



November 2, 2023

Ms. Lynn M. Retz – [l.retz@kcc.ks.gov](mailto:l.retz@kcc.ks.gov)  
Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027

RE: Docket No. 24-NCMC-109-KSF (Company Code KS005122)

*In the Matter of the Audit of Network Communications Intl Corp., dba NCIC  
Immate Communications by the Kansas Universal Service Fund (KUSF)  
Administrator Pursuant to K.S.A. 66-2010(b) for Fiscal Year 26, March 2022 -  
February 2023*

Dear Ms. Retz:

In its July 7, 2023 Order, the Kansas Corporation Commission (KCC) directed Vantage Point Solutions (VPS) to perform a KUSF carrier audit of NCIC Immate Communications (NCIC or Company) to ensure that the data submitted to the KUSF via the KUSF CRWs, the assessments paid, and the calculation and application of the flow-through surcharge billed to and collected from NCIC's customers, if applicable, are appropriate and accurate.

The KCC directed VPS to file two (2) versions of the audit report with the KCC; one (1) version containing confidential information and one (1) version with the confidential data redacted for public disclosure. NCIC's audit does not require a separate confidential report; therefore, only the enclosed public audit report for NCIC is being filed.

Copies of the supporting documentation, including VPS' audit work papers and information provided by the company, are not included with the audit report, but are available from VPS, upon request.

Sincerely,

  
Shomari Jackson

cc: Steve Garrett -[s.garrett@kcc.ks.gov](mailto:s.garrett@kcc.ks.gov)

## CERTIFICATE OF SERVICE

I hereby certify that on this 2<sup>nd</sup> day of November, 2023, the above Kansas Universal Service Fund Audit Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

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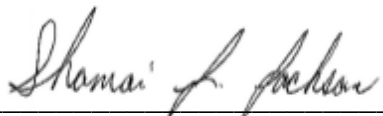
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COMMUNICATIONS  
607 EAST WHALEY ST  
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Shomari Jackson

**Vantage Point Solutions, Inc.**  
**Audit Report for**  
**Network Communications Intl Corp. dba NCIC Inmate Communications**

**From:** Shomari Jackson, Auditor

**Company Personnel:** Stephanie Jackson, Controller

**Date:** October 31, 2023

**On-Site Visit Date:** October 17-18, 2023

**KUSF Status:** Current with Reporting & Payment obligations

**Re:** Docket No. 24-NCMC-109-KSF

*In the Matter of the Audit of Network Communications Intl Corp. dba NCIC Inmate Communications by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022 – February 2023.*

**Audit Summary**

Pursuant to the Kansas Corporation Commission's (KCC or Commission) August 15, 2023 Order, Vantage Point Solutions, Inc. (VPS) conducted an audit of Network Communications Intl Corp. dba NCIC Inmate Communications (NCIC or Company) based on the Kansas Universal Service Fund (KUSF) Audit Procedures adopted for KUSF Fiscal Year 26 (FY 26).<sup>1</sup> VPS did not identify any KUSF reporting deficiencies during the course of the audit of NCIC.

VPS recommends the Commission issue an Order to adopt this Audit Report and close the Docket.

The Company is current with its KUSF obligations.

NCIC agrees with the Audit Report.

**Background**

During the course of the audit, VPS issued seventeen (17) Data Requests (DRs) to NCIC.

NCIC operates as a reseller of interexchange services (IXC) and an operator service provider (OSP)<sup>2</sup>, headquartered in Longview, TX.

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<sup>1</sup> Order Accepting VPS' KUSF Proposed Revisions to Selection Criteria and Carrier Review Procedures, Docket No. 22-GIMT-142-GIT, Jun. 27, 2023 (22-142 Order).

<sup>2</sup> Order Granting Certificate, Docket No. 00-NCMC-043-COC, Sep. 8, 1999.

NCIC is required to report its revenue and pay the related assessments to the KUSF on a monthly basis.<sup>3</sup> The Company is authorized to collect an amount equal to or less than its KUSF assessment from customers, and does so.<sup>4</sup> The Company is not a designated Eligible Telecommunications Carrier (ETC) in Kansas, therefore, it does not offer Lifeline services to its customers.

Pursuant to Commission Order,<sup>5</sup> VPS confirmed that NCIC does not offer assessable and non-assessable services in a bundle. The Company collects the KUSF surcharge and reports revenues based on the actual operator service intrastate calls. The Company states it uses this same allocation methodology for Federal USF (FUSF) and KUSF purposes.<sup>6</sup>

### **Current KUSF Obligations**

The Company is current with its KUSF obligations.<sup>7</sup>

### **Current Audit Findings**

VPS conducted the audit of NCIC in accordance with the KUSF Audit Procedures adopted by the KCC.<sup>8</sup> Based on the referenced procedures, VPS did not identify any audit findings and provides the following recommendation:

**Recommendation:** VPS recommends the Commission issue an Order to adopt this Audit Report and close the Docket.

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<sup>3</sup> Order Setting the Kansas Universal Service Fund Assessment Rate for Year Ten and Establishing Reporting Requirements, Docket No. 06-GIMT-332-GIT, Jan. 23, 2006 (06-332 Order).

<sup>4</sup> K.S.A. 66-2008(a).

<sup>5</sup> Order Determining KUSF Contribution Methodology, ¶ 27, Docket No. 14-GIMT-105-GIT, Oct. 20, 2016.

<sup>6</sup> Response to DR 17.

<sup>7</sup> Confirmed with the KUSF Administrator on Oct. 30, 2023.

<sup>8</sup> 22-142 Order.