

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

Before Commissioners: Susan K. Duffy, Chair
Dwight D. Keen
Andrew J. French

In the Matter of a General Investigation into)
the Adjustment of Intrastate Switched Access) Docket No. 21-GIMT-021-GIT
Charges for Rural Telephone Companies in)
Compliance with K.S.A. 66-2005(e) and)
Federal Communications Commission)
Reforms.)

**ORDER OPENING DOCKET; REQUIRING COMPLIANCE FILINGS;
ESTABLISHING PROCEDURAL SCHEDULE**

NOW, the above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

Background

1. K.S.A. 66-2005(c) states that “[e]ach rural telephone company shall adjust its intrastate switched access rates on March 1 of each odd-numbered year to match its interstate switched access rates...” Additionally, K.S.A. 66-2005(c)(1) provides that “[a]ny reduction of a rural telephone company’s cost recovery due to reduction of its intrastate access revenue, except such revenue recovered from another support mechanism, shall be recovered from the KUSF.”¹

2. The purpose of this Docket is to determine the rural local exchange carriers’ (RLECs’) intrastate switched access rate adjustments necessary to maintain parity with interstate rates, determine each RLEC’s calculated net intrastate access revenue increase or reduction, and determine the corresponding adjustment to each RLEC’s annual KUSF support.

¹KUSF refers to the Kansas Universal Service Fund. See K.S.A. 66-2008.

Jurisdiction and Authority

3. The Commission holds full power, authority and jurisdiction to supervise and control the local exchange carriers pursuant to K.S.A. 66-1,188. Their rates must be just and reasonable pursuant to K.S.A. 66-1,189 and filed with the Commission pursuant to K.S.A. 66-1,190.

4. K.S.A. 66-2005(c) specifically mandates the intrastate switched access rate adjustments and corresponding KUSF modifications at issue in this proceeding.

Staff's Report and Recommendation

5. Commission Staff (Staff) submitted a Report and Recommendation (R&R) regarding this matter dated July 9, 2020, attached hereto as Exhibit A and made a part hereof by reference.

6. Staff's R&R contains a recitation of the relevant Commission and Federal Communications Commission (FCC) rulings to date with respect to intrastate access charges and KUSF adjustments.

7. The most pertinent rulings with respect to the Commission's administration of this matter include: 1) the Commission utilizes July 1 rather than March 1 in order to coincide with the FCC's reforms to intercarrier compensation;² 2) RLECs are required to adjust their intrastate originating rates to parity in odd-numbered years and their intrastate terminating rates annually pursuant to FCC rules;³ and 3) RLECs' intrastate terminating access revenue reductions are to be offset by Access Recovery Charge (ARC) and Connect America Fund (CAF) support from the FCC pertaining to intrastate access revenue recovery.⁴

²Exhibit A, pp. 3-4.

³Id. at 4.

⁴Id. at 4.

8. Staff explains that the adjustment to an RLEC's intrastate access revenue and annual KUSF support will be based on the difference between its interstate and intrastate access rates as of July 1, 2020, and the access minutes of use (MOU) for the twelve-month period ending June 30, 2020.⁵

9. In order to determine the necessary rates and KUSF modifications, Staff recommends the Commission require the RLECs to submit the data contained in Attachment 1 to its R&R, a copy of which will be placed on the Commission's website at <https://kcc.ks.gov/telecommunications/service-provider-forms>.⁶

10. Staff also recommended the following procedural schedule for this matter: each RLEC shall file in the Docket and e-mail an Excel copy of Attachment 1 to Staff by August 21, 2020; Staff shall submit a Report with recommendations by September 18, 2020; parties may file Responses to Staff's R&R by September 30, 2020; with the Commission's anticipated Order no later than November 27, 2020; and the KUSF support adjustments and new rates becoming effective July 1, 2021.

Findings and Conclusions

11. The Commission finds Staff's findings and recommendations to be reasonable and hereby adopts the same.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. This Docket is opened for the purposes of administering K.S.A. 66-2005(c)'s requirement for the RLECs to implement adjustments to their access rates in odd-numbered years.

B. All RLECs are made parties to this docket. Parties that enter their appearance shall provide an e-mail address and indicate whether they consent to electronic service.

⁵Id. at 2.

⁶Then open the link titled "Rural LEC Access Attachment 1 (Excel format)."

C. The Commission adopts the procedural schedule referenced above in paragraph 10.

D. RLECs shall file in this Docket the data contained in Attachment 1 to Staff's R&R by August 21, 2020. RLECs shall also e-mail a Microsoft Excel version of the same information to Staff by the same date, attention Sandy Reams: s.reams@kcc.ks.gov, and copy Christine Aarnes: c.aarnes@kcc.ks.gov. An electronic copy of Attachment 1 can be downloaded from the Commission's website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>.⁷ RLECs do not need to serve Attachment 1 on any other party - only file it in the Docket and provide a copy to Staff by the required due date.

E. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).⁸

BY THE COMMISSION IT IS SO ORDERED.

Duffy, Chair; Keen, Commissioner; French, Commissioner

Dated: 07/21/2020



Lynn M. Retz
Executive Director

MRN

⁷Then open the link titled "Rural LEC Access Attachment 1 (Excel format)."

⁸K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Chair Susan Duffy
Commissioner Dwight D. Keen
Commissioner Andrew J. French

FROM: Sandy Reams, Assistant Chief of Telecommunications
Christine Aarnes, Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: July 9, 2020

SUBJECT: Docket No. 21-GIMT-021-GIT
In the Matter of a General investigation Into the Adjustment of Intrastate Switched Access Charges for Rural Telephone Companies in Compliance with K.S.A. 66-2005(e) and Federal Communications Commission Reforms.

EXECUTIVE SUMMARY

Staff recommends the Commission issue an Order to open a docket to address the rural local exchange carriers' (RLECs) intrastate switched access rate, revenue, and Kansas Universal Service Fund (KUSF) support adjustments, consistent with K.S.A. 66-2005(c) and the Federal Communications Commission's (FCC's) access reforms. Each RLEC should be required to complete and file Attachment 1, enclosed with this Report and Recommendation (R&R), in this Docket and provide a copy, in Excel format, to Staff by August 21, 2020. Staff also recommends each RLEC that has its own interstate tariff provide a copy of or a link to its July 1, 2020, tariff to Staff at s.reams@kcc.ks.gov and c.aarnes@kcc.ks.gov. Staff further recommends the Commission: (1) place Attachment 1 on its website so it may be downloaded by an RLEC; (2) direct Staff to file its recommendations in the Docket by September 18, 2020; (3) allow parties to respond to Staff's recommendations by September 30, 2020; and (4) issue an Order on Staff's recommendations no later than November 27, 2020, to allow adequate time for Staff to incorporate the relevant KUSF support adjustments in its annual KUSF assessment rate testimony that will be filed in December 2020.

BACKGROUND

I. Biennial Intrastate Access Adjustments - K.S.A. 66-2005(c)

Pursuant to K.S.A. 66-2005(c) and Commission Order,¹ all RLECs are required to reduce their intrastate switched access rates to interstate levels effective July 1st of each odd-numbered year. Any reduction in an RLEC's intrastate access revenue due to the reduction of its intrastate access rates, except for such revenue recovered from another support mechanism, is recovered from the KUSF.² Recovery of any aggregate access revenue reduction is limited, for all of the RLECs, to .75% of the intrastate retail revenues used to set the KUSF assessment rate and if the amount of revenue to be recovered from the KUSF exceeds the revenue limit, the remaining revenue and rate adjustments are deferred until the next odd-numbered year. Staff does not anticipate this provision will apply since the \$437.7 million intrastate revenue base used to determine the 9.40% KUSF assessment rate³ means the total revenue recoverable from the KUSF is limited to approximately \$3.3 million.

For interstate access purposes, Columbus Communications Services, LLC (Columbus); LaHarpe Telephone Company, Inc. (LaHarpe); Pioneer Telephone Association, Inc. (Pioneer); Moundridge Telephone Company (Moundridge); Rural Telephone Service Co., Inc. (Rural); Totah Telephone Co., Inc. (Totah); Twin Valley Telephone, Inc. (Twin Valley); and Wamego Telecommunications Company, Inc. (Wamego) maintain their own interstate access tariffs.⁴ The remaining RLECs concur in the National Exchange Carrier Association's (NECA) interstate access pools and tariff.

NECA's tariffed rates are based on pooling its RLEC members' costs and usage to determine the rates necessary to allow members to recover their interstate access revenue requirement. The tariff contains Rate Bands, meaning rates vary to allow members with higher costs to have higher rates and those with lower costs to have lower rates. NECA's tariff includes numerous end-office switching Rate Bands; however, terminating end office switching is now bill-and-keep or zero (\$0.00). NECA's tariff includes two tandem switch service Rate Bands, separately for originating and for terminating service.⁵

The adjustment to an RLEC's intrastate access revenue and annual KUSF support will be based on the difference between its interstate and intrastate access rates as of July 1, 2020, and the access minutes of use (MOU) for the twelve-month period ending June 30, 2020. Between 1997 and 2000, the RLECs' intrastate switched access rates were reduced to parity with their interstate rates;⁶ however, in 2000 the RLECs' MOU declined enough that their interstate access rates needed to increase to ensure recovery of their interstate access revenue requirements. The Commission addressed the issue of whether an RLEC is required to decrease its intrastate access rates to parity or whether the rates should also increase to maintain parity. The Commission

¹ Order Implementing Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, Docket No. 13-GIMT-004-GIT (Docket 13-004), Sept. 14, 2012 (Sept. 2012 Order).

² K.S.A. 66-2005(c)(1).

³ Order Adopting KUSF Assessment Rate, Jan. 23, 2020; and Direct Testimony of Sandra Reams, p. 5, Exhibit SKR-1, p. 2, Dec. 13, 2019; Docket No. 20-GIMT-086-GIT.

⁴ Moundridge, Pioneer, and Totah's interstate tariffs are included in John Staurulakis, Inc.'s FCC Tariff No. 1. Rural and Wamego's interstate tariffs are included in Alexicon Telecommunications Consulting, Inc.'s FCC Tariff No. 1.

⁵ Tandem switch services include tandem switched facility, termination, and switching.

⁶ Order, Docket No. 94-GIMT-478-GIT, Dec. 27, 1996.

determined K.S.A. 66-2005 focuses on rate parity and an RLEC's rates must be adjusted to maintain parity, whether an increase or decrease,⁷ with the RLEC's KUSF support being adjusted accordingly. The Commission most recently addressed the RLECs' intrastate access rate and KUSF support adjustments pursuant to K.S.A. 66-2005(c) in Docket No. 19-GIMT-006-GIT.⁸

For intrastate access tariff purposes, all of the RLECs except Columbus and LaHarpe concur in Blue Valley's tariff. Moundridge, Pioneer, Rural, Totah, Twin Valley, and Wamego concur with some rates in Blue Valley's tariff and, for the rates with which they do not concur, separate company-specific rates are identified in Blue Valley's tariff. Interstate terminating and originating access rates are adjusted annually, with member RLECs authorized to increase intrastate terminating and originating rates to remain at parity with NECA's rates.⁹ Companies that do not participate in NECA's access pool and tariff adjust their intrastate originating access rates to parity with their interstate rates, but must retain the lower of the current intrastate or interstate terminating access rates

II. Federal Communications Commission (FCC) Reforms

In November 2011, the FCC determined all LECs would transition their interstate and intrastate terminating switched end office and certain transport access rates to bill-and-keep.¹⁰ The FCC capped all interstate originating and terminating switched access and reciprocal compensation rates and intrastate terminating access rates, but not originating rates, for rate-of-return carriers. The FCC established the Access Recovery Charge (ARC) and Connect America Fund (CAF) for revenue recovery purposes. All of the Kansas RLECs operate under rate-of-return regulation.

The FCC has determined NECA's access rates must be adjusted, upward or downward, to reflect an RLEC entering or exiting the access pool.¹¹ This means an RLEC concurring in NECA's tariff adjusts its intrastate rates to parity, but non-NECA participants cannot increase intrastate terminating access rates when the rate is lower than the corresponding interstate rate.¹²

III. Impact of FCC Reforms on Kansas Biennial Requirement

The FCC's reforms resulted in conflicts with K.S.A. 66-2005(c). K.S.A. 66-2005(c) requires an RLEC to adjust its intrastate switched access rates to parity with its interstate rates on March 1st of odd-numbered years instead of July 1st as required for the FCC's reforms. The Commission harmonized the effective dates by determining the RLECs will adjust their intrastate access rates

⁷ Order, Docket No. 01-GIMT-081-GIT, Jan. 4, 2001.

⁸ Order Adopting Revised Intrastate Originating Switched Access Rates, Revenues, and KUSF Adjustments, Oct. 18, 2018, and Order Adopting Revised Intrastate Access Rates and KUSF Adjustment for Twin Valley, June 4, 2019, Docket No. 19-GIMT-006-GIT.

⁹ Order, *In the Matter of Connect America Fund*, WC Docket 10-90, rel. March 27, 2013 (March 2013 Order).

¹⁰ Report and Order and Further Notice of Proposed Rulemaking, *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, (Nov. 2011 Order).

¹¹ March 2013 Order.

¹² Sept. 2012 Order. See also 47 C.F.R. §51.909 and Order, CC Docket No. 01-92, rel. March 31, 2014, ¶7-9.

to parity on July 1st, concurrent with the FCC's effective date.¹³

The FCC also requires terminating rates be adjusted annually compared to K.S.A. 66-2005(c)'s requirement for intrastate access rates to be adjusted to parity every two years. The Commission harmonized these requirements by determining the RLECs will adjust their intrastate originating rates to parity in odd-numbered years and their intrastate terminating rates annually pursuant to FCC rules.¹⁴

Lastly, K.S.A. 66-2005(c)(1) requires an RLEC recover intrastate access revenue changes from the KUSF "except such revenue recovered from another support mechanism . . .". The Commission, therefore, determined an RLEC is required to reduce a calculated intrastate terminating access revenue reduction by the ARC and CAF support it receives for intrastate revenue recovery.¹⁵

ANALYSIS

Each RLEC's corresponding KUSF support adjustment will need to be determined; therefore, each RLEC will need to complete and file Attachment 1. As a result of the FCC's terminating access reforms, effective July 1, 2020, all of the RLECs' interstate and intrastate terminating end office access rates are at bill-and-keep; thus, only intrastate terminating switched tandem rates are subject to adjustment in this Docket. An RLEC participating in NECA's tariff should reflect intrastate terminating tandem rate adjustments to maintain parity with NECA's rates, while RLECs not participating in NECA's tariff should only reflect intrastate terminating tandem rate reductions.¹⁶ An RLEC should also reflect adjustments to its intrastate originating switched end office and tandem access rates to be in parity with its corresponding interstate rates.

Staff needs to review each RLEC's data and, if Staff has any questions about the data, contact the company. Staff needs to perform the adjustment calculations for all of the RLECs and submit a Report and Recommendation supporting the access rate, revenue, and KUSF support adjustments. The KUSF support adjustments determined in this Docket will be included in Staff's annual KUSF assessment rate calculations to be filed in December 2020, but effective July 1, 2021, based upon July 1, 2020, disparities between the interstate and intrastate rates.

RECOMMENDATION

Staff recommends the Commission open a proceeding to address the RLECs' intrastate switched access rate, revenue, and KUSF support adjustments, consistent with K.S.A. 66-2005(c) and the FCC's access reforms. Staff recommends the Commission place Attachment 1 on its website so it

¹³ Id. *See also* Order Opening Docket; Requiring RLEC Data Filings; Procedural Schedule; Discovery Order; Protective Order; General Service Matters, Docket 15-GIMT-068-GIT, Aug. 26, 2014.

¹⁴ Id. *See also* Docket 13-004, Order Adopting Commission Staff's Calculations and Recommendations Regarding Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, Nov. 7, 2012; Order Requiring RLECs to File Revised Intrastate Access Rate Data and Tariffs, Directing Staff to Submit an R&R With Updated Information, and Clarifying Tariff Revision Filing Deadlines and Effective Dates, April 10, 2013; Order Nunc Pro Tunc, April 17, 2013; and Order Approving RLECS' Intrastate Access Rates and Revenues and a Net, Aggregate Reduction to the Kansas Universal Service Fund, May 22, 2013.

¹⁵ Order, Opening Docket to Determine Intrastate Access Revenues Due to Rural Local Exchange Carriers, Docket No. 16-GIMT-468-GIT, April 26, 2016.

¹⁶ Sept. 2012 Order.

may be downloaded by an RLEC and direct the RLECs to file a completed Attachment 1 in the Docket by August 21, 2020, and provide an Excel copy of Attachment 1 to Staff at s.reams@kcc.ks.gov and c.aarnes@kcc.ks.gov prior to or concurrent with filing Attachment 1 in the Docket. Staff also recommends any RLEC with its own interstate tariff be directed to provide a copy of or link to the tariff for rate verification purposes. Staff should be directed to file its Report and Recommendations by September 18, 2020, with parties allowed to file a response to Staff's Report by September 30, 2020. Staff further recommends the Commission issue an Order on Staff's recommendations no later than November 27, 2020, to allow adequate time for Staff to incorporate the relevant KUSF support adjustments in its annual KUSF assessment rate testimony that will be filed in December 2020.

TELEPHONE COMPANY:

Name

Contact Name:

Contact Phone No.:

Contact EMail:

** Based on Volumes for Twelve Months July 1, 2019 through June 30, 2020 **

Information on this Page will automatically update when the Originating and Terminating Worksheets are completed.

KUSF SUPPORT ADJUSTMENT DETERMINATION - ORIGINATING ONLY:

1	Annual IntraState Originating Access Revenues (p. 2, col. E, line 8)	\$	-
2	LESS: Intrastate Originating Revenues @ Interstate Rate (p. 2, col. F, line 8)	\$	-
3	Annual KUSF Support (Increase)/Reduction Adjustment (Line 2 less 1)	\$	-
4	Monthly KUSF Support Adjustment (Line 3/12)	\$	-

KUSF SUPPORT ADJUSTMENT DETERMINATION - TERMINATING ONLY:

5	Annual IntraState Terminating Access Revenues (p. 3, col. E, line 7)	\$	-
6	LESS: Intrastate Terminating Revenues @ Interstate Rate (p. 3, col. F, line 7)		
7	Total Annual KUSF Support (Increase)/Reduction Adjustment (Line 6 less 5)	\$	-
8	Less: ARC/ CAF ICC Recovery (p. 4, col. B, line 6)	\$	-
9	Net Annual KUSF Support (Increase)/Reduction (Line 8 less 7)	\$	-
10	Net Monthly Adjustment (Line 9/12)	\$	-

TOTAL COMPANY/ KUSF SUPPORT IMPACT:

		Annual	Monthly
11	KUSF Support Adjustment - Originating (Line 3)	\$ -	\$ -
12	KUSF Support Adjustment - Terminating (Line 9)	\$ -	\$ -
13	Total Company KUSF Support (Increase)/Reduction	\$ -	\$ -

TELEPHONE COMPANY:

Name

** Based on Volumes for Twelve Months July 1, 2019 through June 30, 2020 **

INTRASTATE - ORIGINATING MOU & RATES

For companies that exited NECA's pool and/or tariff after July 1, 2018: If your company is not identified as having its own interstate tariff, contact KCC Staff, provide a copy of the relevant interstate tariff pages, and NECA's letter advising of the

	RATE ELEMENT	ANNUAL UNITS 6/30/2020	STATE RATE AS OF 7/1/2020	INTERSTATE RATE AS OF 7/1/2020	CURRENT REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
	(A)	(B)	(C)	(D)	(E)	(F)
1	End Office Switching	-	\$ -	\$ -	\$ -	\$ -
2	Info Surcharge (Per 100)				\$ -	\$ -
3	LT Termination				\$ -	\$ -
4	LT Facility Per Min-Mile				\$ -	\$ -
5	Tandem Switching				\$ -	\$ -
6	Local Transport - Other				\$ -	\$ -
7	Other Switched Access				\$ -	\$ -
8	Total Access Revenue				<u>\$ -</u>	<u>\$ -</u>
9	Difference - Current State (E) Less Interstate (F)					\$ -

(a) If your company exited the NECA pool after July 2016, use the intrastate rate in effect prior to exiting the NECA pool.

CROSSCHECK TO BOOKED REVENUE

10	BOOKED SWITCHED INTRASTATE ORIGINATING ACCESS REVENUE	
11	CALCULATED ORIGINATING REVENUE (E9)	\$ -
12	DIFFERENCE *	<u>\$ -</u>

* IF THE DIFFERENCE IS GREATER THAN \$5,000, PLEASE EXPLAIN BELOW.

RESIDUAL KUSF SUPPORT IMPACT:

13	Intrastate Switched Originating Access Revenues (col. E, line 8)	\$ -
14	LESS: Intrastate Terminating Revenues @ Interstate Rate (col. F, line 8)	\$ -
15	Annual KUSF Support (Increase)/Reduction Adjustment (14 less 13)	<u>\$ -</u>

OTHER LOCAL TRANSPORT DETAIL

Instructions: Provide supporting detail for Local Transport - Other, Revenue Changes. Complete this information or furnish comparable workpapers that show the LT calculations. The LT- Other may not automatically update to the revenues in Columns (E) & (F). Please post them from the lines below.

If your company has more usage sensitive rate elements, please insert rows and numbers as necessary.

	RATE ELEMENT	ANNUAL UNITS 6/30/2020	STATE RATE AS OF 7/1/2020	INTERSTATE RATE AS OF 7/1/2020	CURRENT REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
	(A)	(B)	(C)	(D)	(E)	(F)
	Usage Sensitive Rate Elements					
16	Other Transport (List)				\$ -	\$ -
17					\$ -	\$ -
18					\$ -	\$ -
19	Total Local Transport - Other Revenues				<u>\$ -</u>	<u>\$ -</u>

TELEPHONE COMPANY:

Name

** Based on Volumes for Twelve Months July 1, 2019 through June 30, 2020 **

INTRASTATE - TERMINATING MOU & RATES

RATE INCREASES LIMITED TO NECA POOL/TARIFF INCREASES; OTHERWISE, USE THE LOWER OF THE INTERSTATE OR
INTRASTATE RATE IS USED.

RATE ELEMENT	ANNUAL UNITS 6/30/2020	STATE RATE AS OF 7/1/2020	INTERSTATE RATE AS OF 7/1/2020	CURRENT STATE REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
(A)	(B)	(C)	(D)	(E)	(F)
1 End Office Switching				\$ -	\$ -
2 LT Termination				\$ -	\$ -
3 LT Facility Per Min-Mile				\$ -	\$ -
4 Tandem Switching				\$ -	\$ -
5 Local Transport - Other				\$ -	\$ -
6 Other Switched Access				\$ -	\$ -
7 Total Access Revenue				\$ -	\$ -
8 Diff Curr State (E) Less Interstate (F)					\$ -

CROSSCHECK TO BOOKED REVENUE

9 BOOKED REVENUE FOR SWITCHED INTRASTATE TERMINATING ACCESS	
10 CALCULATED TERMINATING REVENUE (E6)	\$ -
11 DIFFERENCE *	\$ -

* IF THE DIFFERENCE IS GREATER THAN \$5,000, PLEASE EXPLAIN BELOW.

RESIDUAL KUSF SUPPORT IMPACT:

12 Annualized Switched Terminating Access Revenues (col. E, line 7)	\$ -
13 LESS: Interstate Terminating Revenues (col. F, line 7)	\$ -
14 Total Annual KUSF Support (Increase)/ Reduction Adjustment - prior to Other Recovery Mechanism(s) (13 less 12)	\$ -

LOCAL TRANSPORT DETAIL

Instructions: Provide supporting detail to understand the Local Transport - Other Revenue Changes. Complete this information or furnish comparable workpapers that show the LT calculations. The LT- Other may not automatically update to the revenues in Columns (E) & (F). Please post them from the lines below.

If your company has more usage sensitive rate elements, please insert rows and numbers as necessary.

RATE ELEMENT	ANNUAL UNITS 6/30/2020	STATE RATE AS OF 7/1/2020	INTERSTATE RATE AS OF 7/1/2020	CURRENT REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
(A)	(B)	(C)	(D)	(E)	(F)
Usage Sensitive Rate Elements					
15 Other Transport (List)				\$ -	\$ -
16				\$ -	\$ -
17 Total Local Transport - Other Revenues				\$ -	\$ -
18 Total Local Transport Revenues				\$ -	\$ -

Intrastate Terminating Access
Revenue Recovered from Other Sources and
Net KUSF Support

TELEPHONE COMPANY:

(name)

INTRASTATE TERMINATING ACCESS REVENUE RECOVERY SUPPORT FROM NON-KUSF SOURCES

	(A)	(B)
1 Gross KUSF Increase - Terminating Access Revenue (page 3, col F, line 8)		\$ -
2 Less: Revenue/Support from Other Recovery Mechanisms:		
3 CAF Support for Intrastate Access (Line 11)	\$ -	
4 ARC Recovery for Intrastate Access (Line 16)	-	
5 Other Recovery for Intrastate Access (Line 17 - List below)	-	
6 Total Terminating Access Revenue Recovered from Other Sources (Line 3+4+5)		\$ -
	#	
7 Net Annual KUSF Support Increase (Line 1 less 6)		<u>\$ -</u>

Intrastate Access Revenue Support from Other Mechanisms:

8 Connect America Fund (CAF) Intrastate Access Recovery Support	
9 Intrastate Access Revenue Requirement Recovery	\$ -
10 Other:	\$ -
11 Total CAF Recovery Support (Lines 8+9+10)	<u>\$ -</u>

	No. Lines	ARC Charge	Annual ARC Support	Intrastate Allocation	ARC Offset
12 Access Recovery Charge (ARC) Intrastate Access Recovery Support					
12 Residential Lines		\$ -	\$ -		\$ -
13 Single Line Business Lines		\$ -	\$ -		\$ -
14 Multi-Line Business Lines		\$ -	\$ -		\$ -
15 Other: List other lines, if applicable (Line 17)		\$ -	\$ -		\$ -
16 Total ARC Support (Lines 12+13+14+15)		<u>\$ -</u>	<u>\$ -</u>		<u>\$ -</u>

17 Other Recovery Support for Intrastate Access Recovery (List and provide amounts)

CERTIFICATE OF SERVICE

21-GIMT-021-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 07/21/2020.

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