



May 1, 2017

Ms. Amy Green
Secretary of the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

RE: Docket No. 16-GIMT-511-GIT
CenturyLink's Updated Compliance Filing on CAF II and KUSF Support

Dear Ms. Green:

In its May 24, 2016 Opening Order, the Commission directed CenturyLink in Ordering Paragraph A to file (A) its proposed model, (B) its revised CAF II support, (C) the 2015 enabled locations reported to the FCC, and (D) its preliminary 2016 enabled data by July 1, 2016. CenturyLink made the required compliance filing on June 30, 2016 and labeled the individual elements of its filing as Attachment A, B, C and D, respectively. On August 16, 2016, after ongoing discussions with Staff, CenturyLink filed with the Commission a slightly revised Attachment A and Attachment B.

On August 22, 2016, Staff filed its Report and Recommendation which recommended the Commission (1) adopt CenturyLink's August 16, 2016 model, (2) adopt true-ups and adjustments proposed by Staff and (3) adopt a bi-annual CAF II and KUSF support true-up process. The Commission accepted Staff's recommendation in an Order dated October 10, 2016 and further directed CenturyLink to file in the aforementioned Docket an updated CAF II model, reflecting 2016 enabled locations and preliminary 2017 enabled locations, and CAF II support offset by May 1, 2017.

Pursuant to the Commission's October 10, 2016 Order, CenturyLink makes this filing which includes the following attachments:

- Attachment A – CenturyLink's revised proposed model to reflect 2016 and revised 2015 CAF II enabled locations. Pursuant to obligations associated with the FCC's CAF II initiative, CenturyLink is to provide a detailed listing of enabled locations to the FCC by March 1 of the following year. This FCC listing was also intended to be the basis for the CAF II offset for KUSF support calculations; however, for 2017 the report due date was delayed till July 1, the report has not yet been filed at the federal level. Nonetheless, the KUSF support model was modified to reflect 2016 enabled locations using the yet-to-be-filed FCC report as the basis.

It should also be noted that the "adjustment location factor" proposed by CenturyLink and approved by the Commission in its October 10, 2016 Order (Para. 8) has been removed

from the model for the 2016 enabled census blocks as further directed by the Commission in its Order (Para. 9).

The United Telephone Companies of Kansas d/b/a CenturyLink considers Attachment A to be confidential and of commercial value, and it has not been made public. The file also contains location data which could be valuable to a competitor in evaluating or formulating different strategies for the Kansas market. This document is filed pursuant to K.S.A. 66-1220a, and CenturyLink asks the Commission to treat this document as confidential and exempt from public disclosure under that statute. A redacted copy has been filed publically.

- Attachment B – CenturyLink's revised KUSF Support. CenturyLink's revised KUSF support figure is the result of the model in Attachment A. The revised KUSF support amount differs by \$38,313 (or \$3,193 monthly) from the previous model as a result of 2016 enabled locations. CenturyLink considers Attachment B to be public data.
- Attachment C – Detailed location data for the 2016 and revised 2015 CAF II enabled locations. The basis for Attachment C is the FCC report which will be filed with USAC no later than July 1, 2017. Attachment C contains additional location details such as address in addition to longitude and latitude, of enabled locations to assist Staff in their efforts.

Please note that the United Telephone Companies of Kansas d/b/a CenturyLink considers Attachment C to be confidential and of commercial value, and it has not been made public. The file also contains customer-specific location data and location data of other enabled households which could be valuable to a competitor in evaluating or formulating different strategies for the Kansas market. This document is filed pursuant to K.S.A. 66-1220a, and CenturyLink asks the Commission to treat this document as confidential and exempt from public disclosure under that statute.

- Attachment D – 2017 Preliminary Enabled Location Data. Preliminary 2017 enabled location data was deemed too speculative to incorporate into the May 1st model (Attachment A). CenturyLink is upgrading its broadband infrastructure based upon facility "nodes" and these nodes serve areas that differ from census blocks. As such, model impacts cannot be completed until the entire area is finalized and CenturyLink physically verifies the results of its contractors. Attachment D contains the current 2017 **anticipated** construction plan. Once an area is fully constructed and verification procedures as well as customer specific location data (including address and longitude/latitude) has been determined, CenturyLink will be in a position to update the model. Future bi-annual model updates should capture any needed true-ups although any true-up is anticipated to be minor and possibly in CenturyLink's favor as outlined in Attachment B, above.

Again, CenturyLink considers Attachment D to be confidential and of commercial value, and it has not been made public. The file contains specific location data of anticipated infrastructure improvements which could be valuable to a competitor in evaluating or formulating strategies for the Kansas market. This document is filed pursuant to K.S.A. 66-1220a, and CenturyLink asks the Commission to treat this document as confidential and exempt from public disclosure under that statute.

Finally, as directed by the Commission in its Order dated October 10, 2016, (Para. 11), CenturyLink and Staff continue their on-going cooperative efforts to identify and resolve any potential location discrepancies. While these isolated location discrepancies are common in the industry and could potentially impact the amount of KUSF support, this verification initiative is unrelated to the CAF program or the CAF offset.

If you have any questions concerning this matter, please contact me.

Yours appreciatively,

A handwritten signature in black ink, appearing to read "John Idoux". The signature is fluid and cursive, with the first name "John" and last name "Idoux" clearly distinguishable.

John R. Idoux
Kansas Governmental Affairs Director
600 New Century Parkway
New Century, KS 66031
913-353-7085 john.idoux@centurylink.com

Docket No. 16-GIMT-511-GIT
CenturyLink's Compliance Filing on CAF II and KUSF Support

SUBMITTED PURSUANT TO
K.S.A. 66-1220A

United Telephone Companies of Kansas
d/b/a/ CenturyLink

Attachment A
KUSF/CAF Model – See Separate Excel File

This Attachment contains confidential and of commercial value, and it has not been made public
as described in the cover letter

CONFIDENTIAL AND PROPRIETARY

Company: CenturyLink of Kansas

As of September 30, 2016						
Wire Center	ZONE 1			ZONE 2		
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
	Lines	(Monthly)	(Annual)	Supported Lines	(Monthly)	(Annual)
Alta Vista	\$	18.19		\$	100.01	
Altoona	\$	21.80		\$	91.96	
Belle Plaine	\$	-		\$	31.13	
Benedict	\$	-		\$	117.03	
Blue Mound	\$	40.47		\$	114.80	
Bucyrus	\$	-		\$	39.07	
Buffalo	\$	-		\$	70.97	
Centropolis	\$	-		\$	69.73	
Circleville	\$	34.46		\$	90.67	
Conway	\$	-		\$	98.49	
Coyville	\$	-		\$	88.71	
Delia	\$	-		\$	84.53	
Denison	\$	29.99		\$	84.00	
Durham	\$	-		\$	103.19	
Easton	\$	7.74		\$	43.71	
Edgerton	\$	-		\$	21.98	
Effingham	\$	4.01		\$	59.56	
Emmett	\$	39.17		\$	93.49	
Fall River	\$	-		\$	68.10	
Fontana	\$	-		\$	47.58	
Gardner	\$	-		\$	3.08	
Greeley	\$	8.04		\$	66.26	
Gridley	\$	14.80		\$	109.86	
Harveyville	\$	24.75		\$	82.47	
Hesston	\$	-		\$	17.30	
Hoyt	\$	5.81		\$	45.96	
Innman	\$	-		\$	42.76	
Lafontaine	\$	-		\$	125.45	
Lancaster	\$	4.09		\$	51.05	
Lane	\$	-		\$	32.96	
Lebo	\$	2.99		\$	77.37	
Lehigh	\$	41.68		\$	117.10	
Le Roy	\$	17.48		\$	111.73	
Linwood	\$	8.12		\$	29.30	
Mapleton	\$	-		\$	93.54	
Mayetta	\$	16.87		\$	51.20	
Mc Louth	\$	3.77		\$	50.21	
Meriden	\$	1.17		\$	28.18	
Michigan Valley	\$	-		\$	86.39	
Mound City	\$	1.71		\$	53.47	
Neosho Falls	\$	-		\$	93.55	
Nortonville	\$	5.83		\$	57.07	
Osage City	\$	-		\$	37.89	
Overbrook	\$	1.30		\$	54.24	
Oxford	\$	-		\$	49.26	
Ozawkie	\$	7.56		\$	38.45	
Parker	\$	12.16		\$	67.36	
Perry	\$	0.15		\$	36.68	
Piqua	\$	-		\$	117.23	
Princeton	\$	8.28		\$	67.05	
Quincy	\$	-		\$	243.23	
Richmond	\$	9.84		\$	69.69	
Rossville	\$	-		\$	45.52	
Silver Lake	\$	-		\$	27.20	
Spring Hill	\$	0.41		\$	21.46	
Saint Marys	\$	-		\$	15.95	
Thayer	\$	11.90		\$	75.96	
Toronto	\$	14.09		\$	80.33	
Walton	\$	12.47		\$	70.57	
Wellsville	\$	-		\$	41.21	
Winchester	\$	1.11		\$	60.84	
Windom	\$	-		\$	60.58	
Abbyville	\$	-		\$	59.22	
Alden	\$	27.44		\$	45.06	
Arlington	\$	10.55		\$	71.51	
Belpre	\$	-		\$	72.04	
Clafin	\$	6.34		\$	75.04	
Cunningham	\$	15.68		\$	109.55	
Hoisington	\$	-		\$	49.76	
Hudson	\$	-		\$	57.73	
Langdon	\$	-		\$	67.61	
Macksville	\$	-		\$	43.76	





KUSF / CAF2 Overlap																				
Zone 1								Zone 2								Zone1 KUSF Reduction	Zone 2 KUSF Reduction	Total KUSF Reduction		
Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2	Total KUSF Needed in WC after CAF2 Overlap	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2	Total KUSF Needed in WC after CAF2 Overlap					

Company: CenturyLink of Kansas

Wire Center	As of September 30, 2016						KUSF / CAF2 Overlap													Zone1 KUSF Reduction	Zone 2 KUSF Reduction	Total KUSF Reduction	
	ZONE 1			ZONE 2			Zone 1							Zone 2									
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2	Total KUSF Needed in WC after CAF2 Overlap	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB				KUSF in nonCAF2 Areas
Murdock		\$ -			\$ 92.68																		
Partridge		\$ 13.29			\$ 64.25																		
Preston		\$ -			\$ 87.12																		
Pretty Prairie		\$ 9.13			\$ 70.83																		
Saint John		\$ 0.42			\$ 73.11																		
Sterling		\$ -			\$ 33.26																		
Sylvia		\$ -			\$ 48.80																		
Riverton		\$ 5.38			\$ 36.70																		
Scammon		\$ 2.06			\$ 28.18																		
Alma		\$ -			\$ 63.41																		
Altamont		\$ 0.82			\$ 57.60																		
Baldwin		\$ -			\$ 20.81																		
Buhler		\$ -			\$ 26.31																		
Burlingame		\$ -			\$ 27.66																		
Burlington		\$ -			\$ 32.11																		
Burrton		\$ 9.41			\$ 82.62																		
Ellinwood		\$ -			\$ 37.54																		
Eskridge		\$ -			\$ 95.25																		
Fredonia		\$ -			\$ 4.78																		
Garnett		\$ -			\$ 21.33																		
Haven		\$ -			\$ 9.16																		
Highland		\$ -			\$ 21.49																		
Hillsboro		\$ -			\$ 13.26																		
Kincaid		\$ -			\$ 54.52																		
Lyndon		\$ -			\$ 28.81																		
Melvorn		\$ -			\$ 60.74																		
Moran		\$ 7.46			\$ 72.61																		
Morrill		\$ -			\$ 36.76																		
Mound Valley		\$ 15.01			\$ 78.78																		
Oskaloosa		\$ -			\$ 26.07																		
Oswego		\$ -			\$ 24.81																		
Pomona		\$ -			\$ 28.28																		
Powhattan		\$ -			\$ 51.81																		
Quenemo		\$ -			\$ 111.32																		
Troy		\$ -			\$ 45.65																		
Valley Falls		\$ -			\$ 26.42																		
Wathena		\$ 2.68			\$ 45.16																		
Waverly		\$ 1.12			\$ 84.23																		
Westphalia		\$ -			\$ 75.84																		
White Cloud		\$ 14.45			\$ 69.22																		
Subtotal																							
Total Company																							
																					\$ 3,217,510		

\$ (12,822,602)

Calculation of CenturyLink's Revised KUSF Year#21 Support Amount Resulting From Changed Federal Offset

	Year21 Approved (1)		Year21 Revised Proposal (2)	Difference
Gross High Cost	\$ 12,307,877		\$ 12,307,877	\$ -
Federal Offset	\$ (3,255,823)	<i>from model</i>	\$ (3,217,510)	\$ 38,313
NET HIGH COST	\$ 9,052,054		\$ 9,090,367	\$ 38,313
Gross Access	\$ 1,108,691		\$ 1,108,691	\$ -
Access True up	\$ (205,946)		\$ (205,946)	\$ -
NET ACCESS	\$ 902,745		\$ 902,745	\$ -
KUSF Year20 Adjustment	\$ (16,118)		\$ (16,118)	\$ -
Qualifying KUSF	\$ 9,938,681		\$ 9,976,994	\$ 38,313
Cap	\$ 11,400,000		\$ 11,400,000	
Total KUSF	\$ 9,938,681		\$ 9,976,994	\$ 38,313

Notes:

(1) Year21 approved amounts from Docket No. 17-GIMT-008-GIT for 6 months until revised model available
Amounts taken from Attachment B pages 1 and 5 from Reams's Direct Testimony filed 12/15/2016

(2) KCC Order in Dkt No. 16-511 dated Oct 10, 2016 directed CenturyLink to file its revised KUSF support amount on May 1, 2017
Federal offset amount taken from AI-119 from May 1st KUSF/CAF Model summary page

Docket No. 16-GIMT-511-GIT
CenturyLink's Compliance Filing on CAF II and KUSF Support

SUBMITTED PURSUANT TO
K.S.A. 66-1220A

United Telephone Companies of Kansas
d/b/a/ CenturyLink

Attachment C
2016 Enabled Household Locations With Detailed Information

This Attachment contains confidential and of commercial value, and it has not been made public
as described in the cover letter

CONFIDENTIAL AND PROPRIETARY

Docket No. 16-GIMT-511-GIT
CenturyLink's Compliance Filing on CAF II and KUSF Support

SUBMITTED PURSUANT TO
K.S.A. 66-1220A

United Telephone Companies of Kansas
d/b/a/ CenturyLink

Attachment D
2017 Preliminary Enabled Locations

This Attachment contains confidential and of commercial value, and it has not been made public
as described in the cover letter

CONFIDENTIAL AND PROPRIETARY