

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

SEP 21 2007

Susan K. Duffie Docket Room

In the Matter of a General Investigation to)
Determine Whether the Commission Should) Docket No. 08-GIMT-154-GIT
Require Eligible Telecommunications)
Carriers to Certify That They Have Used)
Kansas Universal Service Fund Support)
Appropriately.)

**COMMENTS OF THE
CITIZENS' UTILITY RATEPAYER BOARD**

COMES NOW the Citizens' Utility Ratepayer Board (CURB) and files the following comments in this docket in response to the Kansas Corporation Commission's (KCC or Commission) August 8, 2007, Order Opening Docket and Scheduling Initial Comments (Order Opening Docket). The Commission requests comments on several issues related to eligible telecommunications carriers (ETCs) certification and their use of Kansas Universal Service Fund (KUSF) support. In support of its position, CURB states and alleges as follows:

I. Introduction

1. In the Order Opening Docket, the Commission requests comments on various recommendations raised in Staff's Memorandum (Staff Memorandum) to the Commission.¹ The Commission seeks comments on the following issues:

- (a) The Commission's authority to require certification of use of KUSF support;
- (b) What investments and expenses should be included in an examination of use of KUSF support;

¹ Staff's Memorandum, dated June 28, 2007, was attached to the Commission's Order Opening Docket and incorporated as part of the Order.

- (c) What changes to the existing Federal Universal Service Fund (FUSF) forms will be necessary to achieve meaningful certification of KUSF support;²
- (d) What are the appropriate consequence(s) of failing to utilize KUSF support appropriately; and
- (e) Other comments that parties wish to make on areas they believe are pertinent but may not be covered by Staff's recommendations.

CURB will address all these issues in its Comments.

II. Certification of Use of KUSF Support is Necessary

2. The Commission's Order Opening Docket and the incorporated Staff Memorandum address prior proceedings related to FUSF and KUSF issues. In Docket No. 05-GIMT-112-GIT³ (Docket 112) the Commission requested comments regarding revision of the certification process previously established in Docket No. 01-GIMT-595-GIT (595 Docket). CURB's Initial and Reply Comments in Docket 112 recommended that carriers/ETCs sign a separate affidavit in order to certify that use of KUSF support are in compliance because these same carriers/ETCs were already required to sign forms certifying FUSF compliance.⁴ CURB stated that since state and federal universal service support funds are two separate funds, the ETC's current self-certification regarding federal funds is not adequate to safeguard and address compliance regarding state universal service funds.⁵ CURB noted that it would be best to have two separate certifications due to differences in definitions of universal service, calculation

² The current FUSF certification forms were attached to the Commission's Order Opening Docket.

³ Commission's April 13, 2005, Order Accepting Staff Report on the USF Certification Process and Scheduling Comments *In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996, and Non-Rural Carrier Certification of Urban/Rural Rate Comparability*.

⁴ CURB's Initial Comments at ¶ 10 and ¶ 11; CURB Reply Comments at ¶ 1.

⁵ CURB's Initial Comments at ¶ 10.

methods, and other different filing requirements between state and federal service funds.⁶ Finally, CURB stated that it should not be burdensome for ETC officers to sign a state self-certification form because they already sign a federal self-certification form.⁷

3. The Commission's final order in Docket 112 required carriers to certify that the amount of KUSF support received by the carrier is justified,⁸ but the Commission did not adopt CURB's proposal for a separate KUSF certification because it found the administrative costs would outweigh any benefits that such a form might bring (SWBT wire centers that received support were excluded from this required certification).⁹ Also, while it does not appear to be specifically mentioned in the Commission's Order, the Commission did not adopt CURB's proposal to require that "use" of KUSF support be certified.¹⁰ The certification of "use" of KUSF support is relevant, because this now appears to be the primary issue the Commission is addressing in this proceeding.

4. The Commission's decision in Docket 112 only required ETCs to certify that the amount of KUSF support received by the carrier was justified, but it now appears the primary issue in this proceeding is whether the carrier should certify that use of the KUSF support¹¹ is consistent with the Commission's current certification requirements for FUSF support as shown on Attachment 1 to the Commission's Order Opening Docket.¹²

⁶ CURB's Initial Comments at ¶ 11.

⁷ CURB's Initial Comments at ¶ 11.

⁸ Similar to what is currently required by the Federal Communications Commission (FCC) with respect to FUSF received under Section 254(e).

⁹ Commission's July 21, 2005 Order in Docket 112, at ¶ 3-5. The Commission noted that CURB, Staff, SWBT and United Telephone Company of Kansas d/b/a Sprint favored certification of KUSF support (although not all of these same parties favored the signing of a separate KUSF certification form).

¹⁰ CURB's Initial Comments at ¶ 10 state, "... CURB believes that an officer of an ETC should sign a self-certification affidavit to certify both "FUSF" and "KUSF" use of funds are in compliance." (emphasis added)

¹¹ Commission's Order Opening Docket and the incorporated Staff Memorandum, p. 3, notes the issue of certification of "use of this support."

¹² Attachment 1 is the form that Kansas ETCs must sign and provide to the Commission to certify that FUSF support is being "used" as intended by the FCC consistent with Section 254(c) of the Telecommunications Act.

5. It appears this issue has now come full circle, and CURB continues to support its original position in Docket 112 that a separate form is necessary to certify use of KUSF support because there are differences in definitions of universal service, calculation methods, and other different filing requirements between state and federal service funds. At the very minimum, ETCs should be required to certify use of KUSF support on the same form that certifies use of FUSF support, as shown on Attachment 1 to the Commission's Order Opening Docket.

6. CURB does not believe that signing a separate certification form regarding use of KUSF support is burdensome, because this merely requires one more signature. The benefits of certifying use of KUSF support far outweigh any incidental time it takes an officer to sign the certification form. The related benefits include, and are not limited to, those provisions set out in K.S.A. 66-2002(c) and (h) regarding preservation and enhancement of universal service, protecting the public safety and welfare, and ensuring the continued quality of telecommunications services and safeguarding the rights of consumers.

7. There is absolutely no practical, legal or other reason why FUSF support should be certified regarding its proper use, and KUSF support should not be certified regarding its proper use.

III. The Commission's Authority to Require Certification of Use of KUSF Support

8. CURB concurs with Staff's Memorandum¹³ that the Commission has broad authority to require certification under various Kansas Statutes, including: a) K.S.A. 66-1,188 which provides the Commission with the "... full power, authority and jurisdiction to supervise and control the telecommunications public utilities..." doing business in Kansas; b) K.S.A. 66-2002(c) which requires the Commission to adopt guidelines to ensure that carriers "preserve and

¹³ Staff Memorandum, p. 4.

enhance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services and safeguard the rights of consumers”; and c) K.S.A. 66-2002(h) which requires the Commission to establish the KUSF and “... make various determinations relating to the implementation of such fund.” In addition, the FCC has delegated responsibility to the states for oversight of Section 254(e) of the Federal Telecom Act (FTA) to ensure that carriers receiving FUSF support use this “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”¹⁴

IV. Plant Investments and Expenses Included in Examination of KUSF Support

9. Staff’s Memorandum raises issues regarding: a) whether the Commission’s existing FUSF certification forms sufficiently address investment and expenses to be reviewed for KUSF purposes; and b) whether a competitive ETC should be permitted to include some historical investment and expense incurred prior to receiving KUSF support because a carrier may have increased its investment in anticipation of receiving KUSF support in the future.¹⁵ CURB has recommendations regarding both of these issues.

10. Regarding issue (a) in the prior paragraph, CURB does not believe that the current FUSF certification forms adequately address investments and expenses to be reviewed for KUSF purposes. In addition to “regulated” costs that are shown on the current FUSF forms, CURB proposes that “non-regulated” costs should also be shown in order to prevent manipulation or

¹⁴ FCC’s *Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, FCC 01-157, rel. May 23, 2001*, ¶¶ 186, 187 (“[t]he Rural Task Force recommended that the Commission delegate to the states responsibility for oversight of section 254(e) in a manner similar to that used for non-rural carriers. We conclude that states should be required to file annual certifications with the Commission to ensure that carriers use universal service support only for the provision, maintenance and upgrading of facilities and services for which support is intended consistent with section 254(e). We conclude that the mandate in section 254(e) applies to all carriers, rural and non-rural, that are designated as eligible to receive support under 214(e) of the Act.”).

¹⁵ Staff Memorandum, p. 5. Also, Staff does not consider issue (b) to be relevant for incumbent ETCs because they have received either implicit or explicit support or both since they began investing in a network.

double-recovery of FUSF/KUSF support from year-to-year. This is the same recommendation that CURB made in its Comments in Docket 154,¹⁶ although the Commission did not adopt CURB's proposal. However, in Docket 154, the Commission also did not adopt CURB's recommendation to require certification of "use" of KUSF support. Since the Commission is revisiting that issue in this proceeding, it appears appropriate to reconsider CURB's recommendation for reporting "non-regulated" costs in FUSF/KUSF forms as well.

11. CURB believes that non-FUSF and non-KUSF costs, such as non-regulated costs, should be specifically shown on appropriate forms because: a) this allows a proper reconciliation of all costs to assist in the audit process; and b) costs can shift between the regulated or non-regulated classification from year-to-year, and reporting the non-FUSF/non-KUSF costs will assist the audit process and help eliminate any manipulation or double-recovery of costs from year-to-year. If non-FUSF/non-KUSF costs are not monitored by specific reporting as CURB recommends, this could result in abuses that overstate the amount of federal or state support funds that a carrier receives. Shifts between regulated and non-regulated costs are extremely difficult to monitor in the first place, and the absence of a specific reporting requirement will make it virtually impossible to track this shift of costs which impacts the FUSF and KUSF. For example, assume that an ETC invests in a significant amount of fiber in year 1 and claims that this will be used to provide universal "voice grade" service, and the ETC receives both federal and state universal service support based on this assumption for years 1 and 2. However, in year 3, assume the ETC leases 75% of its fiber assets to a non-regulated affiliate to provide digital television service and other broadband services that are not included in the state or federal definition of universal service. If the ETC did not identify this shift in plant use, it is possible that the ETC would continue to receive prior year levels of state and federal universal service

¹⁶ CURB's Initial Comments at ¶ 23 through ¶ 25.

support as if there was no change in the use of the plant. Furthermore, this situation is difficult to monitor or identify because the fiber assets leased to the affiliate are still recorded on the financial books of the ETC and would appear to be regulated telephone assets used by the ETC for universal service purposes. This situation could lead to overstating the amount of state and federal support paid to the ETC. Moreover, since DSL and digital television service are not subject to direct Commission regulation, it could be difficult to get ETCs to volunteer information or be forthcoming about changes in use of telephone plant. This supports CURB's recommendation for separate reporting.

12. Regarding issue (b) in paragraph 9, CURB supports Staff's Memorandum which suggests allowing plant investment and related expense amounts from the full year prior to a competitive ETC's certification request. This would appear to put competitive ETCs on equal footing with incumbent ETCs, because the competitive ETC may have incurred some plant investment and other costs in anticipation of receiving some KUSF support.

V. Other Necessary Changes to Existing Forms

13. Staff's Memorandum seeks input on whether changes in the existing forms utilized for FUSF certification are necessary to facilitate certification of the use of KUSF support.¹⁷ CURB believes that it is appropriate to have separate FUSF and KUSF certification forms. The current FUSF certification form makes reference to Federal Regulations. CURB believes the KUSF certification form should also refer to the same Federal Regulations, but also refer to K.S.A. 66-2002(c) which requires carriers to "preserve and enhance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services and safeguard the rights of consumers." The KUSF certification form should also

¹⁷ Staff Memorandum, pp. 5-6.

reference relevant decisions in Dockets 595, 112, and this proceeding (and any other applicable proceedings addressing KUSF policy). Finally, the separate FUSF and KUSF certification forms should be submitted to the Commission at the same time.

VI. Consequences of Failing to Utilize KUSF Support Appropriately

14. Staff's Memorandum seeks suggestions on the appropriate consequence(s) for ETCs that do not utilize KUSF support appropriately, and Staff states that the FCC has indicated that it could require a carrier to return support, withhold support, or recommend that a state revoke the carrier's ETC designation if support is used inappropriately.¹⁸ CURB believes that all of the previously noted consequences could be appropriate under various circumstances depending upon the level of harm to the KUSF.

15. In addition, CURB proposes other conditions and safeguards. At the very minimum, all ETCs should be put on notice that failure to utilize KUSF support appropriately will require: a) return of KUSF support that was used inappropriately (some KUSF support may have been used appropriately); and b) some payment of penalty, plus reimbursing the KUSF for the time value of money that was inappropriately disbursed to the ETC. In addition, the KUSF should withhold support until the non-compliant ETC can meet two requirements: 1) provide documentation and an independent audit¹⁹ indicating that it is using KUSF support appropriately; and 2) for a period of no less than three years, the ETC should be put on probation and required to provide evidence that it is "bonded" in the amount of future KUSF support it anticipates

¹⁸ Staff Memorandum, p. 6.

¹⁹ FCC Report and Order, released August 29, 2007, *In the Matter of Comprehensive Review of the Universal Service Fund Management, Administration, and Oversight in WC Docket No. 05-195, Federal-State Joint Board on Universal Service in CC Docket Nos. 96-45 and 02-6, Schools and Libraries Universal Service Support Mechanism in WC Docket No. 02-60, Rural Health Care Support Mechanism in WC Docket No. 03-109 and Lifeline and Link-Up in CC Docket No. 97-21*. The FCC recommends independent audits as a remedy to safeguard the FUSF, and; "to ensure program integrity and detect and deter waste, fraud, and abuse. Audits can reveal violations of the Act or the Commission's rules." ¶ 19. (FCC's Safeguard Order)

receiving for that three year period (and/or the KCC Staff should have some input regarding determination of a proper bonding level based on the ETC's previous KUSF support and forecasted support levels).²⁰ Finally, if during or after the three-year probation period there are other violations or problems, the Commission should revoke the carrier's ETC designation and terminate KUSF support.

16. With regard to an ETC's failure to properly utilize KUSF support, the Commission should consider adopting policies or practices similar to those addressed in the FCC's Report and Order released August 29, 2007, regarding actions to safeguard the FUSF from risk of waste, fraud and abuse.²¹ In this order, the FCC addresses rules requiring timely payments and assessing penalties or interest for late payments, which are partially intended to reimburse the FUSF for the time value of money.²² In addition, the FCC addresses preventative measures to detect and deter waste, fraud and abuse -- such as independent audits.²³ Finally, the FCC addresses specific rules and criteria for instances in which a FUSF beneficiary may not have used funds in accordance with program procedures (the "beneficiaries" that the FCC addresses includes schools, libraries, service providers, consultants, and others).²⁴

VII. Other Issues

17. The Commission's Order Opening Docket allows parties to make other comments that they believe are relevant but may not be covered by Staff's recommendations. CURB has no further comments at this time.

²⁰ The existence of a "bond" held by an external party will ensure that the KUSF is reimbursed in case of future wrongdoing of the ETC.

²¹ FCC's Safeguard Order, ¶ 9 through ¶ 33.

²² *Id.*, ¶ 9 through ¶ 18.

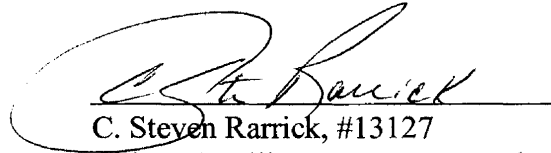
²³ *Id.*, ¶ 19 through ¶ 21.

²⁴ *Id.*, ¶ 30 through ¶ 33.

VIII. Conclusion

18. CURB appreciates the opportunity provided in this docket to submit these comments on behalf of Kansas small business and residential ratepayers regarding the importance of certification and other requirements for ETCs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Steven Rarrick", is written over a horizontal line. The signature is fluid and cursive.

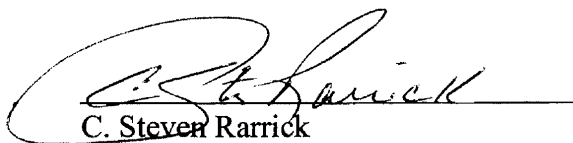
C. Steven Rarrick, #13127
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Tel: (785) 271-3200
Fax: (785) 271-3116

VERIFICATION


STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

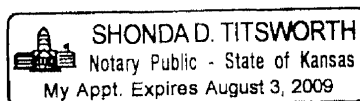
That he is an attorney for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 21st day of September, 2007.


Notary of Public

My Commission expires:



CERTIFICATE OF SERVICE

08-GIMT-154-GIT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 21st day of September, 2007, to the following:

JAMES T. MEISTER
ALLTEL KANSAS LIMITED PARTNERSHIP
ONE ALLIED DRIVE
MAIL STOP 1269-B5F11-C
P O BOX 2177
LITTLE ROCK, AR 72202-2177
Fax: 501-905-5679

TERRY O'NEIL, MANAGER
BLUE VALLEY TELE-COMMUNICATIONS, INC.
1557 PONY EXPRESS HIGHWAY
PO BOX 82A
HOME, KS 66438
Fax: 785-799-3530
toneil@bluevalley.net

JACK KUHLMANN, PRESIDENT & GENERAL MANAGER
BLUESTEM TELEPHONE COMPANY, INC.
P O BOX 199
908 FRONTVIEW
DODGE CITY, KS 67801-0199

DEBI A. LONG, CONTROLLER
CASS COUNTY TELEPHONE COMPANY
PO BOX 398
PECULIAR, MO 64078
Fax: 816-758-6707

MICHAEL A. PIERCE, WIRELESS MANAGER
CELLULAR NETWORK PARTNERSHIP
D/B/A PIONEER CELLULAR
108 EAST ROBERTS
KINGFISHER, OK 73750-2742
Fax: 405-375-0782
nekretchmar@ptci.com

JIM DAHMEN, MANAGER
COLUMBUS TELEPHONE CO. INC.
224 SOUTH KANSAS AVENUE
COLUMBUS, KS 66725
Fax: 620-429-1704

DALE JONES, GENERAL MANAGER
COUNCIL GROVE TELEPHONE COMPANY
PO BOX 259
1568 S 1000 ROAD
COUNCIL GROVE, KS 66846
Fax: 316-767-5199
djones@tctelco.net

JERRY JAMES, GENERAL MANAGER
CRAW-KAN TELEPHONE COOPERATIVE, INC.
200 N. OZARK
P.O. BOX 100
GIRARD, KS 66743
Fax: 620-724-4099
james@ckt.net

DAVID CUNNINGHAM, PRESIDENT & GENERAL MANAGER
CUNNINGHAM TELEPHONE COMPANY, INC.
220 W MAIN
PO BOX 108
GLEN ELDER, KS 67446
Fax: 785-545-3277

ROBERT BOALDIN, PRESIDENT & GENERAL MANAGER
ELKHART TELEPHONE COMPANY, INC.
610 SOUTH COSMOS
PO BOX 817
ELKHART, KS 67950
Fax: 620-697-4262
bboaldin@epictouch.com

TRENT BOALDIN, PRESIDENT
EPIC TOUCH CO.
610 S. COSMOS
P.O. BOX 1260
ELKHART, KS 67950-1260
Fax: 620-697-9997
td@elkhart.com

THOMAS E GLEASON, ATTORNEY
GLEASON & DOTY CHTD
PO BOX 6
LAWRENCE, KS 66044-0006
Fax: 785-856-6800
gleason@sunflower.com

CERTIFICATE OF SERVICE

08-GIMT-154-GIT

GERALD WASHBURN, GENERAL MANAGER
GOLDEN BELT TELEPHONE ASSOCIATION.
103 LINCOLN ST
PO BOX 229
RUSH CENTER, KS 67575
Fax: 785-372-4210

ROBERT A. KOCH, PRESIDENT/GEN MGR
H&B CABLE SERVICE, INC.
108 NORTH MAIN
PO BOX 108
HOLYROOD, KS 67450
Fax: 785-252-3229
robkoch@hbcomm.net

MARK WADE, PRESIDENT/GEN MANAGER
HAVILAND TELEPHONE COMPANY, INC.
PO BOX 308
106 NORTH MAIN
HAVILAND, KS 67059
Fax: 620-862-7299
mark@havilandtelco.com

GENE MORRIS, PRESIDENT/GENERAL MGR.
J.B.N. TELEPHONE COMPANY, INC.
418 WEST 5TH ST., SUITE A
HOLTON, KS 66436
Fax: 785-866-4121

MARK E. CAPLINGER, ATTORNEY
JAMES M. CAPLINGER, CHARTERED
823 W 10TH STREET
TOPEKA, KS 66612
Fax: 232-0724
mark@caplinger.net

GREG ALDRIDGE, CEO/GENERAL MANAGER
KANOKLA TELEPHONE ASSN., INC.
PO BOX 111
100 KANOKLA AVENUE
CALDWELL, KS 67022
Fax: 620-845-5636

MICHAEL J MURPHY, PRESIDENT & MANAGER
GORHAM TELEPHONE COMPANY
105 MARKET
PO BOX 235
GORHAM, KS 67640
Fax: 785-637-5590

ROBERT A KOCH, PRESIDENT/GEN MGR
H&B COMMUNICATIONS, INC.
108 NORTH MAIN
PO BOX 108
HOLYROOD, KS 67450
Fax: 785-252-3229

CARLA SHEARER, PRESIDENT
HOME TELEPHONE COMPANY, INC.
BOX 8
211 SOUTH MAIN
GALVA, KS 67443
Fax: 620-654-3122
carla@hometelephone.com

JAMES M. CAPLINGER, ATTORNEY
JAMES M. CAPLINGER, CHARTERED
823 W 10TH STREET
TOPEKA, KS 66612
Fax: 232-0724
jim@caplinger.net

JAMES M. CAPLINGER, JR., ATTORNEY
JAMES M. CAPLINGER, CHARTERED
823 W 10TH STREET
TOPEKA, KS 66612
Fax: 785-232-0724
jrcaplinger@caplinger.net

COLLEEN HARRELL, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
c.harrell@kcc.ks.gov
**** Hand Deliver ****

CERTIFICATE OF SERVICE

08-GIMT-154-GIT

PATRICK T SMITH, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3167
p.smith@kcc.ks.gov
**** Hand Deliver ****

HARRY J LEE JR, PRESIDENT/GENERAL MANAGER
LAHARPE TELEPHONE COMPANY, INC.
D/B/A LAHARPE LONG DISTANCE
109 W. 6TH STREET
PO BOX 100
LA HARPE, KS 66751

SHERRY L. DEWITT, PRESIDENT
MADISON TELEPHONE LLC
117 NORTH THIRD
PO BOX 337
MADISON, KS 66860-0337
Fax: 620-437-2108

JANE PRETTYMAN, GENERAL MANAGER
MO-KAN DIAL, INC.
PO BOX 429
LOUISBURG, KS 66053-0429
Fax: 913-837-5108
jkp@townes.net

HARRY M WHEELBOG, VICE PRESIDENT
MOUNDRIDGE TELEPHONE COMPANY
109 NORTH CHRISTIAN AVENUE
BOX 960
MOUNDRIDGE, KS 67107
Fax: 620-345-6106

FRANK CARLTON, PRESIDENT
MUTUAL TELEPHONE COMPANY
PO BOX 338
LITTLE RIVER, KS 67457
Fax: 620-897-6211

JEFF WICK
NEX-TECH WIRELESS, L.L.C
2418 VINE STREET
HAYS, KS 67601
Fax: 785-265-4479
jwick@nex-tech.com

LARRY SEIVER, GENERAL MANAGER
NEX-TECH, INC.
2418 VINE STREET
PO BOX 339
HAYS, KS 67601
Fax: 785-625-4479

KATHY FAIRCLOTH, GENERAL MANAGER
PEOPLES TELECOMMUNICATIONS, LLC
208 N BROADWAY
P O BOX 450
LA CYGNE, KS 66040
kathyf@peoplestelecom.net

RICHARD K. VEACH, CEO/GENERAL MANAGER
PIONEER TELEPHONE ASSN., INC.
D/B/A PIONEER COMMUNICATIONS
120 N. BAUGHMAN
PO BOX 707
ULYSSES, KS 67880
Fax: 620-424-3109
dick@pioncomm.net

JAMES LEDNICKY, GENERAL MANAGER
RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
7TH AND MAIN
PO BOX 147
EVEREST, KS 66424
Fax: 785-548-7517

ELIZABETH L. KOHLER, VICE PRESIDENT OF LEGAL
SERVICES
RCC MINNESOTA, INC.
302 MOUNTAIN VIEW DRIVE
SUITE 200
COLCHESTER, VT 05446
Fax: 802-655-3214
bethlk@rccw.com

CERTIFICATE OF SERVICE

08-GIMT-154-GIT

LARRY E SEVIER, CEO/GENERAL MGR
RURAL TELEPHONE SERVICE COMPANY, INC.
145 N MAIN
P O BOX 158
LENORA, KS 67645
Fax: 785-567-4401
larrys@ruraltel.com

STEVE RICHARDS, GENERAL MANAGER
S&T TELEPHONE COOPERATIVE ASSOCIATION, INC.
320 KANSAS AVENUE
PO BOX 99
BREWSTER, KS 67732
Fax: 785-694-2750

STEPHEN W. DAVIS, GENERAL MANAGER
SOUTH CENTRAL TELEPHONE ASSN. INC.
101 S. MAIN
PO DRAWER B
MEDICINE LODGE, KS 67104
Fax: 620-930-1050
sdavis@sctelcom.com

CYNDI GALLAGHER, DIRECTOR-REGULATORY
SOUTHWESTERN BELL TELEPHONE CO.
220 EAST SIXTH STREET, RM. 500
TOPEKA, KS 66603
Fax: 785-276-1988
cg6985@att.com

MELANIE N MCINTYRE, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO.
ROOM 515
220 E SIXTH
TOPEKA, KS 66603
Fax: 785-276-1948
ms3765@att.com

SUSAN SHERWOOD
SPRINT SPECTRUM
6500 SPRINT PARKWAY
MS:HL-5ASTX
OVERLAND PARK, KS 66251

JANET BATHURST, GENERAL MANAGER
S&A TELEPHONE COMPANY, INC.
413 MAIN STREET
PO BOX 68
ALLEN, KS 66833
Fax: 620-528-3226
jbathurst@satelephone.com

ROBERT W MCCAUSLAND, VICE PRESIDENT
REGULATORY AFFAIRS
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SOUTH
SUITE 100
ALLEN, TX 75013-2789
Fax: 214-495-4790
rmccausland@sagetelecom.net

KENDALL S. MIKESELL, PRESIDENT
SOUTHERN KANSAS TELEPHONE COMPANY, INC.
112 SOUTH LEE STREET
PO BOX 800
CLEARWATER, KS 67026-0800
Fax: 620-584-2268

JEFFREY E LEWIS, GENERAL COUNSEL
SOUTHWESTERN BELL TELEPHONE CO.
ROOM 515
220 E SIXTH
TOPEKA, KS 66603
Fax: 785-276-1948
jeffrey.e.lewis@att.com

BRUCE A NEY, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO.
ROOM 515
220 E SIXTH
TOPEKA, KS 66603
Fax: 785-276-1948
bruce.ney@att.com

JACK KUHLMANN, DIRECTOR OF OPERATIONS
SUNFLOWER TELEPHONE COMPANY, INC.
D/B/A FAIRPOINT COMMUNICATIONS
P O BOX 199
DODGE CITY, KS 67801-0199
Fax: 620-227-8576

CERTIFICATE OF SERVICE

08-GIMT-154-GIT

MARK M. GAILEY, PRESIDENT & GENERAL MANAGER
TOTAH COMMUNICATIONS, INC.
101 MAIN STREET
PO BOX 300
OCHELATA, OK 74051-0300
Fax: 918-535-2701

DALE JONES, GENERAL MANAGER
TRI-COUNTY TELEPHONE ASSOCIATION, INC.
1568 S 1000 ROAD
PO BOX 299
COUNCIL GROVE, KS 66846
Fax: 785-366-7007
djones@tctelco.net

MICHAEL J FOSTER, PRESIDENT/GENERAL MANAGER
TWIN VALLEY TELEPHONE, INC.
D/B/A CABLE COMPANY D.B.A IS TWIN VALLEY
COMMUNICATIONS CO.
22 SPRUCE
MILTONVALE, KS 67466
Fax: 785-427-2216
mike.foster@tvtnet.net

CRAIG MOCK, GENERAL MANAGER
UNITED TELEPHONE ASSN., INC.
1107 MCARTOR RD
PO BOX 117
DODGE CITY, KS 67801
Fax: 620-227-7032

DON HOWELL, PRESIDENT
UNITED WIRELESS COMMUNICATIONS, INC.
1107 MCARTOR ROAD
DODGE CITY, KS 67801

GRANT SPELLMEIER, DIRECTOR, EXTERNAL AFFAIRS
USCOC OF NEBRASKA/KANSAS LLC
8410 BRYN MAWR
CHICAGO, IL 60631
Fax: 8478643133

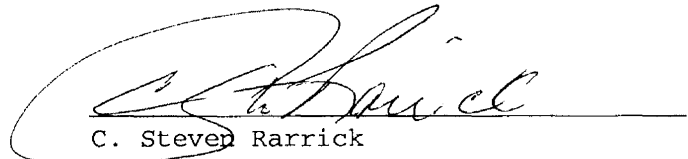
STEVEN L SACKRIDER, PRESIDENT/GEN MGR
WAMEGO TELECOMMUNICATIONS COMPANY, INC.
1009 LINCOLN
PO BOX 25
WAMEGO, KS 66547-0025
Fax: 785-456-9903
steve.sackrider@wamtelco.com

ARCHIE MACIAS, GENERAL MANAGER
WHEAT STATE TELEPHONE COMPANY, INC.
PO BOX 320
106 W FIRST STREET
UDALL, KS 67146
Fax: 620-782-3302
agmacias@wheatstate.com

BRIAN BOISVERT, GENERAL MANAGER
WILSON TELEPHONE COMPANY, INC.
2504 AVENUE D
BOX 190
WILSON, KS 67490-0190
Fax: 785-658-3344

JEFFREY PFAFF, REGULATORY AFFAIRS, LEGAL DEP'
WIRELESS CO., LP
D/B/A SPRINT PCS
KSOPHIO414
6160 SPRINT PARKWAY 4TH FLOOR
OVERLAND PARK, KS 66251
jeff.m.pfaff@sprint.com

BRENDA DIXON, VP/GENERAL MANAGER
ZENDA TELEPHONE COMPANY, INC.
208 NORTH MAIN
PO BOX 128
ZENDA, KS 67159
Fax: 620-243-7611


C. Steven Rarrick