

August 8, 2025

Ms. Celeste Chaney-Tucker
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Celeste.Chaney-Tucker@ks.gov

RE: Docket No. 25-BCIV-103-KSF

In the Matter of the Audit of BCI Telephone of Kansas, LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 27, Fiscal Year March 2023-February 2024

Dear Ms. Chaney-Tucker:

On June 10, 2025, the Kansas Corporation Commission (KCC or Commission) issued an Order Adopting Vantage Point Solutions' (VPS) Revised Audit Report Nunc Pro Tunc and directed BCI Telephone of Kansas, LLC (BCI or Company) to:

- (1) File audit True-ups for Fiscal Years (FYs) 26, 27, and 28 to include its VoIP Telephone Features, Late Fees, and Paper Billing Fees, and to report the actual KUSF surcharge collected from subscribers in Block C of its CRW;
- (2) Remit \$360.45 to the KUSF;
- (3) Update its billing system to include KUSF surcharge collection for VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues;
- (4) Update its KUSF reporting procedures to include VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues in its reporting and to report the actual KUSF surcharge collection collected from customers in Box C of its CRWs;
- (5) Submit a pleading affirming its use of a company-specific traffic factor study to allocate revenue between interstate and intrastate jurisdictions, the period(s) the methodology was applicable, the intrastate factors applied, and verifying that the Company is using the methodology for both Federal and Kansas USF purposes; and

- (6) File an affidavit, signed by an officer of the Company, attesting that the Company:
- (a) Remitted \$360.45 to the KUSF;
 - (b) Corrected its billing system to include KUSF surcharge collection from its VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues;
 - (c) Corrected its KUSF reporting procedures to include VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues in its reporting and include the amount collected from subscribers in Block C; and
 - (d) Submitted a pleading affirming its use of a company-specific traffic factor study to allocate revenue between interstate and intrastate jurisdictions, the period(s) the methodology was applicable, the intrastate factors applied and verifying that the Company is using the methodology for both Federal and Kansas USF purposes.

The affidavit should provide the date the corrective actions were implemented.

These actions were to be taken within 30 days of the issuance of the Order, or July 11, 2025.

On June 17, 2025, the Company submitted audit True-ups for FYs 26, 27, and 28 to include VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues in its reporting, and included the KUSF surcharge collection collected from customers in Block C.

On July 3, 2025, the Company remitted \$360.46 to the KUSF.

On July 31, 2025, the Company submitted pleadings affirming its use of a company-specific traffic factor for FYs 26, 27, and 28 to allocate revenue between the interstate and intrastate jurisdictions.

Also, on July 31, 2025, the Company filed an affidavit, signed by an officer of the Company, attesting that the Company:

- (a) Remitted \$360.45 to the KUSF;
- (b) Corrected its billing system to include KUSF surcharge collection from its VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues;
- (c) Corrected its KUSF reporting procedures to include VoIP Telephone Features, Late Fees, and Paper Billing Fees revenues in its reporting and include the amount collected from subscribers in Block C; and

- (d) Submitted a pleading affirming its use of a company-specific traffic factor study to allocate revenue between interstate and intrastate jurisdictions, the period(s) the methodology was applicable, the intrastate factors applied and verifying that the Company is using the methodology for both Federal and Kansas USF purposes.

VPS recommends that the Commission determine BCI is in compliance with the Commission's Order and that Docket No. 25-BCIV-103-KSF be closed.

Sincerely,



Shomari Jackson

cc: Steve Garrett - steve.garrett@ks.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of August, 2025, that a true copy of the attached Compliance Report has been sent via electronic mail and/or U.S. Mail to:

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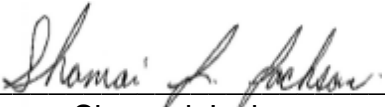
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