patriot Mobile, LLC	*																*
US Mobile LLC	*																*
Excellus Communications, LLC	*																*
Tello, LLC	*																*
Comcast OTR1, LLC	*																*
Lycamobile USA, Inc.	*																*
Visible Service LLC	*																*
iTalk Mobile Corporation	*																*
Liberty Mobile Wireless LLC	*																*
Hello Mobile Telecom, LLC	*																*
China Telecom (Americas) Corporation	*																*
Spectrum Mobile LLC	*																*
Locus Telecommunications, LLC	*																*
STX Group LLC dba Twigby	*																*
Mint Mobile, LLC	*																*
Best Buy Health, Inc. dba GreatCall	*																*
Dish Wireless LLC	*																*
Gabb Wireless, Inc.	*																*
CSC Wireless, LLC	*																*
SurgePhone Wireless LLC	*																*
Glo Tell US Corp. dba V-Tell	*																*
Zefcom, LLC dba Affinity Cellular dba Club Cellular	*																*
Social Communications LLC	*																*
Orbic North America, LLC	*																*
J Rhodes Enterprises, LLC dba Titanium Wireless	*																*
Cox Wireless, LLC	*																*
Marconi Wireless Holdings, LLC	*																*
Avaya Cloud Inc	*																*
AltaWorx, LLC	*																*
Google North America, Inc. dba Google Fi	*																*
Plintron Technologies USA LLC	*																*
Earthlink, LLC	*																*
GRAND TOTAL		\$ 12,328,483	\$ 11,229,954	\$ 11,639,792	\$ 11,219,350	\$ 11,826,375	\$ 11,839,189	\$ 11,340,353	\$ 11,783,733	\$ 11,657,553	\$ 11,239,220	\$ 11,223,109	\$ 11,223,109	\$ 11,223,109	\$ 138,115,776		

		As Reported								As Projected								
Activity Month	Data Month	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Average	Dec-21	Jan-22	Feb-22	Mar-22	TOTAL	Method	Election	
Company		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21		Nov-21	Dec-21	Jan-22	Feb-22				
Mitel Cloud Services Inc.	*																*	
Sprint Communications Company LP	*																*	
Comtech 21 LLC	*																*	
ANPI Business, LLC	*																*	
Accessline Communications Corporation	*																*	
Cable One Inc	*																*	
IP Networked Services Inc	*																*	
MCC Telephony of the Midwest LLC	*																*	
Vonage America LLC	*																*	
nexVortex, Inc	*																*	
Momentum Telecom Inc	*																*	
8 X 8 Inc	*																*	
iTalk Global Communications, Inc.	*																*	
Phone.com, Inc.	*																*	
Ring Central Inc	*																*	
Skype Communications US Corporation	*																*	
Teliax Inc	*																*	
Via Talk LLC	*																*	
Voice Ring Inc	*																*	
Vonage Business Inc	*																*	
BCI Telephone of Kansas, LLC	*																*	
CCI Network Services, LLC	*																*	
Kosmaz Technologies LLC	*																*	
Appia Communications, Inc.	*																*	
Interface Security Systems LLC	*																*	
OOMA, Inc.	*																*	
VoIP Innovations LLC	*																*	
XCAST LABS, INC.	*																*	
Crexendo Business Solutions, Inc.	*																*	
Atwood Cable Systems, Inc.	*																*	
Grasshopper Group, LLC	*																*	
Skybeam, LLC	*																*	
LBiSat LLC	*																*	
Unitel Voice, LLC	*																*	
Dynalink Communications, Inc.	*																*	
AMG Technology Investment Group, LLC	*																*	
Northeast Rural Service, Inc	*																*	
Tru Mobility, Inc.	*																*	
Meriplex Telecom, LLC	*																*	
WANSIX, Inc.	*																*	
Solve Networks, Inc.	*																*	
Nextiva Inc.	*																*	
Intrado IP Communications	*																*	
Onvoy, LLC	*																*	
Star2Star Communications, LLC	*																*	
Spectrum Advanced Services LLC	*																*	
Fuze Inc	*																*	
Network Innovations, Inc.	*																*	
Jive Communications, Inc.	*																*	
Sumner Cable TV Inc.	*																*	
CallTower, Inc.	*																*	
Wheatland Electric Cooperative d/b/a	*																*	
City Tele Coin Company, Inc.	*																*	
Fonality Inc.	*																*	
EvolveIP, LLC	*																*	
Zito West Holding LLC	*																*	
ViaSat, Inc.	*																*	
Cytracom, LLC	*																*	
SIP.US LLC	*																*	
TampaBay DSL Inc. d/b/a PBX-Change	*																*	
GlobalPhone Corp.	*																*	
Greenfly Networks, Inc.	*																*	
Hughes Network Systems, LLC	*																*	
NetFortris Acquisition Co., Inc.	*																*	
ISG Technology LLC	*																*	
Magna5, LLC	*																*	

Activity Month		As Reported								As Projected					TOTAL	Method	Election
Company	Data Month	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22				
		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Average	Nov-21	Dec-21	Jan-22	Feb-22			
Iloka, Inc.	*																*
Zultys, Inc.	*																*
COMM-CORE, LLC	*																*
WaveNation, LLC	*																*
TDS Metrocom, LLC	*																*
Select Communications, LLC	*																*
Dialpad, Inc.	*																*
Bandwidth, Inc.	*																*
Broad Communications Solutions, LLC	*																*
Chicago Business VoIP, LLC	*																*
IPitomy Communications, LLC	*																*
Telzio, Inc.	*																*
VanillaSoft Corp.	*																*
TelAgility Corp.	*																*
Kansas Communication Services Inc.	*																*
Cloudcall, Inc.	*																*
iCommerce Services, Inc.	*																*
Distributed Computing, Inc.	*																*
Google Fiber North America, Inc.	*																*
No More PBX LLC	*																*
SimpleVoIP, LLC	*																*
Affiliated Technology Solutions, Inc.	*																*
2 Talk, LLC	*																*
Towner Communications LLC	*																*
Voyant Communications, LLC	*																*
Sangoma U.S., Inc.	*																*
DSCI, LLC	*																*
MagicJack SMB, Inc.	*																*
RG Fiber LLC	*																*
upNetwork, Inc.	*																*
VirtuPhone LLC	*																*
Framework Communications, LLC	*																*
Broadsmart Global, Inc.	*																*
EM3 Networks, LLC	*																*
JMZ Corporation	*																*
WTC Technologies, Inc.	*																*
W W T, Inc.	*																*
Verge Network Solutions, Inc.	*																*
ITC Global Networks, LLC	*																*
Vision, Voice and Data Systems, LLC	*																*
AcuityVOIP, LLC	*																*
PanTerra Networks, Inc.	*																*
Estech Systems, Inc.	*																*
Hypercore Networks Inc.	*																*
ICIM Corporation	*																*
Mercury Wireless Kansas, LLC	*																*
FluentStream Technologies, LLC	*																*
Tri-County Communications	*																*
Nuso, LLC	*																*
Netelligent Corporation	*																*
NEC Cloud Communications America, Inc.	*																*
Pulsar360 Corp.	*																*
Global VoIP LLC	*																*
Google Voice Inc.	*																*
Wiensco LLC dba Commworld of Kansas	*																*
Network Computing Solutions	*																*
Konica Minolta Business Solutions USA,	*																*
Forerunner Technologies, Inc.	*																*
Kansas Information Technologies, LLC	*																*
ConnectMe, LLC	*																*
Telecom Evolutions, LLC	*																*
Eagle Broadband, LLC	*																*
APX Net Inc.	*																*
Aureon Communications, LLC	*																*
BA Telecom, Inc.	*																*
Coco Solutions, LLC	*																*
Junction Networks Inc.	*																*
Zoom Voice Communications Inc.	*																*
Versatel, LLC d/b/a 46 Labs	*																*

Activity Month		As Reported								As Projected					TOTAL	Method	Election
Company	Data Month	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Average	Dec-21	Jan-22	Feb-22	Mar-22			
		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21		Nov-21	Dec-21	Jan-22	Feb-22			
Strongcord Infrastructure Systems	*																*
White Label Communications, LLC	*																*
BT Americas Inc.	*																*
TailWind Voice and Data, Inc.	*																*
Allegiant Networks LLC	*																*
4Voice LLC	*																*
Lightspeed CLEC Inc	*																*
Medtel Communications LLC	*																*
Epic Touch Co.	*																*
TrueVoip Corp.	*																*
Broadband Voice, LLC	*																*
Marco Technologies, LLC	*																*
Cloudli Communications Inc. f/k/a BBTel	*																*
Snapcom LLC	*																*
VolPLY, LLC	*																*
Stellar Private Cable Systems, Inc.	*																*
Unified Global Solutions, LLC	*																*
Telmate, LLC	*																*
AMP Networks LLC dba PressONE	*																*
LimeBox Networks, LLC	*																*
My Wifi Guy, LLC dba Zenith Technology	*																*
Ring Street, LLC	*																*
Teligent IP fka Iptimi Inc	*																*
Mango Voice LLC	*																*
Onepath Systems, LLC	*																*
Clear Rate Communications, Inc.	*																*
Genesys Telecommunications	*																*
Syndeo LLC dba Broadvoice	*																*
Butler Rural Electric Coop Assn., Inc.	*																*
ThinQ Technologies, Inc.	*																*
Regional Media Corporation, Inc.	*																*
IDF SBA Fund	*																*
OneStream Networks, LLC	*																*
PayG, LLC	*																*
Unified Telecom Inc. DBA CCSI	*																*
One Voice Communications, Inc.	*																*
NSV Connect, LLC	*																*
PGB Fiber, LLC d/b/a Pioneer	*																*
Thing5 LLC	*																*
SIP2020, LLC	*																*
Atlanta DataCom, Inc.	*																*
Fulton Communications, Inc. d/b/a Vertical	*																*
DPAccess, LLC	*																*
T3 Communications, Inc.	*																*
Dyopath, LLC	*																*
United Office Inc.	*																*
Wired Telecom, LLC	*																*
GRAND TOTAL		\$ 1,941,835	\$ 1,584,694	\$ 1,712,964	\$ 1,575,014	\$ 1,687,974	\$ 1,830,668	\$ 1,885,673	\$ 1,925,668	\$ 1,777,860	\$ 1,714,470	\$ 1,697,822	\$ 1,655,428	\$ 1,655,428	\$ 20,867,641		



Company	Activity Month Data Month	As Reported										As Projected					TOTAL	Method	Election	
		Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-21							
		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Average	Nov-21	Dec-21	Jan-22	Feb-22						
Blue Valley Technologies Inc. (fka One Point Technologies, Inc.)	*																	*		
Blue Valley Tele-Communications Inc	*																	*		
Columbus Communication Services, LLC	*																	*		
Fiber Communications of Columbus, LLC	*																	*		
TC Wireless, Inc.	*																	*		
Tri-County Telephone-Council Grove Study Area	*																	*		
Haviland Telephone Company, Inc	*																	*		
LaHarpe Telephone Co Inc	*																	*		
MT Networks, LLC	*																	*		
Mokan Communications Inc	*																	*		
Moundridge Telecom Inc	*																	*		
Mutual Telephone Co	*																	*		
S & A Communications	*																	*		
S&T Communications, LLC	*																	*		
South Central Wireless Inc	*																	*		
SNKT - Metro	*																	*		
Tri-County Telephone Assn Inc	*																	*		
Wheat State Telephone DBA Wheat State Technologies	*																	*		
Wilson Communication Co Inc	*																	*		
Global Crossing Telecommunications Inc.	*																	*		
Securus Technologies, LLC	*																	*		
Amerivision Communications Inc	*																	*		
Business Telecom, LLC	*																	*		
DeltaCom, LLC	*																	*		
Easton Telecom Services LLC	*																	*		
Pioneer Long Distance	*																	*		
KanOkla Communications, LLC	*																	*		
Matrix Telecom, LLC	*																	*		
MCI Communication Services LLC	*																	*		
MCIMetro Access Transmission Services, LLC	*																	*		
Netwolves Network Services, LLC	*																	*		
Nos Communications, Inc	*																	*		
PNG Telecommunications Inc	*																	*		
Communications Company, LLC	*																	*		
Transworld Network Corp	*																	*		
United Communications Association Inc	*																	*		
Working Assets Funding Service Inc	*																	*		
International Telecom, LLC	*																	*		
McLeod USA Telecommunications Services LLC	*																	*		
inContact, Inc	*																	*		
Nex-Tech LLC	*																	*		
Reliant Communications, Inc	*																	*		
Global Crossing Local Services, Inc.	*																	*		
QuantumShift Communications Inc d/b/a Vcom Solutions	*																	*		
Teleport Communications America, LLC	*																	*		
CBTS Technology Solutions, LLC	*																	*		
Electric Lightwave, LLC	*																	*		
Call One, Inc.	*																	*		
Witel Communications LLC	*																	*		
Windstream NuVox Kansas, LLC	*																	*		
Enhanced Communications Network, Inc.	*																	*		
Craw-Kan Telephone Co-op Inc	*																	*		
Level 3 Communications, LLC	*																	*		
Telecove Operations, LLC	*																	*		
Fusion Connect, LLC	*																	*		
Value Added Communications	*																	*		
Giant Communications Inc	*																	*		
XO Communication Services, LLC	*																	*		
Inmate Communications	*																	*		
Verizon Long Distance LLC	*																	*		
Windstream New Edge, LLC	*																	*		
Enhanced Communications Group LLC	*																	*		
AT&T Corp.	*																	*		
PaeTec Communications, LLC	*																	*		
Access One Inc	*																	*		
USA Digital Communications, Inc.	*																	*		
WTC Communications Inc	*																	*		
Long Distance	*																	*		
NetworkIP, LLC	*																	*		

Company	Activity Month Data Month	As Reported										As Projected					TOTAL	Method	Election
		Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Average	Dec-21	Jan-22	Feb-22	Mar-21					
Cox Kansas Telecom LLC	*																	*	
ACN Communication Services LLC	*																	*	
Nebraska Tech & Telecom Inc	*																	*	
Windstream Norlight, LLC	*																	*	
Long Distance Consolidated Billing Co.	*																	*	
Totel Customer Services Inc	*																	*	
SBC Long Distance LLC	*																	*	
Metropolitan Telecommunications of Kansas Inc (MetTel)	*																	*	
Custom Teleconnect Inc	*																	*	
Sage Telecom Communications, LLC	*																	*	
Intrado Communications, LLC	*																	*	
X2Comm, Inc.	*																	*	
BCN Telecom Inc	*																	*	
Wholesale Carrier Services Inc	*																	*	
Level 3 Telecom of Kansas City LLC	*																	*	
BullsEye Telecom, Inc.	*																	*	
Global Tel*Link Corporation	*																	*	
d/b/a Long Distance Services	*																	*	
Unite Private Networks, LLC	*																	*	
National Access Long Distance Inc	*																	*	
Business Network Long Distance Inc	*																	*	
BW Telecom Long Distance, Inc.	*																	*	
Consolidated Communications Enterprise Services, Inc.	*																	*	
Empire District Industries, Inc-	*																	*	
Broadwing Communications LLC	*																	*	
Telrite Corporation	*																	*	
Broadband Dynamics LLC	*																	*	
Convergia Inc	*																	*	
Granite Telecommunications, LLC	*																	*	
H & B Cable Services Inc	*																	*	
Advantage Telecommunications Corp	*																	*	
DCT Telecom Group LLC	*																	*	
TouchTone Communications	*																	*	
France TELECOM	*																	*	
BCM One, Inc.	*																	*	
Communications Network Billing Inc	*																	*	
Inmate Calling Solutions LLC	*																	*	
Telecom Mgmt Inc dba Pioneer Telephone	*																	*	
TelAtlantic Communications, Inc.	*																	*	
Airespring Inc	*																	*	
Gorham Telephone Company (LD)	*																	*	
SKT Inc	*																	*	
Rainbow Communications, LLC	*																	*	
Voicecom Telecommunications, LLC	*																	*	
GBT Communications Inc	*																	*	
800 Response Information Services LLC	*																	*	
Cunningham Communications Inc	*																	*	
H & B Communications Inc (2)	*																	*	
Network Service Billing Inc	*																	*	
IdeaTek Telecom, LLC	*																	*	
Nationwide Long Distance Service Inc	*																	*	
Windstream Communications, LLC	*																	*	
Integrated Services Inc	*																	*	
Comcast Phone of Kansas LLC	*																	*	
Encartele Inc	*																	*	
First Communications LLC	*																	*	
Multiline Long Distance Inc	*																	*	
Avid Communications LLC	*																	*	
Cause Based Commerce, Inc	*																	*	
LR Communications, Inc.	*																	*	
New Horizons Communications Corp	*																	*	
Twin Valley Communications, Inc.	*																	*	
First Choice Technology Inc.	*																	*	
Globalstar USA LLC	*																	*	
Conterra Ultra Broadband LLC	*																	*	
Public Communication Services Inc	*																	*	
Home Communications Inc	*																	*	
Broadview Networks, Inc.	*																	*	
Neutral Tandem-Kansas LLC	*																	*	
HCI Telcom Inc	*																	*	

Company	Activity Month Data Month	As Reported										As Projected					TOTAL	Method	Election
		Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-21						
		Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Average	Nov-21	Dec-21	Jan-22	Feb-22					
Cebridge Telecom KS, LLC	*																*		
Stratus Networks Inc	*																*		
Entelegent Solutions, Inc.	*																*		
Kansas Fiber Network, LLC	*																*		
Zayo Group, LLC	*																*		
Peerless Network of Kansas, LLC	*																*		
Airus, Inc.	*																*		
WiMacTel, Inc.	*																*		
Valu-Net, LLC	*																*		
Spectrotel of the Midwest LLC	*																*		
GC Pivotal, LLC	*																*		
Time Warner Cable Business LLC	*																*		
Socket Telecom LLC	*																*		
Network, LLC	*																*		
Scissortail Communications, LLC	*																*		
Combined Public Communications, Inc.	*																*		
WANRack, LLC	*																*		
Midcontinent Communications	*																*		
SageNet LLC	*																*		
Triton Networks, LLC	*																*		
Garmin Services Inc	*																*		
Fusion Cloud Services, LLC	*																*		
Velocity, A Managed Service Company Inc.	*																*		
GoDaddy.com, LLC	*																*		
ServiceTitan, Inc.	*																*		
GRAND TOTAL		\$ 10,750,056	\$ 10,868,183	\$ 10,467,490	\$ 10,218,643	\$ 10,161,218	\$ 10,206,498	\$ 10,170,151	\$ 9,955,007	\$ 10,349,656	\$ 9,856,482	\$ 9,857,275	\$ 9,836,260	\$ 9,836,260	\$ 122,183,524				

KUSF Annual  
Revenue Growth/Decline Analysis  
(Reported Revenues)

	<i>Projected Yr. 25</i> <i>2021/2022</i>	Year 24 2020/2021	Annual Change		2 Year Average
			Revenue	Percent	
RLECs	\$ 19,814,069	\$ 20,571,042	\$ (756,973)	-3.68%	-4.15%
CenturyLink	*				*
SWBT	*				*
Wireless	138,115,776	167,786,953	(29,671,177)	-17.68%	-18.73%
VoIP	20,867,641	20,265,781	601,860	2.97%	0.17%
IXCs/Others	122,183,524	129,545,540	(7,362,016)	-5.68%	-5.96%
Total	\$ 385,255,516	\$ 427,208,744	\$ (41,953,228)	-8.56%	-10.69%
	Year 24 2020/2021	Year 23 2019/2020	Annual Change		2 Year Average
			Revenue	Percent	
RLECs	\$ 20,571,042	\$ 21,566,942	\$ (995,901)	-4.62%	-4.74%
CenturyLink	*				*
SWBT	*				*
Wireless	167,786,953	209,173,699	(41,386,746)	-19.79%	-20.09%
VoIP	20,265,781	20,811,068	(545,287)	-2.62%	-1.11%
IXCs/Others	129,545,540	138,170,863	(8,625,323)	-6.24%	-7.35%
Total	\$ 427,208,744	\$ 490,020,918	\$ (62,812,174)	-12.82%	-13.22%
	Year 23 2019/2020	Year 22 2018/2019	Annual Change		
			Revenue	Percent	
RLECs	\$ 21,566,942	\$ 22,670,110	\$ (1,103,168)	-4.87%	
CenturyLink	*				*
SWBT	*				*
Wireless	209,173,699	262,790,290	(53,616,591)	-20.40%	
VoIP	20,811,068	20,726,206	84,862	0.41%	
IXCs/Others	138,170,863	150,938,169	(12,767,306)	-8.46%	
Total	\$ 490,020,918	\$ 567,264,942	\$ (77,244,024)	-13.62%	
	Projected Yr 25 Revenues	Recognized Proj. Growth/ Decline %	Projected Revenue Change	N/A Plus: Rebalancing	Projected Yr. 25 Revenue
RLECs	\$ 19,814,069	-4.00%	\$ (792,563)	\$ -	\$ 19,021,506
CenturyLink	*				*
SWBT	*				*
Wireless	138,115,776	-18.75%	(25,896,708)	-	112,219,068
VoIP	20,867,641	0.50%	104,338	-	20,971,979
IXCs/Others	122,183,524	-5.75%	(7,025,553)	-	115,157,971
Totals	\$ 385,255,516	-10.71%	\$ (41,273,808)	\$ -	\$ 343,981,708

\*REDACTED\*

12/15/2021

**Comparison: Projected Year 24 Revenues To Reported Revenues**

Category	Projected FY 24 Revenue for FY 25 Assessment (1) (A)	Reported Year 24 Assessable Revenues (B)	Difference (C = B - A)
ILECs	\$ 111,648,184	\$ 109,610,471	\$ (2,037,713)
Wireless	171,964,147	167,786,953	(4,177,194)
Interconnected VoIP	18,818,486	20,265,781	1,447,295
IXCs/Others	135,223,451	129,545,540	(5,677,911)
Total	\$ 437,654,268	\$ 427,208,744	\$ (10,445,524)
Average Monthly Revenues	\$ 36,471,188.98	\$ 35,600,728.69	\$ (870,460)
Net KUSF Obligation	\$ 41,139,945	\$ 41,139,945	\$ 41,139,945
Calculated Assessment Rate	9.40%	9.63%	0.23%

**Comparison: Original Projected Year 25 Revenue To Current Projected FY 25 Revenue**

Category	Projected FY 25 Revenues for Assessment (2) (A)	Current FY 25 Projected Revenues (B)	Difference C = (B - A)
ILECs	\$ 99,761,651	\$ 104,088,575	\$ 4,326,924
Wireless	138,367,220	138,115,776	(251,444)
VoIP	17,305,662	20,867,641	3,561,979
IXCs/Others	121,763,873	122,183,524	419,651
Total (2)	\$ 377,198,407	\$ 385,255,516	\$ 8,057,110
Average Monthly Revenues	\$ 31,433,201	\$ 32,104,626	\$ 671,426
Net KUSF Obligation	\$ 40,872,330	\$ 40,872,330	\$ -
Calculated Assessment Rate	10.84%	10.61%	-0.23%

**Comparison: Impact of Revenue Adjustment Factor/Projections on FY 26 Revenues and Assessment Rate**

Category	Current FY 25 Projected Revenues (A)	Projected FY 26 Revenues (B)	Difference (C = B - A)
LECs/Electing Carriers	\$ 104,088,575	\$ 95,632,689	\$ (8,455,886)
Wireless	138,115,776	112,219,068	(25,896,708)
Interconnected VoIP	20,867,641	20,971,979	104,338
IXCs/Others	122,183,524	115,157,971	(7,025,553)
Total	\$ 385,255,516	\$ 343,981,708	\$ (41,273,808)
Average Monthly Revenues	\$ 32,104,626	\$ 28,665,142	\$ (3,439,484)
Estimated KUSF Obligation	\$ 39,347,365	\$ 39,347,365	\$ -
Calculated Assessment Rate	10.21%	11.44%	1.23%

Notes:

(1) KUSF Year 24 projected revenue (March 2020 - Feb. 2021), December 13, 2019 Direct Testimony of Sandra K. Reams, Exhibit SKR-1, p. 2; Attachment L, Docket No. 20-GIMT-086-GIT.

STATE OF ~~KANSAS~~ NEW JERSEY )  
 ) ss.  
COUNTY OF ~~SHAWNEE~~  
 MIDDLESEX )

VERIFICATION

Sandy Reams, being duly sworn upon her oath deposes and states that she is an Assistant Chief of Telecommunications for the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that she has read and is familiar with the foregoing *Direct Testimony* and attests that the statements contained therein are true and correct to the best of her knowledge, information and belief.

Sandy Reams

Sandy Reams  
Assistant Chief of Telecommunications  
State Corporation Commission of the  
State of Kansas

Subscribed and sworn to before me this 14<sup>th</sup> day of December, 2021.



My Appointment Expires: 10/19/2025

Ishleen Mankatala  
12/14/2021

STATE OF NEW JERSEY  
COUNTY - MIDDLESEX



## **CERTIFICATE OF SERVICE**

22-GIMT-142-GIT

I, the undersigned, certify that a true and correct copy of the above and foregoing testimony was electronically delivered this 16th day of December, 2021, to the following:

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## **CERTIFICATE OF SERVICE**

22-GIMT-142-GIT

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*Abigail Emery*  
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