### BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support

Docket No. 24-GIMT-612-GIT

### <u>TOTAH COMMUNICATIONS, INC.</u> <u>ELIGIBLE TELECOMMUNICATIONS CARRIER</u> <u>CERTIFICATION AND INFORMATION</u>

Pursuant to Order of the Commission herein Totah Communications, Inc. submits its certification and information supporting its continuing designation as an Eligible Telecommunications Carrier.

Totah Communications, Inc.'s attachments other than Attachments 1 and 5 certifications are filed herewith as proprietary and confidential under seal. The carrier believes that the information contained in these attachments are of such competitive sensitivity that disclosure to any person other than the carrier, the Commission, and Staff is prohibited by K.S.A. 66-1220(a). Disclosure of trade secrets and confidential information to any person, including parties to this proceeding, is prohibited unless the Commission finds the disclosure is warranted, after considering all of the factors in that statute. The carrier believes that disclosure of the information contained in these attachments would have a significant and adverse impact on its competitive stance regarding existing or potential competing entities including wireless carriers, competitive local exchange carriers, and incumbent local exchange carriers. Regulatorily mandated disclosure of any or all of the subject information would create a competitive bias in favor of any actual or potential competitor not required to provide comparable information, reducing or eliminating any benefit to consumers otherwise resulting from unbiased competition and damaging the submitting company's ability to engage in fair competition.

Respectfully submitted,

Mark Doty #14526 GLEASON & DOTY, CHARTERED 401 S. Main, Suite 102 Ottawa, KS 66067 (785) 242-3775 Attorney for Totah Communications, Inc.

### THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:

Andrew J. French, Chairperson Dwight D. Keen, Commissioner Annie Kuether, Commissioner

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support.

Docket No. 24-GIMT-612-GIT

### SECTION 254(e) CERTIFICATION FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT FCC Docket Reference: CC Docket No. 96-45 and KANSAS UNIVERSAL SERVICE FUND SUPPORT (Please type or print legibly) (Circle all Federal and Kansas Support Received)

1. My title is <u>Controller</u> of <u>Totah Communications</u>, Inc. (Company/Cooperative). In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding <u>Totah</u> Communications, Inc. (Company/Cooperative) to the statements made in this certification.

2. <u>Totah Communications, Inc.</u> (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. <u>98-GIMT-241-GIT</u> by order dated <u>December 5, 1997</u> and KUSF support purposes in Docket No. <u>98-GIMT-241-GIT</u> by order dated <u>December 5, 1997</u>.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II A-CAM/ACAM II RBE, RDOF, and/or KUSF received by <u>Totah Communications, Inc.</u>

### Docket No. 24-GIMT-612-GIT Attachment 1

(Company/Cooperative) was used in the proceeding calendar year <u>2023</u> and will be used in the new calendar year <u>2025</u> *only* for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal Telecommunications Act, and/or Kansas statutes and KCC requirements.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.)

Carolyn Campbell Signature

Carolyn Campbell Printed/Typed Name

Executed on June 28, 2024 date.

Email address: <u>carolyn@totahcomm.com</u>

## Annual ETC Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?

### (Yes/No) NO . IF YES, PLEASE COMPLETE THE FOLLOWING:

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected

(If necessary, please provide additional pages.)

**2.** Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

### **ZERO**

**3.** Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

ZERO

4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. Please complete the following, as applicable to your company:

### QUALITY OF SERVICE <u>WIRELINE</u> ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly)

\* 1. My title is <u>Controller</u> of the <u>Totah Communications</u>, Inc. (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding <u>Totah</u> <u>Communications</u>, Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that <u>Totah Communications, Inc.</u> (Company/ Cooperative) is in compliance with the Commission's quality of service standards as adopted in Docket No. 191,206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on  $\underline{Jupt \partial 8}, \underline{\partial b \partial 4}$  (date).

ampbell rolepi

Carolyn Campbell

Printed/Typed Name

### QUALITY OF SERVICE <u>WIRELESS</u> ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)
1. My title is \_\_\_\_\_\_ of the \_\_\_\_\_ (Company/
Cooperative). In this capacity, I am in a position of authority to certify whether the Company/
Cooperative is complying with required quality of service standards. I am binding
\_\_\_\_\_\_(Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_(Company/ Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_(date).

Signature

Print / Typed Name

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**5.** Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R 54.202(a)(2).

### ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT (Please type or print legibly)

1. My title is <u>Controller</u> of the <u>Totah Communications</u>, Inc. (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding <u>Totah Communications</u>, Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that <u>Totah Communications, Inc.</u> (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on  $\underline{\operatorname{Aune} 28_1 2024}$  (date).

arolyn ame Signature

Carolyn Campbell

Printed / Typed Name

**6.** 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline services) throughout the service area for which it has been designated "using media of general distribution." **Please complete the following:** 

			0		
Name of Media	Type of Media	Geographic Areas Reached	Dates Published		
Examiner Enterprise	Newspaper	SE Kansas	09/20/23		
Independence Daily Reporter	Newspaper	SE Kansas	09/23/23		
Elk City Pride	Newspaper	SE Kansas	10/19/23		
Prairie Star	Newspaper	SE Kansas	09/25/23		
Montgomery County Chronicle	Newspaper	SE Kansas	09/25/23		
Totah Communications, Inc.	Directory	SE Kansas	03/01/23		
Totelcsi.com	Website	SE Kansas	01/01/23		

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

ZERO

1.

# COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

My title is of the

(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding \_\_\_\_\_\_(Company/Cooperative) to the statements made in this certification.
2. By this affidavit, I certify that \_\_\_\_\_(Company/Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_(date).

Signature

Printed/Typed Name

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