

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

In the Matter of an Investigation to Determine)
the Annual Assessment Rate for the Twenty-Ninth)
Year of the Kansas Universal Service Fund,)
Effective March 1, 2025)

Docket No. 25-GIMT-141-GIT

PUBLIC
DIRECT TESTIMONY
OF
STEVE GARRETT
ON
BEHALF OF THE
KANSAS CORPORATION COMMISSION STAFF

December 9, 2024

1 **Q. Please state your name and business address.**

2 A. My name is Steve Garrett. My business address is: Kansas Corporation Commission
3 (Commission), 1500 S.W. Arrowhead Road, Topeka, Kansas 66604.

4 **Q. What is your position at the Commission?**

5 A. I am employed by the Kansas Corporation Commission (KCC or Commission) as the
6 Deputy Chief of Telecommunications. I became employed by the Commission in July
7 2022 as a Senior Telecommunications Analyst. I was promoted to my current position in
8 October 2023.

9 **Q. What is your educational background and professional experience?**

10 A. I received a Bachelor of Business Administration in Finance from Washburn University,
11 Topeka, Kansas. During my employment with the Commission, I have attended various
12 regulatory and telecommunications related courses. I am a member of the National
13 Association of Regulatory Utility Commissioners' (NARUC) Staff Subcommittee on
14 State Universal Service Fund Administrators Subcommittee since January 2023 and have
15 been a member since 2022. I worked at the Kansas Department of Transportation
16 (KDOT) prior to beginning employment at the Commission. I began employment with
17 KDOT in April 2008 as an Accountant I, then promoted to Accountant II in January 2011,
18 then promoted to Accountant III in November 2013 and lastly promoted to an Accountant
19 IV in December 2015.

20 **Q. Have you previously testified before the Commission?**

21 A. Yes. I have filed testimony before the Commission in Docket No. 24-GIMT-229-GIT.

22 **Q. Please provide a brief background of this Docket.**

1 A. On September 17, 2024, the Commission issued its *Order Opening Docket; Protective*
2 *Order Applicable to CURB; Requiring Entries of Appearance and Establishing Procedural*
3 *Schedule* (Opening Order) to determine the affordable residential and single-line business
4 rates for local service provided by the rural rate-of-return regulated local exchange carriers
5 (RLECs) pursuant to K.S.A. 66-2005(e) and the KUSF assessment rate for the twenty-
6 nineth Fiscal Year of the KUSF, effective March 1, 2025, through February 28, 2026 (FY
7 29).

8 The Commission directed the RLECs and the Brightspeed Companies of Kansas, Inc.
9 (Brightspeed)¹ to file access line data, preliminary annual KUSF support calculations,
10 intrastate access data, and supporting documentation in this Docket on or before October
11 14, 2024. The Commission also directed Brightspeed to file its preliminary KUSF
12 support calculations, intrastate access data, and supporting documentation in this Docket
13 on or before October 14, 2024. All companies were directed to provide an electronic
14 copy of their data to Staff on or before October 14, 2024. Staff was subsequently directed
15 to file direct testimony and its calculations supporting the new affordable rates for the
16 RLECs and its proposed KUSF FY 29 assessment rate by December 13, 2024.

17 **I. Testimony Summary**

18 **Q. Please summarize your testimony and recommendations.**

19 A. My testimony and attached documentation support Staff's recommendation for the
20 Commission to issue an order to adopt a residential affordable rate of \$19.00, an

¹ Brightspeed Companies of Kansas include: Brightspeed of Western Missouri, LLC; Brightspeed of Kansas, Inc.; Brightspeed of Eastern Kansas, Inc.; and Brightspeed of Southern Kansas, Inc.

1 affordable single-line business rate of \$22.00, and an 12.15% assessment rate for KUSF
2 FY 29.

3 **Q. Please identify the supporting documentation filed with your testimony.**

4 A. My written testimony is public, however, Exhibit STG-1, page 2, Attachment B, and
5 Attachments G - L contain company-specific data and are deemed confidential.
6 Therefore, I am filing both redacted and confidential copies of Exhibit STG-1 and my
7 Attachments. Exhibit STG-1 summarizes Staff's calculation of the KUSF FY 29
8 assessment rate and Attachments A – L include documentation to support my calculations.
9 Exhibit 1 includes Staff's calculations of the affordable rates for the RLECs. I note that
10 confidential data is available only to each specific company and the Citizens' Utility
11 Ratepayer Board (CURB).²

12 **Q. What should a party do if it becomes aware of a Staff computational error?**

13 A. The Opening Order directs any party that becomes aware of a computational error to notify
14 Staff as soon as possible in order to allow Staff time to determine if the error has a material
15 effect to its calculations and, if necessary, to file revised calculations.³

16 **Q. Is there other information regarding your testimony you wish to explain?**

17 A. Yes. Rounding differences may exist within my testimony and calculations. Additionally,
18 my testimony and calculations recognize the KUSF operates one month in arrears, meaning

² Opening Order, ¶ 13-16. See also *Order: (1) Granting CMT Partners Petition for Reconsideration and/or Clarification to the Extent that the Protective Order Issued in This Docket is Amended; (2) Granting CURB's Petition for Reconsideration and/or Clarification to the Extent that the Commission Clarifies its Intent for CURB to Have Access to Same Information as Staff; and (3) Granting Staff's Motion for Clarification and Clarifies its Intent on the Auditing Procedures and the Future Calculation of the Assessment Rate*, ¶¶12 - 17, Docket No. 94-GIMT-478-GIT (Docket 94-478), Dec. 11, 1998.

³ Opening Order, Ordering ¶ H.

1 the revenue earned in a given month is not reported until the next month. The same holds
2 true for the related assessment contributions that are paid to the KUSF. Because the
3 revenue reporting and assessment contributions are one month in arrears, KUSF payments
4 to companies and programs are disbursed on or before the first of the next calendar month.
5 For example, carriers were required to report their March 2024 revenues and pay the related
6 assessments to the KUSF by April 15, 2024. The March 2024 KUSF support
7 disbursements to companies and programs were then paid by May 1, 2024. Additionally,
8 Company-specific data and calculations were discussed with the RLECs and/or their
9 consultants, as necessary.

10 **Q. Does Staff believe the actual KUSF operational results will vary from the projections**
11 **presented in Staff’s testimony and calculations?**

12 A. Yes. My testimony relies on the information available at this time, therefore, Staff
13 expects the actual KUSF operational results to vary from its projections.

14 **II. RLEC Affordable Local Service Rates**

15 **Q. Please explain why the Commission determines the affordable rates for the RLECs.**

16 A. The affordable rates are considered to be a reasonable monthly rate rural customers should
17 pay toward their cost of service for KUSF support purposes.⁴ In March 2002, the
18 Commission approved a Stipulation and Agreement containing a methodology to
19 determine the RLECs’ affordable residential and single-line business service rates.⁵ The
20 calculation methodology was codified in K.S.A. 66-2005(e) and requires the Commission

⁴ K.S.A. 66-2005(d), (e).

⁵ Order Adopting Stipulation and Agreement, Docket No. 02-GIMT-068-KSF, March 11, 2002.

1 to determine the RLECs' affordable rates for March 1, 2007, and every two years
2 thereafter.

3 **Q. What are the current and proposed affordable rates?**

4 A. The current affordable rates, effective March 1, 2023, through February 28, 2025, are
5 \$18.75 for residential and \$21.75 for single-line business service.⁶ The proposed
6 affordable residential and single-line business rates are \$19.00 and \$22.00, respectively, a
7 monthly increase of \$.25 per line.

8 **Q. Please explain how the affordable rates are calculated.**

9 A. Please refer to Exhibit 1 for Staff's calculations. The first step was to review the October
10 1, 2024, rates and September 30, 2024 access lines reported by the RLECs and CenturyLink
11 on Attachment A and filed in the Docket to verify the information was accurate. Staff
12 verified each company's reported local rates with its approved tariff and also reviewed the
13 supporting access line documentation. If Staff had any questions about the reported data,
14 Staff contacted the company and the company filed a revised Attachment A, if needed.
15 Staff also adjusted the rates for two RLECs that include additional charges in their local
16 rates, as required by K.S.A. 66-2005(e)(2). Specifically, Staff removed the \$0.61 per line
17 Extended Area Service (EAS) charge and the \$7.95 per line EAS charge for Craw-Kan
18 Telephone Cooperative, Inc. (Craw-Kan) and Southern Kansas Telephone Co., Inc.
19 (Southern Kansas),⁷ respectively.

⁶ Order Adopting KUSF Year 27 Assessment Rate and Affordable Rates; Adopting Methodology for KUSF High-Cost Cap Implementation, Docket No. 23-GIMT-261-KSF, Jan. 17, 2023.

⁷ Order Approving Tariffs and Traffic Termination Agreement adopting Staff's Report and Recommendation, dated August 1, 2003, in Docket No. 02-SNKT-1014-EAS. Staff's Report and Recommendation, page 11, states the EAS additive is \$7.95 for residential and \$14.95 for business services. Due to the FCC's rate floor requirements, the Company needed to limit its residential rate additive in Docket No. 17-SNKT-284-TAR to \$7.05/line, however, due

1 Pursuant to K.S.A. 66-2005(e)(7), an RLEC may use a unified rate, or the same local
2 service rate for both residential and business service, instead of the affordable residential
3 and business rates. In general, a unified rate results in a residential rate that is greater than
4 the affordable residential rate and a business rate that is lower than the affordable business
5 rate. Home Telephone Co., Inc. (Home); Pioneer Telephone Association, Inc. (Pioneer);
6 Totah Telephone Company, Inc. (Totah); and United Telephone Association, Inc. (UTA)
7 use unified rates.

8 Each RLEC using a unified rate submitted its calculation of its proposed new unified rate.
9 Staff performed its own unified rate calculation for each RLEC, as shown on page 2 of
10 Exhibit 1. The unified rate was determined by multiplying the new affordable residential
11 rate of \$19.00 by the number of residential lines and the \$22.00 affordable business rate by
12 the number of business lines to develop the monthly revenue. Staff then multiplied each
13 service's revenue by twelve to determine the RLEC's annual revenue. To develop the
14 monthly unified rate, the total annual revenue was divided by the combined total of
15 residential and business lines and then divided by twelve.

16 K.S.A. 66-2005(e)(7) requires that the revenue derived from using a unified rate be equal
17 to or exceed the revenue the RLEC would generate if the RLEC charged the affordable
18 rates. As shown on Exhibit 1, page 2, Staff verified that each RLEC's unified rate will
19 generate an amount of annual revenue equal to or greater than the affordable rates.

20 **Q. Do additional statutory requirements apply to the calculation of the affordable rates?**

21 **A.** Yes. K.S.A. 66-2005(e)(5) requires an RLEC's affordable rates be equal to the rates

to the FCC changing its rate floor requirement, Southern Kansas is raising its residential EAS rate to the Commission-approved \$7.95/line.

1 approved by the Commission plus an amount equal to any rate increase approved pursuant
2 to K.S.A. 66-2007(b). Consolidated Communications of Kansas (Consolidated KS),⁸
3 Consolidated Communications of Missouri (Consolidated MO),⁹ Haviland Telephone
4 Company, Inc. (Haviland);¹⁰ have each increased rates under K.S.A. 66-2007(b), except
5 MoKan Dial, Inc. (MoKan)¹¹, who last increased in April 2015.

6 Since these RLECs do not receive KUSF support, they are not subject to the affordable rate
7 provisions in K.S.A. 66-2005(e)(8). Consolidated KS has one rate group below the
8 affordable rates, with the remainder of its rates exceeding the affordable rates.
9 Consolidated MO's rates exceed the affordable rates, MoKan's rates are below the
10 affordable rates, and Haviland's rates are equal to the affordable rates. When any of these
11 RLECs file requesting and subsequently qualify to receive KUSF support, the RLEC will
12 need to increase its local service rates to comply with the affordable rate requirements.

13 **Q. Once Staff accounted for the statutory provisions, how did Staff determine its**
14 **proposed residential affordable rate?**

15 A. The last step to calculate the affordable residential rate was to multiply each LEC's lines
16 in service as of September 30, 2024, by its October 1, 2024, residential rate to derive its

⁸ Tariff Revisions since Direct Testimony of Sandy Reams on Behalf of KCC, Docket No. 23-GIMT-261-GIT, December 14, 2022; Order Approving Rate Increase, Docket No. 23-SFLT-600-TAR, May 16, 2023; Order Approving Tariff Revisions, Docket No. 24-SFLT-413-TAR, March 28, 2024; Order Approving Tariff Revisions, Docket No. 24-SFLT-605-TAR, June 24, 2024; .

⁹ Tariff Revisions since Direct Testimony of Sandy Reams on Behalf of KCC, Docket No. 23-GIMT-261-GIT, December 14, 2022; Order Approving Tariff Revisions, Docket No. 23-FCMT-622-TAR, May 25, 2023; Order Approving Tariff Revisions, Docket No. 24-FCMT-444-TAR; Order Approving Revised Tariff, Docket No. 24-FCMT-628-TAR, July 11, 2024.

¹⁰ Order Approving Tariff Revisions and Requiring A Refund, Docket No. 12-HVDT-408-TAR, Feb. 29, 2012; Order Approving Rate Increase, Docket No. 13-HVDT-341-TAR, Feb. 20, 2013; Order Approving RLEC Tariff Revisions, Docket No. 23-GIMT-261-GIT, Feb. 14, 2023.

¹¹ Order Approving Rate Increase, Docket No. 13-MKNT-519-TAR, May 20, 2013; Order Approving Rate Increase, Docket No. 14-MKNT-348-TAR, May 8, 2014; and Order Approving Rate Increase, Docket No. 15-MKNT-351-TAR, April 30, 2015.

1 total monthly residential revenue. Then, the total revenue for all of the companies was
2 summed and divided by their aggregate total residential lines to calculate the weighted
3 average residential rate. The weighted average residential rate is \$18.96 and, consistent
4 with K.S.A. 66-2005(e)(1), the rate must be rounded to the nearest “quarter-dollar,”
5 resulting in an affordable residential rate of \$19.00.

6 **Q. The Commission must also determine the affordable single-line business rate. Please**
7 **explain how that rate was calculated.**

8 A. K.S.A. 66-2005(e)(2) requires the affordable single-line business rate to be \$3.00 higher
9 than the residential rate. Thus, once Staff calculated the \$19.00 per line per month
10 residential affordable rate, the business rate was calculated by adding the required \$3.00.

11 **Q. Will the RLECs need to file new local tariffs to reflect their local rate changes?**

12 A. Yes. The Commission order determining the RLECs’ affordable rates is due in January
13 2025.¹² K.S.A. 66-117(a) requires an RLEC to file tariff revisions “at least 30 days prior
14 to the effective date,” unless the Commission allows the rate change to become effective
15 “on less than 30 days’ notice.” Staff recommends each RLEC file its revised local service
16 tariff in this Docket no later than February 1, 2025, with a March 1, 2025, effective date.
17 This will provide sufficient time for Staff to submit a Report and Recommendation and the
18 Commission time to issue an order approving the tariffs prior to March 1, 2025. If an
19 RLEC proposes any change beyond the affordable rate increases adopted in this Docket,
20 the company should be directed to file the tariff in a separate, company-specific docket
21 pursuant to K.S.A. 66-117(a).

¹² Opening Order, ¶ 10, Ordering Clause G.

1 **II. KUSF FY 29 ASSESSMENT RATE**

2 **Q. Please summarize the components of the KUSF assessment rate.**

3 A. The KUSF assessment rate is comprised of two budgeted components: (1) the projected
4 amounts to be paid from the KUSF (KUSF Obligations); and (2) the revenue carriers are
5 projected to report to the KUSF for funding purposes (Revenue Base). As shown in
6 Exhibit STG-1, page 1, the KUSF FY 29 total KUSF Obligations of \$36.2 million are
7 reduced by the projected \$3.4 million Reserve¹³ and increased by \$2.4 million for the
8 Contingency Fund Allowance.¹⁴ This results in a \$35.2 million net KUSF Obligation to
9 be collected from a Revenue Base of \$289.9 million. The resulting proposed assessment
10 rate for KUSF FY 29 is 12.15%. A comparison of the KUSF FY 29 to the current KUSF
11 FY 28 (March 2024 through February 2025) data is summarized in Table 1:

12 **Table 1 (In Millions)**

Description	FY 29	FY 28	Impact on KUSF
Gross KUSF Obligations	\$ 36.2	\$ 37.1	\$ (0.9)
Less: Reserve	3.4	3.8	(0.4)
Plus: Contingency Allowance	2.4	2.5	(0.1)
Net KUSF Obligations	\$ 35.2	\$ 35.8	\$ (0.6)
Revenue Base	\$ 289.9	\$ 306.1	\$ (16.2)
Percentage Assessment Rate	12.15%	11.69%	.46%

13 **III. KUSF OBLIGATIONS**

14 **Q. Exhibit STG-1, page 1, shows \$30 million of KUSF support for the RLECs. Please**
15 **explain how this amount was calculated.**

16 A. Staff's KUSF support calculations for the RLECs are in Attachment A. Staff began with

¹³ K.S.A. 66-2008(a) and *Order No. 5 Establishing Carrier Assessment Rate for Year 2000 KUSF Contributions*, ¶ 26, Docket No. 00-GIMT-236-GIT, Jan. 19, 2000 (00-236 Jan. 2000 Order).

¹⁴ *Id.*, ¶ 28.

1 each RLEC's unadjusted annual KUSF support as of December 1, 2024, which in aggregate
2 totals \$36.2 million.

3 The aggregate amount is consistent with K.S.A. 66-2008(e)(3), which represents the
4 amount of KUSF support each RLEC combined would receive absent the \$30 million cap.
5 Lastly, Staff recognized that Golden Belt Telephone Association, Inc. (Golden Belt) will
6 fully recover its audit expense as of January 31, 2025, thereby reducing the Company's
7 KUSF support by \$18,382 annually, or \$1,532 per month, beginning February 2025.¹⁵ In
8 total, the RLECs' unadjusted FY 29 KUSF support is \$36,220,869, which exceeds the \$30
9 million cap. Thus, Staff recognized \$30 million of KUSF support for the RLECs.

10 **Q. After determining the RLECs' total FY 29 KUSF support, did Staff calculate the**
11 **FY 29 KUSF pro-rata support reductions and resulting annual KUSF support?**

12 A. Yes. Staff's pro-rata KUSF support reduction and each RLEC's resulting annual KUSF
13 support are included as Attachment A, page 2.

14 **Q. Did Staff adjust the RLECs' KUSF support to recognize they will increase their local**
15 **service rates?**

16 A. Yes. K.S.A. 66-2005(d) requires an RLEC's annual KUSF support to be reduced by an
17 amount equal to the local rate revenue increase associated with raising rates to the
18 affordable rates. K.S.A. 66-2005(d) also requires an RLEC's annual KUSF support to be
19 reduced by the calculated revenue increase, even if an RLEC elects not to raise its rates.

20 As shown in Exhibit STG-1, Attachment A, pages 2 - 4, Staff calculated each RLEC's local

¹⁵ Order Approving Settlement Agreement, Docket No. 19-GNBT-505-KSF, January 28, 2020. Includes \$18,382 per year/\$91,910 total, audit expense amortized over 5 years.¹⁶ Adopting Revised Intrastate Access Rates, Revenues and KUSF Adjustments; Directing RLEC Tariff Filings, , Determined in Docket No. 25-GIMT-164-GIT,.

1 service revenue increase by multiplying an RLEC's September 30, 2024, access lines by
2 the difference between its current monthly residential and business rates and the new
3 affordable rates. The RLECs with tariffed residential and business rates of \$18.75 and
4 \$21.75 will increase their rates \$.25 per line per month, or \$3.00 per line per year. Page 3
5 of Attachment A shows the RLECs' combined calculated annual revenue increase is
6 \$139,455.

7 **Q. Will the KUSF be reduced by \$139,455 on March 1, 2025?**

8 A. No. Of the \$139,455 total revenue, \$1,257 is attributable to Elkhart Telephone Company,
9 Inc. (Elkhart). Elkhart's revenue increase is greater than its current \$858 of annual KUSF
10 support, meaning Elkhart will no longer receive KUSF support, effective March 1, 2025.
11 An additional \$3,855 is attributed to Haviland, \$423 is attributable to LaHarpe Telephone
12 Company (LaHarpe), and \$2,127 is attributable to Moundridge Telephone Company
13 (Moundridge). Since Elkhart's KUSF support will be eliminated and the other four RLECs
14 do not receive KUSF support, the total impact of the local rate increases is a \$132,651
15 reduction to the KUSF for FY 29.

16 **Q. Did Staff make other adjustments to calculate the RLECs' KUSF support?**

17 A. Yes. The RLECs' annual KUSF support will also be reduced as a result of them adjusting
18 their intrastate access rates to interstate levels, effective July 1, 2025.¹⁶ The Commission
19 approved a total annual KUSF increase of \$7,727, however, Staff's calculations recognize
20 a \$5,151 increase since the RLECs' intrastate access revenue adjustments will be effective

¹⁶ Adopting Revised Intrastate Access Rates, Revenues and KUSF Adjustments; Directing RLEC Tariff Filings, , Determined in Docket No. 25-GIMT-164-GIT,.

1 for eight months (July 2025 through February 2026) of KUSF FY 29.

2 As a result of all of these adjustments, the RLECs' current gross, unadjusted KUSF support
3 of \$36.2 million will decrease to \$36.1 million for KUSF FY 29, exceeding the \$30 million
4 cap pursuant to K.S.A. 66-2008(e). Thus, Staff's calculation of the KUSF FY 29
5 assessment rate recognizes \$30 million for the RLECs.

6 **Q. Since the RLECs' total KUSF FY 29 support exceeds \$30 million, did Staff calculate**
7 **their pro-rated KUSF FY 29 support?**

8 A. Yes. Staff's current pro-rata KUSF support adjustment calculations are included as
9 Attachment A, page 5, and each RLEC's KUSF FY 27 monthly and cumulative KUSF
10 support is shown on page 6 of Attachment A. I want to note that UTA is selling its South
11 Englewood, Oklahoma exchange, which will result in its annual KUSF support being
12 reduced \$16,951,¹⁷ with this support being redistributed amongst the other RLECs
13 receiving KUSF support. Once UTA receives all federal and state approvals and the sales
14 transaction's closing date is known, Staff will recalculate the pro-rated KUSF support
15 payable to each RLEC and file a Report and Recommendation in the applicable annual
16 KUSF Docket.

17 **Q. Please explain how Staff calculated Brightspeed's \$5.017 million of annual KUSF**
18 **support.**

19 A. The calculation of Brightspeed's annual KUSF support is governed by K.S.A. 66-2008(c)
20 and capped at \$11.4 million.¹⁸ K.S.A. 66-2008(c)(3) requires that Brightspeed's annual

¹⁷ Order Granting COC and ETC Relinquishment; Approving Tariff Revision and Reduction in KUSF Support, Ordering Clause C, Docket No. 22-UTAT-519-CCS, July 28, 2022.

¹⁸ CenturyLink received \$13,279,541 in KUSF support for the Fiscal Year ended February 2013. The 90% limit results in a total of \$11,951,587, exceeding the \$11.4 million.

1 KUSF support be calculated based on the Commission’s high-cost KUSF support model.¹⁹
2 The other element of Brightspeed’s KUSF support is access revenue as described in more
3 detail below. The combined amount of Brightspeed’s high-cost support and access revenue
4 is \$5.017 million.

5 **Q. Please summarize how the cost model works.**

6 A. The cost model includes 112 wire centers that are disaggregated into two zones.²⁰ Zone 1
7 is essentially areas located within city boundaries and Zone 2 generally lies outside city
8 boundaries. As shown in Attachment B, monthly KUSF support is dependent upon the
9 wire center and zone in which a line is located, with support ranging from \$0.15 to \$243.23
10 per line per month.

11 **Q. How is Brightspeed’s KUSF support determined via the cost-model?**

12 A. Brightspeed enters its KUSF support-eligible lines in-service, as of September 30, 2024,
13 into the cost model for each wire center and zone and submits the data in the Docket. Staff
14 then reviews the data for accuracy, including ensuring the lines input in the cost model
15 match the Company’s supporting documentation. Based on Staff’s review, Brightspeed
16 qualifies to receive \$4.767 million of annual KUSF support for high-cost support.

17 **Q. What amount of access revenue does Brightspeed qualify to recover?**

18 A. First, Staff reviewed Brightspeed’s documentation to support its intrastate access usage for

¹⁹ Order No. 10: Order Adopting a Forward Looking Cost Methodology for Purposes of Determining KUSF Support and Selecting the FCC’s Proxy Cost Model, Sept. 30, 1999; Order No. 16: Order Determining the Kansas-Specific Inputs to the FCC Cost Proxy Model to Establish a Cost-Based Kansas Universal Service Fund, Dec. 29, 1999, Docket No. 99-GIMT-326-GIT.

²⁰ Order 6: Addressing Zone Targeting and Remaining Implementation Issues for Year 2000 KUSF Distributions, Docket 00-236, Feb. 14, 2000.

1 the twelve-month period ended September 30, 2024.²¹ The annual access usage is then
2 multiplied by the difference between the interstate and intrastate access rates as of
3 December 30, 2009.²² Attachment B, page 5, shows that based on the annual usage through
4 September 30, 2024, Brightspeed qualifies to recover an estimated \$410,652 from the
5 KUSF during FY 29.

6 **Q. Please explain why the amount Brightspeed recovers is estimated.**

7 A. Brightspeed's intrastate access revenue recovery for any KUSF fiscal year is estimated
8 based on the most recent twelve-month usage. For FY 29, the actual recovery will be based
9 on the usage for October 1, 2024, through September 30, 2025, which is not known at this
10 time. Therefore, the actual revenue Brightspeed should recover from the KUSF during FY
11 29 will be trued-up next year to reflect the actual usage.²³

12 In the FY 29 calculations, Brightspeed received \$244,764 of intrastate access revenue for
13 October 2023 through September 2024, which was based on last year's usage, or as of
14 September 30, 2023. However, based on the actual usage through September 2024, the
15 Company should have recovered \$410,652, or \$165,888 more than it received. To true-up
16 that amount, the \$165,888 under-recovery is added to the \$244,764 estimated FY 29
17 revenue recovery, resulting in the Company recovering \$576,539 during FY 29.

18 **Q. How did Staff determine the \$230,056 to fund Dual Party Relay Service (DPRS)?**

19 A. As shown in Attachment C, the DPRS consists of two components – the actual relay service
20 provided by T-Mobile f/k/a Sprint Communications Company, LP (T-Mobile), to provide

²¹ Confidential CenturyLink Data Submission, Docket 25-141, Oct. 14, 2024.

²² Docket 08-1023 Order.

²³ Docket 08-1023 Order on Reconsideration.

1 relay service²⁴ and the administration of the DPRS by Assistive Technologies for Kansans
2 (ATK). For March through October 2024, DPRS disbursements to T-Mobile totaled
3 \$119,195, for a monthly average of \$14,899. Annualizing this amount derives an estimated
4 \$178,792 for T-Mobile to provide DPRS for the current KUSF FY 28. The DPRS per
5 minute contract rate will increase from \$3.71 to \$4.28, or 15.36%. Staff applied the 15.36%
6 increase to the \$178,792 to derive an annual increase of \$27,469 for T-Mobile to provision
7 DPRS. Thus, Staff's proposed DPRS budget for T-Mobile to provide DPRS during KUSF
8 FY 29 is \$206,262.

9 The second DPRS component is ATK's administration of the program. Staff relied on the
10 proposed contract extension with ATK to administer the DPRS program next year, which
11 provides a total of \$23,794 for DPRS administration. Adding the two components together
12 derives a total budget of \$230,056 for DPRS.

13 **Q. Please explain Staff's calculation of the Telecommunications Access Program (TAP)**
14 **budget.**

15 A. The TAP is also comprised of two components. The first component is ATK's
16 administration of the TAP. Staff relied on the proposed contract extension with ATK to
17 administer the TAP program next year, which provides a total of \$226,468 for direct
18 administration costs (salaries, benefits, training, etc.), the purchase of certain TAP
19 equipment, and a 10% indirect cost allowance. The second TAP component is the cost of
20 consumer equipment purchased from third-party vendors. Third-party vendor equipment

²⁴ Contract, Section 3.0, "Costing Sheet," available for viewing at:
https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL.

1 costs for March through October 2024 were \$40,445, or a monthly average of \$5,056. To
2 estimate the total TAP equipment costs, Staff annualized this monthly average to derive a
3 budget of \$60,668. Adding the two components together results in a TAP budget of
4 \$287,136 for FY 29.

5 **Q. How did Staff calculate the \$108,590 budget for the Kansas Lifeline Service Program**
6 **(KLSP)?**

7 A. Attachment D, page 2, shows the total KLSP credits for March through October 2024 were
8 \$72,393, or a monthly average of \$9,049. Dividing the \$9,049 by the \$7.77 per line per
9 month KLSP credit indicates the KLSP provided monthly credits to 1,165 low-income
10 subscribers. By annualizing the \$9,049 average monthly credits, Staff calculated a total of
11 \$108,590 for KLSP funding for KUSF FY 29.

12 KLSP program participation and funding continue to decrease. Therefore, to determine
13 the reasonableness of using the 8-month average as the funding basis, Staff also calculated
14 the average monthly KLSP expense and credits for the six-month period of May through
15 October 2024 (\$8,718 and 1,122, respectively) and the three-month period of August
16 through October 2024 (\$8,405 and 1,082, respectively). Staff annualized each of these,
17 deriving annual KLSP funding of \$104,615 and \$100,855, respectively. Since the 8-month
18 average results in a slightly higher funding level, Staff used the \$108,590 as the total FY
19 29 KLSP expense.

20 Staff then needed to determine if any projected change should be recognized for next year's
21 KLSP funding. Both the KLSP funding and subscribership have trended downward the
22 past three years, as shown in page 1 of Attachment D. Subscribership between the years

1 ended February 2023 and 2024 declined 21.89%, with funding declining from \$167,234 to
2 \$139,029. Between the years ended February 2022 and 2023, KLSP subscribership
3 declined 16.87% and funding declined from \$226,317 to \$167,234. While it is likely KLSP
4 subscribership and funding will continue to decline, Staff needs to ensure adequate funding
5 exists for the KLSP. Staff, therefore, applied a nominal 1% growth to the 8-month average
6 KLSP credits of \$9,049, resulting in \$109,676 of KLSP funding for KUSF FY 29.

7 **Q. How was the KUSF administration budget determined?**

8 A. The \$570,871 budget for next year's KUSF administration includes the following
9 expenses, shown in Attachment E:

- 10 1. KUSF daily administration expense: The Commission's current KUSF administration
11 contract with Vantage Point Solutions (VPS) is renewed through February 28, 2026.
12 The current KUSF administration contract with VPS provides \$234,060 for day-to-day
13 administration fees for KUSF FY 29.²⁵ In addition to the daily administrative
14 functions, VPS and outside legal counsel have incurred expense related to the pending
15 TAG Mobile, LLC (TAG) bankruptcy case.²⁶ While Staff anticipates additional
16 expenses will be incurred before the case is finalized, there isn't a great way to estimate
17 how much these expenses might amount to. For a conservative estimate, Staff used the
18 total administrative and legal bankruptcy related expense estimated during the FY 26
19 KUSF assessment proceeding, which resulted in the inclusion of an additional \$4,554
20 for administrative and legal expense, for a total administrative expense of \$238,614.
- 21 2. KUSF carrier audit expense: The Commission's current contract with VPS provides
22 \$298,607 for VPS to perform the 16 carrier audits during FY 29.²⁷
- 23 3. KUSF third-party audit expense: The Commission's contract with BT&CO PA
24 (BT&CO) to perform the annual KUSF financial audit and an Agreed-Upon-Procedure
25 (AUP) review of the KUSF administrator's internal controls and contractual
26 compliance sets a maximum fee of \$20,800 for the financial audit and \$12,850 for the

²⁵ Current KCC/VPS contract, Section 3, "Costing Sheet", is available at:
https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL

²⁶ *In RE TAG Mobile, LLC Debtor*, United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Case No.17-33791 -11SGJ.

²⁷ KCC/VPS Contract, Section 3, "Costing Sheet."

1 AUP review.²⁸ Staff, therefore, included a total of \$33,650 for a new Third-Party
2 Auditor to perform the financial audit and AUP review.

3 **IV. KUSF RESERVE**

4 **Q. Please explain how Staff calculated the \$3.4 million Reserve.**

5 A. The Reserve or estimated KUSF balance as of February 28, 2025, is an offset to the gross
6 KUSF Obligations.²⁹ Attachment F, pages 1 and 2, include Staff’s calculation of the KUSF
7 Reserve and pages 3 and 4 are the KUSF Performance Reports for April (March) and
8 November (October) 2024. The Performance Reports include the beginning and ending
9 KUSF balances and the year-to-date KUSF operational results. Staff used the actual KUSF
10 monthly operational results through October 2024 and projected the revenue, receipts, and
11 disbursements for November 2024 through February 2025 to estimate the ending FY 28
12 KUSF balance.

13 Staff collaborated with VPS to project each company’s revenue based on the revenue
14 reported by each company for the months of March through October 2024, as shown in
15 confidential Attachments G (RLECs, Brightspeed, and SWBT); H (wireless providers); I
16 (Interconnected VoIP providers); and J ((interexchange (IXC) and other providers)).
17 Companies that earn \$25,000 or less of annual revenue can elect to report revenue and pay
18 assessments on an annual or semi-annual basis and have already reported their revenues
19 and paid their assessments, so no projections are necessary, unless the company is
20 delinquent. If a semi-annual reporter is delinquent, the projected revenue is an amount

²⁸ KCC/BT&CO Contract, Section 3, “Cost Sheet”, available at:
https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL?

²⁹ 00-236 Jan. 2000 Order.

1 equal to the revenue reported for the first semi-annual period. Companies earning \$25,001
2 and up to \$50,000 of annual revenue may report revenue and pay assessments on a quarterly
3 basis and, for these companies, projected revenue for the fourth quarter (December 2024 -
4 February 2025) is equal to the revenue reported for the third quarter (September -
5 November 2024). Projected revenue for a delinquent quarterly-reporter is equal to the most
6 recent quarter's reported revenue.

7 The majority of companies report revenue and pay assessments on a monthly basis, and,
8 for monthly reporters, projections are based on the "lower or average" methodology. This
9 methodology, used for over ten years,³⁰ recognizes revenue trends reported by a company.
10 Specifically, monthly revenue projections are derived by: (1) calculating the average
11 monthly revenue reported for March through October; and (2) comparing the monthly
12 average to the August, September, and October revenue. When the average monthly
13 revenue exceeds the revenue reported for two of the three months, the projected monthly
14 revenue is equal to the average monthly revenue. Alternatively, when the average monthly
15 revenue is less than the revenue reported for two of the three months, the lowest monthly
16 reported revenue is used for the projected revenue. For example, a company reported
17 \$105,000 for August, \$107,500 for September, and \$104,500 for October, or total revenue
18 of \$850,000 and an average monthly revenue of \$106,250. The August and October
19 revenue are less than the \$106,250 monthly average revenue, with October's revenue being
20 the lowest. Thus, October's revenue was recognized as the projected monthly revenue.

21 **Q. What is the basis for the Miscellaneous Revenue recognized in Staff's calculations?**

³⁰ The methodology was first employed in Staff's calculations to determine the KUSF assessment rate effective March 1, 2007; Direct Testimony of Sandra K. Reams, Docket No. 07-GIMT-276-GIT, Dec. 20, 2006.

1 A. Miscellaneous revenue includes prior year adjustments arising from a company submitting
2 revised revenues or coming into compliance with its KUSF obligations, investment
3 interest, and KUSF penalties. These revenue categories fluctuate monthly, therefore, Staff
4 recognized the monthly average for each miscellaneous revenue category. Staff is not
5 aware of any revenue write-offs that may occur the remainder of this year and did not
6 include any projection for the write-off category.

7 **Q. How were the November 2024 through February 2025 disbursements derived for**
8 **high-cost support, DPRS, TAP, and KLSP?**

9 A. Staff recognized the October 2024 high-cost support disbursements as the projected
10 monthly disbursement since there are not any known changes for the remaining months in
11 FY 28. Staff recognized the monthly average expense calculated in Attachment C, or
12 \$17,161 for DPRS and \$27,795 for TAP. I note the averages calculated in Attachment C
13 are not the same as the 8-month average shown in Attachment F, page 2, since ATK's
14 administrative expense is paid quarterly instead of monthly. Staff recognized \$9,049 for
15 the KLSP credits, based on the average monthly credits disbursed for subscribers.

16 **Q. How did Staff determine the audit and KUSF Administration disbursements?**

17 A. For carrier audits, VPS was paid \$142,787 for work performed between March and June
18 2024. Attachment F, page 2, identifies the remaining maximum contract amount VPS can
19 earn in FY 28 for carrier audit work as \$147,122. Thus, Staff recognized this amount to be
20 in February 2025. The third-party audits of the KUSF are completed, so no further expense
21 was recognized for third-party audits.

1 For the administration expense, Staff recognized the \$18,937 monthly expense per the
2 Commission's contract with VPS and \$74 of other administration expense. Lastly, the
3 KUSF incurs monthly banking fees, therefore, Staff recognized the average monthly fee for
4 each month.

5 **Q. Please explain why the "TAG Mobile Liability," identified on page 1 of Attachment**
6 **F is excluded from the Reserve calculation.**

7 A. In October 2017, the Commission directed TAG Mobile, LLC (TAG), a Lifeline ETC, to
8 repay \$942,298.98 of KLSP credits to the KUSF.³¹ That same month, an involuntary
9 Chapter 7 bankruptcy was filed against TAG and the Commission filed a claim for the
10 monies owed to the KUSF. In February 2018, the case was converted to a Chapter 11
11 proceeding, a bankruptcy trustee was appointed, and the sale of TAG is pending. It is
12 Staff's understanding that once the sale of TAG is finalized, the amount of monies, if any,
13 to be paid to the KUSF will be determined. Since the recovery amount is unknown, Staff
14 excluded the monies owed to the KUSF from the Reserve calculation.

15 **V. CONTINGENCY ALLOWANCE**

16 **Q. How was the \$2.4 million Contingency Fund Allowance calculated?**

17 A. The Commission determined a Contingency Fund Allowance, equal to 7.50% of the year's
18 adjusted KUSF Obligations, is to be included in the KUSF.³² Thus, 7.50% of the \$33.0
19 million adjusted KUSF Obligations results in a \$2.4 million Contingency Fund Allowance.

³¹ *Order Revoking TAG Mobile's State and Federal ETC Designation*, Docket No. 16-TAGC-323-SHO, Oct. 19, 2017.

³² 00-236 Jan. 2000 Order, ¶ 26.

1 **VI. INTRASTATE REVENUE BASE**

2 **Q. How was the FY 29 Revenue Base of \$289.9 million calculated?**

3 A. The \$289.9 million Revenue Base consists of the projected revenues carriers will report to
4 the KUSF during FY 29 and includes the carrier or carrier categories of \$58.9 million for
5 the LECs and electing carriers, \$123.9 million for wireless providers, \$24.8 million for
6 VoIP providers, and \$82.3 million for IXC/other carriers.

7 As I previously discussed, each carrier's revenues for the remainder of FY 28 were
8 projected and then Staff analyzed the variances in each carrier's or carrier category's
9 annual revenues as shown in confidential Attachment K. The telecommunications industry
10 continues to report less intrastate revenue to the KUSF each year. Therefore, Staff needed
11 to determine the amount of revenue decline to recognize for next year. Staff determined
12 a revenue adjustment factor for each carrier and/or carrier category based on its revenue
13 variances. When determining a revenue factor to apply, Staff considered that the KUSF
14 FY 28 projected revenue is based on the "lower or average" methodology, which
15 recognizes when a carrier has reported declining revenues.

16 **Q. What did Staff's analyses of the RLECs, Brightspeed, and SWBT's revenues show.**

17 A. Confidential Attachment K shows that these carriers' revenues continue to decline
18 annually, however, the annual revenue decline has slowed. For FY 28, revenue reported
19 to the KUSF is projected to be approximately \$14.3 million less than last year, however,
20 the reported decline was \$9.0 million the prior year. To capture a similar amount of annual
21 revenue, the percentage factor recognized for a carrier or carrier category must increase.

1 Therefore, when Staff applied a percentage factor, it considered the resulting annual
2 revenue change that resulted from applying the percentage factor.

3 The RLECs' revenue decline is projected to be less this year than the decline reported
4 last year, however, this may be partially due to the RLECs raising local service rates to
5 the affordable rates. The RLECs' annual decline from FY 27 to projected FY 28 is
6 12.1%, with a current two-year average of 10.18%. Since the RLECs' downward revenue
7 trends are slowing and the current year's revenues reflect local rate increases, Staff
8 projected a 10.00% revenue decline for the RLECs for FY 29.

9 Brightspeed and SWBT's projected annual revenue and percent changes are confidential.
10 The KUSF Annual Revenue Growth/Decline Analysis for Brightspeed and SWBT can be
11 reviewed at Confidential Attachment K.

12 **Q. What are the results of Staff's analysis for the wireless carriers?**

13 A. The wireless industry is projected to report \$858,386 less in revenue to the KUSF this
14 year, again a lower revenue decline compared to the \$3.5 million revenue reduction
15 reported last year and the \$6.9 million reduction two years ago. The wireless industry's
16 annual revenue decline from FY 27 to projected FY 28 is 0.68%, with a current two-year
17 average decline of 1.67%. Since the reduction in revenues is declining over the years,
18 Staff applied a 1.50% reduction, resulting in the wireless industry projected to report \$1.9
19 million less revenue to the KUSF next year.

20 **Q. Does Staff project the VoIP industry will report less revenue to the KUSF?**

21 A. Yes. Staff projects the VoIP industry will report a decrease of \$284,882, or 1.16%, less
22 to the KUSF in FY 28. In comparison, the VoIP industry reported \$1,200,529 more

1 revenue last year and an increase of \$1,691,428 the prior year. The VoIP industry's
2 annual revenue variances from FY 27 to projected FY 28 are a 1.16% decrease, with a
3 recent two-year average increase of 1.98%. Staff applied a 2.00% increase, or \$487,074
4 of increased revenue, for FY 29.

5 **Q. Please explain Staff's analysis for the IXC/Other carrier category.**

6 A. The IXC/other carriers are projected to report \$7.5 million less revenue to the KUSF this
7 year, a reduction of 7.70%. In comparison, this group reported \$11.8 million less revenue
8 last year, for a 10.74% decline, and a \$12.0 million, or 9.86% reduction, two years ago.
9 The current two-year average revenue decline is 9.22%. Staff applied a 9.00% revenue
10 reduction factor, for a total reduction of \$8.1 million for FY 29.

11 **Q. How does the use of the revenue adjustment factors impact Staff's calculations?**

12 A. The revenue adjustment factors result in Staff projecting a decrease of 6.02%, or \$18.6
13 million, in the revenue reported to the KUSF in FY 29.

14 **Q. Did Staff review the reasonableness of its revenue projections?**

15 A. Yes. Staff uses the best information available at the time it files testimony and its analysis
16 indicate the Revenue Base projections have been fairly accurate. Confidential Attachment
17 L shows Staff's analysis of its projected KUSF reported receipts to the actual receipts for
18 the most recent completed KUSF FY of March 2023 through February 2024 (FY 27). For
19 FY 27, providers reported a total of \$331.4 million in revenue compared to the \$329.1
20 million Staff had projected, an annual difference of \$2,300,788. When Staff calculated
21 the FY 28 assessment rate of 11.69%, Staff had projected a Revenue Base of \$306.1
22 million of revenue. In comparison, Staff currently projects providers will report \$308.4

1 million of revenue for FY 28, or \$2.4 million more than originally projected. This means
2 that if the current 11.69% assessment rate could have been based on the current
3 projections, the rate would have been 11.60%, or .09% (sixteen hundredths) of a percent
4 lower.

5 Staff's projections also impact its proposed FY 29 assessment rate. If Staff based the
6 assessment rate on its current FY 28 revenue projection of \$308.4 million for the FY 29
7 assessment rate, Staff's proposed rate would be 11.42%. However, since Staff recognizes
8 changes in revenues, Staff is proposing an 12.15% assessment rate for FY 29.

9 **Q. Does this conclude your Direct Testimony?**

10 A. Yes.

COMPANY	Tariffed Res Rate (9/30/2024) (A)	Rate Used for Avg Rate Calc (B)	9/30/2024 Res Line Count (I) (C)	Revenue (D = B x C)	Comments (E)
Blue Valley (All Exchanges)	18.75	18.75	1,622	30,413	Docket 17-304, 23-261
Columbus	18.75	18.75	194	3,638	Will receive KUSF, Docket No. 22-546. Docket 17-307, 23-261
Consolidated Communications KS Cedar Point & Saffordville Exchanges (former Bluestem)	24.24	24.24	133	3,224	Does not receive KUSF Increased rates in Docket Nos. 12-621, 13-643, 20-331, 21-288, 22-378, 23-600, 24-413, & 24-605. Cedar Point & Saffordville Exchanges affordable rate for KUSF will be \$7.50 above RLEC affordable rate. Americus Exchange affordable rate for KUSF will be \$7.38 above RLEC affordable rate.
All other Exchanges	20.77	20.77	430	8,931	Does not receive KUSF Increased rates in Docket Nos. 12-621, 13-643, 20-331, 21-288, 22-378, 23-600, 24-413, & 24-605. All other exchanges except Jetmore affordable rate for KUSF will be \$7.50 above RLEC affordable rate. Jetmore Exchange affordable rate for KUSF will be \$7.18 above RLEC affordable rate.
Consolidated Communications MO	22.50	22.50	58	1,305	Does not receive KUSF. Increased rates in Docket Nos. 12-622, 13-642, 20-327, 21-304, & 22-401. Company's affordable rate for KUSF will be \$7.50 above RLEC affordable rate.
Craw-Kan	19.36	18.75	7,526	141,113	Docket 04-701 added \$0.61 for EAS Dockets 17-303, 21-095, 23-261
Cunningham	18.75	18.75	524	9,825	Docket 17-293, 23-261
Elkhart	18.75	18.75	174	3,263	Docket 17-294, 23-261
Golden Belt	20.25	20.25	1,527	30,922	Docket Nos. 12-638, 17-008, 21-095, 23-261
Gorham - All Exchanges	18.75	18.75	305	5,719	Docket 17-288, 23-261
H&B Comm.	18.75	18.75	143	2,681	Docket 17-313, 23-261
Haviland	18.75	18.75	999	18,731	Does not receive KUSF Docket Nos. 12-408, 19-056, 21-095, 23-261
Home	19.10	18.75	965	18,094	Unified Rate Docket 17-295, 23-261
JBN	18.75	18.75	682	12,788	Docket 21-095, 23-261
KanOkla	18.75	18.75	592	11,100	Docket 17-564 (reduced to \$17.25), 21-095, 23-261
LalHarpe	18.75	18.75	118	2,213	Does not receive KUSF. Docket 17-296, 23-261
Madison	18.75	18.75	205	3,844	Docket 17-308, 23-261
MoKan	16.60	16.60	701	11,637	Does not receive KUSF Increased rates in Docket Nos. 13-519, 14-348, & 15-351. Company's affordable rate will be \$4.50 above affordable rate.
Moundridge	18.75	18.75	709	13,294	Does not receive KUSF Docket 17-008
Mutual	18.75	18.75	167	3,131	Docket 17-297, 23-261
Peoples	18.75	18.75	786	14,738	Docket 17-312, 23-261
Pioneer	20.50	18.75	1,833	34,369	Unified Rate Additive \$1.75/line Docket 21-095, 23-261
Rainbow	18.75	18.75	835	15,656	Docket 17-291, 21-095, 23-261
Rural (All exchanges)	18.75	18.75	4,230	79,313	Docket 21-095, 23-261
S&A	18.75	18.75	279	5,231	Docket 21-095, 23-261
S&T	18.75	18.75	881	16,519	Docket 17-292, 23-261
South Central	18.75	18.75	537	10,069	Docket 21-095
Southern KS -Others	18.75	18.75	508	9,525	Docket 02-1014 (EAS for Clearwater) Docket 21-095, 23-261
Southern KS - Clearwater	26.70	18.65	447	8,337	Docket 02-1014: EAS additive (Clearwater) Docket 17-284, 23-261
Totah	19.10	18.75	388	7,275	Unified Rate Additive \$.25/line Docket 21-095, 23-261
Tri-County	18.75	18.75	1,518	28,463	Docket 17-302, 23-261
Council Grove	18.75	18.75	588	11,025	Docket 17-302, 23-261
Twin Valley (RG 1-3)	18.75	18.75	1,752	32,850	Docket 17-311, 23-261
United Tele. Assoc.	19.75	18.75	2,135	40,031	Unified Rate Additive \$1.00/line Docket 21-095, 23-261
Wamego	18.75	18.75	558	10,463	Docket 17-285, 23-261
Wheat State	18.75	18.75	812	15,225	Docket 17-287, 23-261
Wilson	18.75	18.75	397	7,444	Docket 17-286, 23-261
Zenda	18.75	18.75	102	1,913	Docket 21-095, 23-261
RLEC TOTAL		\$ 18.82	36,360	\$ 684,305	
		Avg Rate	Lines	Weighted Rev	Lines
RLECs		\$ 18.82	36,360	\$ 684,305	78%
Brightspeed RG 1 - 3 [2]		19.48	9,994	194,683	22%
Affordable Rate Calculation		\$ 18.96	\$ 46,354	\$ 878,988	100%
Rounded to Nearest Quarter- Dollar, 3/1/2025:					
Residential Affordable Rate		\$ 19.00			
Business Affordable Rate		\$ 22.00			
Notes:					
1. Include residential lines in bundles and concession lines.					
2. Order Approving Tariff Revisions, Docket No. 18-UTDT-483-TAR, May 15, 2018.					

Home			
	Unified Rate	Lines	Annual Rev
Res.	\$ 19.40	965	\$ 224,652
Bus.	\$ 19.40	140	\$ 32,592
		<u>1,105</u>	<u>\$ 257,244</u>
	Affordable Rate	Lines	Annual Rev
Res.	\$ 19.00	965	\$ 220,020
Bus.	\$ 22.00	140	\$ 36,960
		<u>1,105</u>	<u>\$ 256,980</u>
Affordable Rate Revenue			\$ 256,980
Total Res & Bus Lines			<u>1,105</u>
Estimated New Rate			<u>\$ 19.38</u>
Rounded Rate			\$ 19.40
Annual Difference- Unified Rate to Affordable Rate			\$ 264
Monthly Difference			\$ 22.00
Per Line Variance			\$ 0.02
Pioneer			
	Unified Rate	Lines	Annual Rev
Res.	\$ 20.75	1,833	\$ 456,417
Bus.	\$ 20.75	2,613	\$ 650,637
		<u>4,446</u>	<u>\$ 1,107,054</u>
	Affordable Rate	Lines	Annual Rev
Res.	\$ 19.00	1,833	\$ 417,924
Bus.	\$ 22.00	2,613	\$ 689,832
		<u>4,446</u>	<u>\$ 1,107,756</u>
Affordable Rate Revenue			\$ 1,107,756
Total Res & Bus Lines			<u>4,446</u>
Estimated New Rate			<u>\$ 20.76</u>
Rounded Rate			\$ 20.75
Annual Difference- Unified Rate to Affordable Rate			\$ (702)
Monthly Difference			\$ (58.50)
Per Line Variance			\$ (0.01)
Totah			
	Unified Rate	Lines	Annual Rev.
Res.	\$ 19.32	388	\$ 89,954
Bus.	\$ 19.32	47	\$ 10,896
		<u>435</u>	<u>\$ 100,850</u>
	Affordable Rate	Lines	Annual Rev.
Res.	\$ 19.00	388	\$ 88,464
Bus.	\$ 22.00	47	\$ 12,408
		<u>435</u>	<u>\$ 100,872</u>
Affordable Rate Revenue			\$ 100,872
Total Res & Bus Lines			<u>435</u>
Estimated New Rate			<u>\$ 19.32</u>
Rounded Rate			\$ 19.32
Annual Difference- Unified Rate to Affordable Rate			\$ (22)
Monthly Difference			\$ (1.80)
Per Line Variance			\$ (0.00)
United Telephone Association (UTA)			
	Unified Rate	Lines	Annual Rev
Res.	\$ 20.00	2,135	\$ 512,400
Bus.	\$ 20.00	924	\$ 221,760
		<u>3,059</u>	<u>\$ 734,160</u>
	Affordable Rate	Lines	Annual Rev
Res.	\$ 19.00	2,135	\$ 486,780
Bus.	\$ 22.00	924	\$ 243,936
		<u>3,059</u>	<u>\$ 730,716</u>
Affordable Rate Revenue			\$ 730,716
Total Res & Bus Lines			<u>3,059</u>
Estimated New Rate			<u>\$ 19.91</u>
Rounded Rate			\$ 20.00
Annual Difference- Unified Rate to Affordable Rate			\$ 3,444
Monthly Difference			\$ 287.00
Per Line Variance			\$ 0.09

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

In the Matter of an Investigation to Determine)
the Annual Assessment Rate for the Twenty-Ninth)
Year of the Kansas Universal Service Fund,)
Effective March 1, 2025)

Docket No. 25-GIMT-141-GIT

REDACTED

EXHIBIT STG-1

And

ATTACHMENTS A - L

to the DIRECT TESTIMONY

OF

STEVE GARRETT

ON

BEHALF OF THE

KANSAS CORPORATION COMMISSION STAFF

December 9, 2024

Line	Description	Explanation	FY 29
	<u>KUSF Obligations:</u>		<u>(3/1/2025)</u>
1	Rural LECs	Rural LECs' KUSF support (Attachment A).	\$ 30,000,000
2	Brightspeed	Brightspeed's KUSF support, comprised of high-cost KUSF support and intrastate access revenue recovery, which is subject to True-up (confidential Attachment B).	5,017,252
3	Dual Party Relay Service (DPRS)	Relay budget (Attachment C).	230,056
4	Telecommunications Access Program (TAP)	TAP budget (Attachment C).	287,136
5	Kansas Lifeline Service Program (KLSP)	KLSP budget (Attachment D)	109,676
6	Administration and Audits	Day-to-day administration, carrier audits, third-party KUSF Financial Audit & Agreed-Upon-Procedures (Attachment E).	<u>570,871</u>
7	Gross KUSF Obligations	Sum of Lines 1 through 6	\$ 36,214,991
8	Less: Projected Year 28 Ending Reserve	Estimated Reserve (Attachment F).	<u>3,450,421</u>
9	Adjusted KUSF Obligations	Adjusted KUSF monies to collect prior to Contingency Fund. (Line 7 less Line 8)	\$ 32,764,570
10	Plus: Contingency Allowance	Equals 7.50% of Adjusted KUSF Obligations (Order, Docket No. 00-GIMT-236-GIT, Jan. 19, 2000)	<u>2,457,343</u>
11	Net KUSF Obligations	Line 9 plus Line 10	<u>\$ 35,221,912</u>

Line	Description	Explanation	FY 29
RETAIL REVENUES:			<u>3/1/2025</u>
1	Rural LECs	Rural LEC reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments G & K)	\$ 13,546,499
2	Brightspeed	Brightspeed reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments G & K)	* [REDACTED] *
3	SWBT	SWBT reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments G & K)	* [REDACTED] *
4	Wireless Providers	Wireless providers' reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments H & K)	123,873,223
5	VoIP	VoIP providers' reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments I & K)	24,840,752
6	IXCs/Others	IXC/Other providers' reported revenue provided by Administrator and Staff revenue projections. (Confidential Attachments J & KL)	82,289,674
7	Total Assessable Revenue Base	Sum of Lines 1-6.	<u>\$ 289,980,095</u>
8	Net KUSF Obligations	Adjusted KUSF monies to collect prior to Contingency Fund. (STG-1, p. 1, Line 11)	\$ 35,221,912
9	Total Assessable Revenue Base	Line 7	289,980,095
10	Proposed KUSF Assessment Rate	Line 8 / Line 9	<u>12.15%</u>

Line	Company	Subtotal -									
		Annual KUSF Support (12/1/24)	Known/Estimated Adjustments	FY 29 Annual KUSF Support	Less: Local Rate Rebalancing (N/A)	Unadjusted FY 29 Annual KUSF Support	Intrastate Access Revenue Adjustments (NA)	Gross Unadjusted Annual FY 29 KUSF Support	Less: FY 29 Pro-rated Adjustment	Pro-Rated Annual KUSF FY 29 Support (3/1/2025)	
		(A)	(B)	(C = A + B)	(D)	(E = C + D)	(F)	(G = E + F)	(H)	(I = G + H)	
1	Blue Valley	\$ 1,619,764		\$ 1,619,764	\$ (5,652)	\$ 1,614,112	\$ 7,158	\$ 1,621,270	\$ (273,722)	\$ 1,347,548	
2	Columbus	[a] 368,299		368,299	(1,830)	366,469	2,563	369,032	(62,304)	306,728	
3	Consolidated Communications - KS	[b] -		-	-	-	-	-	-	-	
4	Consolidated Communications - MO	[c] -		-	-	-	-	-	-	-	
5	Craw-Kan	4,610,850		4,610,850	(26,955)	4,583,895	(1,654)	4,582,241	(773,629)	3,808,612	
6	Cunningham	867,975		867,975	(2,055)	865,920	(40)	865,880	(146,188)	719,692	
7	Elkhart	858		858	(1,257)	-	-	-	-	-	
8	Golden Belt	1,775,150		1,775,150	(6,687)	1,768,463	(297)	1,768,166	(298,523)	1,469,643	
9	Gorham	554,307		554,307	(1,095)	553,212	(9)	553,203	(93,398)	459,805	
10	H & B	690,547		690,547	(964)	689,583	(60)	689,523	(116,414)	573,109	
11	Haviland	[d] -		-	(3,855)	-	-	-	-	-	
12	Home	551,579		551,579	(3,978)	547,601	3,443	551,044	(93,034)	458,010	
13	JBN	613,964		613,964	(2,631)	611,333	(4,102)	607,231	(102,520)	504,711	
14	KanOkla	688,175		688,175	(2,421)	685,754	(72)	685,682	(115,765)	569,917	
15	LaHarpe	[e] -		-	(423)	-	-	-	-	-	
16	Madison	226,447		226,447	(855)	225,592	(14)	225,578	(38,085)	187,493	
17	Mokan	[f] -		-	-	-	-	-	-	-	
18	Moundridge	[g] -		-	(2,127)	-	-	-	-	-	
19	Mutual	219,058		219,058	(708)	218,350	(27)	218,323	(36,860)	181,463	
20	Peoples	487,928		487,928	(2,889)	485,039	(30)	485,009	(81,885)	403,124	
21	Pioneer	3,573,760		3,573,760	(13,338)	3,560,422	-	3,560,422	(601,113)	2,959,309	
22	Rainbow	[h] 778,561		778,561	(2,916)	775,645	(354)	775,291	(130,894)	644,397	
23	Rural	2,646,282		2,646,282	(12,870)	2,633,412	-	2,633,412	(444,604)	2,188,808	
24	S & A	347,266		347,266	(993)	346,273	-	346,273	(58,462)	287,811	
25	S & T	1,184,188		1,184,188	(3,903)	1,180,285	(41)	1,180,244	(199,263)	980,981	
26	South Central	2,112,581		2,112,581	(2,193)	2,110,388	(198)	2,110,190	(356,268)	1,753,923	
27	Southern Kansas	1,195,177		1,195,177	(3,825)	1,191,352	-	1,191,352	(201,138)	990,214	
28	Totah	469,657		469,657	(1,148)	468,509	-	468,509	(79,099)	389,410	
29	Tri-County	1,323,796		1,323,796	(5,589)	1,318,207	(490)	1,317,717	(222,473)	1,095,245	
30	Tri-County - Council Grove	967,175		967,175	(3,450)	963,725	(409)	963,316	(162,639)	800,677	
31	Twin Valley	3,504,480		3,504,480	(5,634)	3,498,846	-	3,498,846	(590,717)	2,908,129	
32	United Telephone Assoc.	1,601,801		1,601,801	(9,177)	1,592,624	(125)	1,592,499	(268,865)	1,323,634	
33	Wamego	1,599,137		1,599,137	(2,955)	1,596,182	-	1,596,182	(269,487)	1,326,695	
34	Wheat State	611,651		611,651	(2,889)	608,762	(522)	608,240	(102,690)	505,550	
35	Wilson	732,554		732,554	(1,827)	730,727	(11)	730,716	(123,368)	607,348	
36	Zenda	298,760		298,760	(366)	298,394	(0)	298,394	(50,378)	248,015	
	Total	\$ 36,221,727	\$ -	\$ 36,221,727	\$ (139,455)	\$ 36,089,076	\$ 4,712	\$ 36,093,788	\$ (6,093,788)	\$ 30,000,000	
	Statutory Cap	\$ 30,000,000		Total KUSF Impact		\$ 132,651					
	FY 29 KUSF Support	36,093,788									
	Remaining Headroom	\$ (6,093,788)									

Notes:

- [a] Company will begin to receive KUSF support in either January or February 2023. [Order Setting Procedural Schedule, June 2022; and Settlement Agreement, Docket 22-COST-546-KSF, Oct. 2022].
- [b] Company does not receive KUSF support [Docket Nos. 05-GIMT-094-GIT/06-FMCT-858-COC]. See also Docket No. 19-FMCT-161-CCN approving name change.
- [c] Company does not receive KUSF support [Order, Docket No. 01-SFLT-879-AUD, May 2, 2003]. See also Docket No. 19-SFLT-197-CCN approving name change.
- [d] Company does not receive KUSF support [Order, Docket No. 10-HVDT-288-KSF, Sept. 2010].
- [e] Company does not receive KUSF support, effective July 1, 2018 [Order, Docket No. 12-LHPT-875-AUD, June 26, 2013].
- [f] Company does not receive KUSF support [Order, Docket No. 04-MKNT-364-AUD, Jan. 12, 2004].
- [g] Company does not receive support [Order, Docket No. 15-MRGT-097-AUD, April 27, 2015].
- [h] Company will recover, in total, \$85,393, or \$17,079 annually, of audit expense, effective Dec. 31, 2022, with the Company's support decreasing effective January 2023. [Order, Docket No. 17-RNBT-555-KSF, Jan. 4, 2018].

LOCAL RESIDENTIAL RATES (YR. 29)				
Company	Res. Rate 10/1/2024[1]	Access Lines	Rate 3-1-25	Annual Revenue Increase (Yr. 29)
Target Rate-Residential	\$ 19.00			
Monthly Increase	\$ 0.25			
Maximum Increase	\$ 2.00			
Blue Valley	18.75	1,622	\$ 19.00	\$ 4,866
Columbus	18.75	194	19.00	582
Consolidated KS - Cedar Point, Saffordville, Americus	24.24 [a]	133	24.24	-
Leoti, Tribune, Marienthal, Sharon Springs, Wallace, Weskan,	20.77 [a]	430	20.77	-
Jetmore				
Consolidated MO	22.50 [a]	58	22.50	-
Craw-Kan	19.36	7,526	19.61	22,578
Cunningham	18.75	524	19.00	1,572
Elkhart	18.75	174	19.00	522
Golden Belt	20.25	1,527	20.50	4,581
Gorham	18.75	305	19.00	915
H&B Comm.	18.65	143	19.00	601
Haviland	18.75 [a]	999	19.00	2,997
Home	19.10	965	19.40	3,474
JBN	18.75	682	19.00	2,046
KanOkla	18.75	592	19.00	1,776
LaHarpe	18.75	118	19.00	354
Madison	18.75	205	19.00	615
MoKan	16.60 [a]	701	16.60	-
Moundridge	18.75	709	19.00	2,127
Mutual	18.75	167	19.00	501
Peoples	18.75	786	19.00	2,358
Pioneer	20.50	1,833	20.75	5,499
Rainbow	18.75	835	19.00	2,505
Rural	18.75	4,230	19.00	12,690
S&A	18.75	279	19.00	837
S&T	18.75	881	19.00	2,643
South Central KS	18.75	537	19.00	1,611
Southern KS	18.75	508	19.00	1,524
Southern KS - Clearwater	26.70	447	26.95	1,341
Totah	19.10	388	19.32	1,024
Tri-County	18.75	1,518	19.00	4,554
Tri-County - Council Grove Study Area	18.75	588	19.00	1,764
Twin Valley - RG 1 - 3	18.75	1,752	19.00	5,256
United Tele. Assoc.	19.75	2,135	20.00	6,405
Wamego	18.75	558	19.00	1,674
Wheat State	18.75	812	19.00	2,436
Wilson	18.75	397	19.00	1,191
Zenda	18.75	102	19.00	306
TOTAL		36,360	\$	105,725

[a] Company has increased residential and/or business local rates up to \$1.50 per line per year pursuant to K.S.A. 66-2007(b), thus, pursuant to K.S.A. 66-2005, the Company's affordable rate is equal to the statewide affordable rate plus the amount of rate rebalancing implemented under K.S.A. 66-2007(b).

LOCAL BUSINESS RATES (FY 29)		Access	Rate	Annual Revenue
Company	Bus. Rate 10/1/2024	Lines	3/1/2025	Increase
Target Rate-Business	\$ 22.00			
Maximum Increase	\$ 2.00			
Blue Valley	21.75	262	\$ 22.00	\$ 786
Columbus	21.75	416	22.00	1,248
Consolidated KS - Americus	27.00	20	27.00	-
Cedar Point & Saffordville	25.50	5	25.50	-
Leoti, Tribune, Marienthal, Sharon Springs, Wallace, Weskan,	21.00	741	21.00	-
Jetmore				
Consolidated MO	22.50	20	22.50	-
Craw-Kan	22.36	1,459	22.61	4,377
Cunningham	21.75	161	22.00	483
Elkhart	21.75	245	22.00	735
Golden Belt	23.25	702	23.50	2,106
Gorham	21.75	60	22.00	180
H&B Comm.	21.75	121	22.00	363
Haviland	21.75	286	22.00	858
Home	19.10	140	19.40	504
JBN	21.75	195	22.00	585
KanOkla	21.75	215	22.00	645
LaHarpe	21.75	23	22.00	69
Madison	21.75	80	22.00	240
MoKan	19.60	363	19.60	-
Moundridge	21.75	-	22.00	-
Mutual	21.75	69	22.00	207
Peoples	21.75	177	22.00	531
Pioneer	20.50	2,613	20.75	7,839
Rainbow	21.75	137	22.00	411
Rural	21.50	30	22.00	180
S&A	21.75	52	22.00	156
S&T	21.75	420	22.00	1,260
South Central KS	21.75	194	22.00	582
Southern KS	21.75	172	22.00	516
Southern KS - Clearwater	36.70	148	36.95	444
Totah	19.10	47	19.32	124
Tri-County	21.75	345	22.00	1,035
Tri-County - Council Grove Study Area	21.75	562	22.00	1,686
Twin Valley	21.75	126	22.00	378
United Tele. Assoc.	19.75	924	20.00	2,772
Wamego	21.75	427	22.00	1,281
Wheat State	21.75	151	22.00	453
Wilson	21.75	212	22.00	636
Zenda	21.75	20	22.00	60
TOTAL		12,340	\$	33,730

Company Total FY 29 Revenue Increase				
Company		Res.	Bus.	Total
Blue Valley		4,866	786	5,652
Columbus		582	1,248	1,830
Consolidated KS		-	-	-
Consolidated MO		-	-	-
Craw-Kan		22,578	4,377	26,955
Cunningham		1,572	483	2,055
Elkhart		522	735	1,257
Golden Belt		4,581	2,106	6,687
Gorham		915	180	1,095
H&B Comm.		601	363	964
Haviland		2,997	858	3,855
Home		3,474	504	3,978
JBN		2,046	585	2,631
KanOkla		1,776	645	2,421
LaHarpe		354	69	423
Madison		615	240	855
MoKan		-	-	-
Moundridge		2,127	-	2,127
Mutual		501	207	708
Peoples		2,358	531	2,889
Pioneer		5,499	7,839	13,338
Rainbow		2,505	411	2,916
Rural		12,690	180	12,870
S&A		837	156	993
S&T		2,643	1,260	3,903
South Central KS		1,611	582	2,193
Southern KS		2,865	960	3,825
Totah		1,024	124	1,148
Tri-County		4,554	1,035	5,589
Tri-County Council Grove Study Area		1,764	1,686	3,450
Twin Valley		5,256	378	5,634
United Tele. Assoc.		6,405	2,772	9,177
Wamego		1,674	1,281	2,955
Wheat State		2,436	453	2,889
Wilson		1,191	636	1,827
Zenda		306	60	366
GRAND TOTAL		\$ 105,725	\$ 33,730	\$ 139,455

Less: Revenue for companies not receiving KUSF Support

(6,804)

KUSF Impact

\$ 132,651

KUSF Support Pro-Rate Calculations - March 2025 - Feb. 2026 (FY 29)

Total Annual Support Payable	\$ 36,093,788
Statutory Cap	30,000,000
Annual KUSF Support Adjustment	\$ (6,093,788)

Line	Company	FY 29 Unadjusted	Pro-Rated	Pro-Rated Annual	Total KUSF	Monthly KUSF	Monthly Pro-
		Annual KUSF	Percentage / KUSF Support	KUSF Support	Support Adjustment	Support Adjustment	Rata KUSF Support
		(A)	(B)	(C = B x \$30 Mil)	(D = C - A)	(E = D / 12)	(F = C / 12)
1	Blue Valley	\$ 1,621,270	4.49%	\$ 1,347,548	\$ (273,722)	\$ (22,810)	\$ 112,296
2	Columbus	\$ 369,032	1.02%	306,728	(62,304)	(5,192)	25,561
3	Consolidated Communications KS	\$ -	0.00%	-	-	-	-
4	Consolidated Communications MO	\$ -	0.00%	-	-	-	-
5	Craw-Kan	\$ 4,582,241	12.70%	3,808,612	(773,629)	(64,469)	317,384
6	Cunningham	\$ 865,880	2.40%	719,692	(146,188)	(12,182)	59,974
7	Elkhart	\$ -	0.00%	-	-	-	-
8	Golden Belt	\$ 1,768,166	4.90%	1,469,643	(298,523)	(24,877)	122,470
9	Gorham	\$ 553,203	1.53%	459,805	(93,398)	(7,783)	38,317
10	H & B	\$ 689,523	1.91%	573,109	(116,414)	(9,701)	47,759
11	Haviland	\$ -	0.00%	-	-	-	-
12	Home	\$ 551,044	1.53%	458,010	(93,034)	(7,753)	38,167
13	JBN	\$ 607,231	1.68%	504,711	(102,520)	(8,543)	42,059
14	KanOkla	\$ 685,682	1.90%	569,917	(115,765)	(9,647)	47,493
15	LaHarpe	\$ -	0.00%	-	-	-	-
16	Madison	\$ 225,578	0.62%	187,493	(38,085)	(3,174)	15,624
17	Mokan	\$ -	0.00%	-	-	-	-
18	Moundridge	\$ -	0.00%	-	-	-	-
19	Mutual	\$ 218,323	0.60%	181,463	(36,860)	(3,072)	15,122
20	Peoples	\$ 485,009	1.34%	403,124	(81,885)	(6,824)	33,594
21	Pioneer	\$ 3,560,422	9.86%	2,959,309	(601,113)	(50,093)	246,609
22	Rainbow	\$ 775,291	2.15%	644,397	(130,894)	(10,908)	53,700
23	Rural	\$ 2,633,412	7.30%	2,188,808	(444,604)	(37,050)	182,401
24	S & A	\$ 346,273	0.96%	287,811	(58,462)	(4,872)	23,984
25	S & T	\$ 1,180,244	3.27%	980,981	(199,263)	(16,605)	81,748
26	South Central	\$ 2,110,190	5.85%	1,753,923	(356,268)	(29,689)	146,160
27	Southern Kansas	\$ 1,191,352	3.30%	990,214	(201,138)	(16,762)	82,518
28	Totah	\$ 468,509	1.30%	389,410	(79,099)	(6,592)	32,451
29	Tri-County	\$ 1,317,717	3.65%	1,095,245	(222,473)	(18,539)	91,270
30	Tri-County - Council Grove	\$ 963,316	2.67%	800,677	(162,639)	(13,553)	66,723
31	Twin Valley	\$ 3,498,846	9.69%	2,908,129	(590,717)	(49,226)	242,344
32	United Telephone Assoc.	\$ 1,592,499	4.41%	1,323,634	(268,865)	(22,405)	110,303
33	Wamego	\$ 1,596,182	4.42%	1,326,695	(269,487)	(22,457)	110,558
34	Wheat State	\$ 608,240	1.69%	505,550	(102,690)	(8,558)	42,129
35	Wilson	\$ 730,716	2.02%	607,348	(123,368)	(10,281)	50,612
36	Zenda	\$ 298,394	0.83%	248,015	(50,378)	(4,198)	20,668
Total		\$ 36,093,788	100.00%	\$ 30,000,000	\$ (6,093,788)	\$ (507,816)	\$ 2,500,000

Company	Monthly KUSF Support					7/1/2025 Access Revenue							Cumulative Feb. 2026	
	(03/1/25)	Mar-25	Apr-25	May-25	Jun-25	Adjustment	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	(Pro-Rated)
Blue Valley	\$ 111,699	\$ 111,699	\$ 223,398	\$ 335,097	\$ 446,797	\$ 112,594	\$ 559,391	\$ 671,984	\$ 784,578	\$ 897,172	\$ 1,009,766	\$ 1,122,360	\$ 1,234,954	\$ 1,347,548
Columbus	25,347	25,347	50,694	76,041	101,388	25,667	127,056	152,723	178,391	204,058	229,725	255,393	281,060	306,728
Consolidated Communications KS	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Consolidated Communications MO	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Craw-Kan	317,522	317,522	635,044	952,567	1,270,089	317,315	1,587,404	1,904,720	2,222,035	2,539,350	2,856,666	3,173,981	3,491,297	3,808,612
Cunningham	59,978	59,978	119,955	179,933	239,911	59,973	299,883	359,856	419,829	479,801	539,774	599,747	659,719	719,692
Elkhart	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Golden Belt	122,495	122,495	244,990	367,485	489,980	122,458	612,438	734,896	857,354	979,812	1,102,270	1,224,727	1,347,185	1,469,643
Gorham	38,318	38,318	76,636	114,953	153,271	38,317	191,588	229,905	268,221	306,538	344,855	383,171	421,488	459,805
H & B	47,764	47,764	95,528	143,292	191,056	47,757	238,813	286,570	334,326	382,083	429,839	477,596	525,353	573,109
Haviland	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Home	37,881	37,881	75,761	113,642	151,522	38,311	189,833	228,144	266,455	304,766	343,077	381,388	419,699	458,010
JBN	42,401	42,401	84,802	127,203	169,604	41,888	211,493	253,381	295,269	337,158	379,046	420,934	462,823	504,711
KanOkla	47,499	47,499	94,998	142,497	189,996	47,490	237,486	284,976	332,466	379,956	427,446	474,936	522,426	569,916
LaHarpe	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Madison	15,626	15,626	31,251	46,877	62,502	15,624	78,126	93,750	109,374	124,998	140,622	156,246	171,869	187,493
Mokan	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Moundridge	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mutual	15,124	15,124	30,248	45,373	60,497	15,121	75,618	90,738	105,859	120,980	136,101	151,222	166,343	181,463
Peoples	33,596	33,596	67,192	100,788	134,385	33,592	167,977	201,570	235,162	268,754	302,347	335,939	369,532	403,124
Pioneer	246,609	246,609	493,218	739,827	986,436	246,609	1,233,045	1,479,654	1,726,263	1,972,872	2,219,482	2,466,091	2,712,700	2,959,309
Rainbow	53,729	53,729	107,458	161,188	214,917	53,685	268,602	322,287	375,972	429,657	483,342	537,027	590,712	644,397
Rural	182,401	182,401	364,801	547,202	729,603	182,401	912,003	1,094,404	1,276,804	1,459,205	1,641,606	1,824,006	2,006,407	2,188,808
S & A	23,984	23,984	47,969	71,953	95,937	23,984	119,921	143,906	167,890	191,874	215,858	239,843	263,827	287,811
S & T	81,752	81,752	163,504	245,255	327,007	81,747	408,754	490,501	572,247	653,994	735,741	817,488	899,234	980,981
South Central	146,177	146,177	292,353	438,530	584,707	146,152	730,859	877,011	1,023,163	1,169,315	1,315,467	1,461,619	1,607,771	1,753,923
Southern Kansas	82,518	82,518	165,036	247,553	330,071	82,518	412,589	495,107	577,625	660,142	742,660	825,178	907,696	990,214
Totah	32,451	32,451	64,902	97,352	129,803	32,451	162,254	194,705	227,156	259,606	292,057	324,508	356,959	389,410
Tri-County	91,311	91,311	182,622	273,934	365,245	91,250	456,495	547,745	638,995	730,245	821,495	912,745	1,003,995	1,095,245
Tri-County - Council Grove Study Area	66,757	66,757	133,514	200,272	267,029	66,706	333,735	400,441	467,147	533,853	600,559	667,265	733,971	800,677
Twin Valley	242,344	242,344	484,688	727,032	969,376	242,344	1,211,720	1,454,064	1,696,408	1,938,752	2,181,097	2,423,441	2,665,785	2,908,129
United Tel. Assoc.	110,313	110,313	220,627	330,940	441,253	110,298	551,551	661,848	772,146	882,444	992,741	1,103,039	1,213,337	1,323,634
Wamego	110,558	110,558	221,116	331,674	442,232	110,558	552,790	663,348	773,906	884,464	995,021	1,105,579	1,216,137	1,326,695
Wheat State	42,173	42,173	84,345	126,518	168,691	42,107	210,798	252,905	295,013	337,120	379,228	421,335	463,442	505,550
Wilson	50,613	50,613	101,226	151,840	202,453	50,612	253,065	303,677	354,289	404,900	455,512	506,124	556,736	607,348
Zenda	20,668	20,668	41,336	62,004	82,672	20,668	103,340	124,008	144,676	165,344	186,012	206,679	227,347	248,015
Total	\$ 2,499,607	\$ 2,499,607	\$ 4,999,215	\$ 7,498,822	\$ 9,998,430	\$ 2,500,196	\$ 12,498,626	\$ 14,998,822	\$ 17,499,018	\$ 19,999,215	\$ 22,499,411	\$ 24,999,607	\$ 27,499,803	\$ 30,000,000
Monthly Support		\$ 2,499,607	\$ 2,499,607	\$ 2,499,607	\$ 2,499,607		\$ 2,500,196	\$ 2,500,196	\$ 2,500,196	\$ 2,500,196	\$ 2,500,196	\$ 2,500,196	\$ 2,500,196	\$ 2,500,196

**Brightspeed Companies of Kansas d/b/a Brightspeed KS00001411
KUSF Support Calculation Worksheet
Effective As Of 3/1/2025 Data Month
Fiscal Year 2025/2026**

Description		Annual	Monthly
<u>Brightspeed of Eastern/South Central SAC 411317</u>			
Gross KUSF	\$ 3,703,455		
Less: Federal Offset (N/A)	-		
Net KUSF: United of Eastern/South Central SAC		\$ 3,703,455	\$ 308,621
<u>Brightspeed of Kansas SAC 411842</u>			
Gross KUSF	\$ 1,010,107		
Less: Federal Offset (N/A)	-		
Net KUSF: United of Kansas SAC		1,010,107	84,176
<u>Brightspeed of West Missouri SAC 411957</u>			
Gross KUSF	\$ 53,692		
Less: Federal Offset (N/A)	-		
Net KUSF: United of MO SAC		53,692	4,474
Net Cost-Based KUSF Support Payable to Company		\$ 4,767,254	\$ 397,271
Plus: Access revenue Recovery-Docket No. 08-1023		249,998	20,833
Total Adjusted KUSF Support Payable to Company		\$ 5,017,252	\$ 418,104

Assessment Rate 12.15%

Lifeline \$ 7.77

Per HB 2201, KUSF Support Capped at: KUSF Support, as of 2/28/2013	\$ -
	\$ 13,279,541
	90%
	\$ 11,951,587
Or, Lesser of, or Cap	\$ 11,400,000

			As of September 30, 2024						
			ZONE 1			ZONE 2			
			Wire Center	Wire Center CLLI	Study Area	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines
Alta Vista	ALTVKSXA	Eastern		\$ 18.19			\$ 100.01		
Altoona	ALNAKSXA	Eastern		\$ 21.80			\$ 91.96		
Belle Plaine	BLLPKSXA	Eastern		\$ -			\$ 31.13		
Benedict	BNDCKSXA	Eastern		\$ -			\$ 117.03		
Blue Mound	BLMNKSXA	Eastern		\$ 40.47			\$ 114.80		
Bucyrus	BCYRKSXA	Eastern		\$ -			\$ 39.07		
Buffalo	BFLOKSXA	Eastern		\$ -			\$ 70.97		
Centropolis	CNTRKSXA	Eastern		\$ -			\$ 69.73		
Circleville	CRVLKSXA	Eastern		\$ 34.46			\$ 90.67		
Conway	CNWKYSXA	Eastern		\$ -			\$ 98.49		
Coyville	CYVLKSXA	Eastern		\$ -			\$ 88.71		
Delia	DELIKSA	Eastern		\$ -			\$ 84.53		
Denison	DESNKSXA	Eastern		\$ 29.99			\$ 84.00		
Durham	DRHMKSXA	Eastern		\$ -			\$ 103.19		
Easton	ESTNKSXA	Eastern		\$ 7.74			\$ 43.71		
Edgerton	EGTNKSXA	Eastern		\$ -			\$ 21.98		
Effingham	EFHMKSXA	Eastern		\$ 4.01			\$ 59.56		
Emmett	EMMTKSXA	Eastern		\$ 39.17			\$ 93.49		
Fall River	FLRVKSXA	Eastern		\$ -			\$ 68.10		
Fontana	FNTAKSXA	Eastern		\$ -			\$ 47.58		
Gardner	GRNRKSXA	Eastern		\$ -			\$ 3.08		
Greeley	GRELKSXA	Eastern		\$ 8.04			\$ 66.26		
Gridley	GRDLKSXA	Eastern		\$ 14.80			\$ 109.86		
Harveyville	HVVLKSXA	Eastern		\$ 24.75			\$ 82.47		
Hesston	HETNKSXA	Eastern		\$ -			\$ 17.30		
Hoyt	HOYTKSXA	Eastern		\$ 5.81			\$ 45.96		
Inman	INMNKSXA	Eastern		\$ -			\$ 42.76		
Lafontaine	LFNTKSXA	Eastern		\$ -			\$ 125.45		
Lancaster	LNCSKSXA	Eastern		\$ 4.09			\$ 51.05		
Lane	LANEKSXA	Eastern		\$ -			\$ 32.96		
Lebo	LEBOKSXA	Eastern		\$ 2.99			\$ 77.37		
Lehigh	LHGHKSXA	Eastern		\$ 41.68			\$ 117.10		
LeRoy	LERYSXA	Eastern		\$ 17.48			\$ 111.73		
Linwood	LNWDKSXA	Eastern		\$ 8.12			\$ 29.30		
Mapleton	MPTNKSXA	Eastern		\$ -			\$ 93.54		
Mayetta	MYTTKSXA	Eastern		\$ 16.87			\$ 51.20		
Mc Louth	MCLTKSXA	Eastern		\$ 3.77			\$ 50.21		
Meriden	MRDNKSXA	Eastern		\$ 1.17			\$ 28.18		
Michigan Valley	MCVYKSXA	Eastern		\$ -			\$ 86.39		
Mound City	MDCYKSXA	Eastern		\$ 1.71			\$ 53.47		
Neosho Falls	NSFLKSXA	Eastern		\$ -			\$ 93.55		
Nortonville	NRVLKSXA	Eastern		\$ 5.83			\$ 57.07		

			As of September 30, 2024					
			ZONE 1			ZONE 2		
Wire Center	Wire Center CLLI	Study Area	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Osage City	OSCYKSXA	Eastern		\$ -			\$ 37.89	
Overbrook	OVBKKSXA	Eastern		\$ 1.30			\$ 54.24	
Oxford	OXFRKSXA	Eastern		\$ -			\$ 49.26	
Ozawkie	OZWKKSXA	Eastern		\$ 7.56			\$ 38.45	
Parker	PRKRKSXA	Eastern		\$ 12.16			\$ 67.36	
Perry	PRRYKSXA	Eastern		\$ 0.15			\$ 36.68	
Piqua	PIQUKSXA	Eastern		\$ -			\$ 117.23	
Princeton	PRTNKSXA	Eastern		\$ 8.28			\$ 67.05	
Quincy	QNCYKSXA	Eastern		\$ -			\$ 243.23	
Richmond	RCMDKSXA	Eastern		\$ 9.84			\$ 69.69	
Rossville	ROVLKSXA	Eastern		\$ -			\$ 45.52	
Silver Lake	SLLKKSXA	Eastern		\$ -			\$ 27.20	
Spring Hill	SPHLKSXA	Eastern		\$ 0.41			\$ 21.46	
Saint Marys	STMYKSXA	Eastern		\$ -			\$ 15.95	
Thayer	THYRKSXA	Eastern		\$ 11.90			\$ 75.96	
Toronto	TOROKSXA	Eastern		\$ 14.09			\$ 80.33	
Walton	WLTNKSXA	Eastern		\$ 12.47			\$ 70.57	
Wellsville	WLVLSXA	Eastern		\$ -			\$ 41.21	
Winchester	WNCHKXSXA	Eastern		\$ 1.11			\$ 60.84	
Windom	WNDMKSXA	Eastern		\$ -			\$ 60.58	
Abbyville	ABVLKSXA	S. Central		\$ -			\$ 59.22	
Alden	ALDNKSXA	S. Central		\$ 27.44			\$ 45.06	
Arlington	ARTNKSXA	S. Central		\$ 10.55			\$ 71.51	
Belpre	BLPRKSXA	S. Central		\$ -			\$ 72.04	
Clafin	CLFLKSXA	S. Central		\$ 6.34			\$ 75.04	
Cunningham	CNHMKXSXA	S. Central		\$ 15.68			\$ 109.55	
Hoisington	HSTNKSXB	S. Central		\$ -			\$ 49.76	
Hudson	HDSNKSXA	S. Central		\$ -			\$ 57.73	
Langdon	LNGDKSXA	S. Central		\$ -			\$ 67.61	
Macksville	MCVLKSXA	S. Central		\$ -			\$ 43.76	
Murdock	MRDCKSXA	S. Central		\$ -			\$ 92.68	
Partridge	PRRGKSXA	S. Central		\$ 13.29			\$ 64.25	
Preston	PSTNKSXA	S. Central		\$ -			\$ 87.12	
Pretty Prairie	PRPRKSXA	S. Central		\$ 9.13			\$ 70.83	
Saint John	STJHKXSXA	S. Central		\$ 0.42			\$ 73.11	
Sterling	STNGKSXA	S. Central		\$ -			\$ 33.26	
Sylvia	SYLVKSXA	S. Central		\$ -			\$ 48.80	
Total					\$ 180,451.44			\$ 3,523,003.92
Riverton	RVTNKSXA	South East		\$ 5.38			\$ 36.70	
Scammon	SCMNKSXA	South East		\$ 2.06			\$ 28.18	
					\$ 6,183.60			\$ 47,508.00

			As of September 30, 2024					
			ZONE 1			ZONE 2		
Wire Center	Wire Center CLLI	Study Area	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Alma	ALMAKSXA	United		\$ -			\$ 63.41	
Altamont	ALMTKSXA	United		\$ 0.82			\$ 57.60	
Baldwin	BLDWKSXA	United		\$ -			\$ 20.81	
Buhler	BHLRKSXA	United		\$ -			\$ 26.31	
Burlingame	BRLNKSXA	United		\$ -			\$ 27.66	
Burlington	BURLKSXA	United		\$ -			\$ 32.11	
Burrton	BRRTKSXA	United		\$ 9.41			\$ 82.62	
Ellinwood	ELLNKSXA	United		\$ -			\$ 37.54	
Eskridge	ESRGKSXA	United		\$ -			\$ 95.25	
Fredonia	FRDNKSXA	United		\$ -			\$ 4.78	
Garnett	GRNTKSXA	United		\$ -			\$ 21.33	
Haven	HVENKSXA	United		\$ -			\$ 9.16	
Highland	HGLDKSXA	United		\$ -			\$ 21.49	
Hillsboro	HLBOKSXA	United		\$ -			\$ 13.26	
Kincaid	KNCDKSXA	United		\$ -			\$ 54.52	
Lyndon	LYNDKSXA	United		\$ -			\$ 28.81	
Melvern	MLVRKSXA	United		\$ -			\$ 60.74	
Moran	MORNKSXA	United		\$ 7.46			\$ 72.61	
Morrill	MORLKSXA	United		\$ -			\$ 36.76	
Mound Valley	MNVYKSXA	United		\$ 15.01			\$ 78.78	
Oskaloosa	OSKLSXA	United		\$ -			\$ 26.07	
Oswego	OSWGKSXA	United		\$ -			\$ 24.81	
Pomona	POMNKSXA	United		\$ -			\$ 28.28	
Powhattan	PWHTKSXA	United		\$ -			\$ 51.81	
Quenemo	QUNMKSXA	United		\$ -			\$ 111.32	
Troy	TROYKSXA	United		\$ -			\$ 45.65	
Valley Falls	VFLKSXA	United		\$ -			\$ 26.42	
Wathena	WTHNKSXA	United		\$ 2.68			\$ 45.16	
Waverly	WVRLKSXA	United		\$ 1.12			\$ 84.23	
Westphalia	WPHLSXA	United		\$ -			\$ 75.84	
White Cloud	WHCLKSXA	United		\$ 14.45			\$ 69.22	
					\$ 19,228.44			\$ 990,878.76
Subtotal					\$ 205,863.48			\$ 4,561,391
Total Company						10,934		\$ 4,767,254

KUSF Year 27 (Eff. 3/1/2023)				
Year 26 - 27 Access True-Up				
12-Month Volumes 9/30/2022		\$	338,500	
Monthly Support		\$	28,208	
KUSF Per 9/30/2023 Volumes		\$	267,070	
Monthly Support		\$	22,256	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-22	\$ 29,127	\$ 22,256	\$ (6,872)	
Nov-22	29,127	22,256	(6,872)	
Dec-22	29,127	22,256	(6,872)	
Jan-23	29,127	22,256	(6,872)	
Feb-23	29,127	22,256	(6,872)	
Mar-23	19,786	22,256	2,469	
Apr-23	19,786	22,256	2,469	
May-23	19,786	22,256	2,469	
Jun-23	19,786	22,256	2,469	
Jul-23	19,786	22,256	2,469	
Aug-23	19,786	22,256	2,469	
Sep-23	19,786	22,256	2,469	
Annual Total	\$ 284,141	\$ 267,070	\$ (17,072)	
Mar 23 Estimate	\$	338,500		
Year 26 True-Up	\$	(101,063)		
Adjusted Payable	\$	237,436		
Monthly	\$	19,786		

KUSF Year 28 (Eff. 3/1/2024)				
Year 27 - 28 Access True-Up				
12-Month Volumes 9/30/2023		\$	267,070	
Monthly Support		\$	22,256	
KUSF Per 9/30/2024 Volumes		\$	410,652	
Monthly Support		\$	34,221	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-23	\$ 19,786	\$ 34,221	\$ 14,435	
Nov-23	19,786	34,221	14,435	
Dec-23	19,786	34,221	14,435	
Jan-24	19,786	34,221	14,435	
Feb-24	19,786	34,221	14,435	
Mar-24	20,833	34,221	13,388	
Apr-24	20,833	34,221	13,388	
May-24	20,833	34,221	13,388	
Jun-24	20,833	34,221	13,388	
Jul-24	20,833	34,221	13,388	
Aug-24	20,833	34,221	13,388	
Sep-24	20,833	34,221	13,388	
Annual Total	\$ 244,764	\$ 410,652	\$ 165,888	
Mar 24 Estimate	\$	267,070		
Year 27 True-Up	\$	(17,072)		
Adjusted Payable	\$	249,998		
Monthly	\$	20,833		

KUSF Year 29 (Eff. 3/1/2025)				
Year 28 - 29 Access True-Up				
12-Month Volumes 9/30/2024		\$	410,652	
Monthly Support		\$	34,221	
KUSF Per 9/30/2025 Volumes		\$	-	
Monthly Support		\$	-	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-24	\$ 20,833			
Nov-24	20,833			
Dec-24	20,833			
Jan-25	20,833			
Feb-25	20,833			
Mar-25	48,045			
Apr-25	48,045			
May-25	48,045			
Jun-25	48,045			
Jul-25	48,045			
Aug-25	48,045			
Sep-25	48,045			
Annual Total	\$ 440,480	\$ -	\$ -	
Mar 25 Estimate	\$	410,652		
Year 28 True-Up	\$	165,888		
Adjusted Payable	\$	576,539		
Monthly	\$	48,045		

KUSF Year 30 (Eff. 3/1/2026)				
Year 29 - 30 Access True-Up				
12-Month Volumes 9/30/2025		\$	-	
Monthly Support		\$	-	
KUSF Per 9/30/2026 Volumes		\$	-	
Monthly Support		\$	-	
Month:	Subsidy Paid	Subsidy Actual	Difference	
Oct-25	\$ 48,045			
Nov-25	48,045			
Dec-25	48,045			
Jan-26	48,045			
Feb-26	48,045			
Mar-26				
Apr-26				
May-26				
Jun-26				
Jul-26				
Aug-26				
Sep-26				
Annual Total	\$ 240,225	\$ -	\$ -	
Mar 26 Estimate	\$	-		
Year 29 True-Up	\$	-		
Adjusted Payable	\$	-		
Monthly	\$	-		

KUSF FY 29
Telecommunications Relay Service and
Access Program Funding

Activity Month Data Month	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Total	Monthly Average	FY 28 Annualized
	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24			
Dual Party Relay Service DPRS):											
T-Mobile Dual Party Relay Services [a]	\$ 9,772	\$ 9,208	\$ 9,345	\$ 9,031	\$ 11,480	\$ 32,527	\$ 26,145	\$ 11,688	\$ 119,195	\$ 14,899	\$ 178,792
DPRS Administration [b]	8,282			\$ 4,049			\$ 5,758		\$ 18,089	\$ 3,015	\$ 36,179
Total Relay	\$ 18,054	\$ 9,208	\$ 9,345	\$ 13,079	\$ 11,480	\$ 32,527	\$ 31,904	\$ 11,688	\$ 137,284	\$ 17,161	\$ 214,971

Per minute rate	
2024	\$ 3.71
2025	4.28
Annual Increase	15.36%

DPRS - T- Mobile FY 28 Annualized	\$ 178,792
Usage Increase	27,469
FY 29 Projected	\$ 206,262

Budgeted FY 29 DPRS Costs

T-Mobile DPRS	\$ 206,262
Administration Costs [Feb. 15, 2019 Contract]	23,794
Total DPRS FY 29	\$ 230,056

Activity Month Data Month	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Total	Monthly Average	FY 28 Annualized
	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24			
Telecommunications Access Program:											
Assistive Technologies of Kansas - Admin. [a] (2024 -2025)	\$ 116,926			\$ 23,786			\$ 41,203		\$ 181,916	22,739	
TAP Equipment	4,902	4,296	3,481	4,798	3,135	5,073	10,616	4,145	40,445	5,056	\$ 60,668
Total	\$ 121,828	\$ 4,296	\$ 3,481	\$ 28,584	\$ 3,135	\$ 5,073	\$ 51,820	\$ 4,145	\$ 222,361	\$ 27,795	\$ 60,668

Budgeted FY 29 TAP Costs

Administration (FY 3/25 - 2/26)	\$ 226,468
TAP Equipment	60,668
Total TAP FY 29	\$ 287,136

Notes:
[a] Contract is available at: https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL.
Agency Name is Corporation Commission, Supplier Name is UNIV of Kansas

Line	Description		
1	8-Month Average KLSP Credits (from line 7)	\$	9,049
2	Projected Line Growth (Decline)	1.0%	
3	Estimated Line Growth		90
4	Projected FY 29 KLSP Funding (line 1 + 3)	\$	9,140
5	FY 29 KLSP Funding [line 4 x 12]	\$	<u>109,676</u>

Analysis of FY 28 Disbursements

			Change in No. Lines	Percent Line Change	Funding Change
6	KLSP Credits - March - Oct. 2024 Total (Attach D, p. 2)	\$ 72,393			
7	KLSP Credits - 8 Months' Average	\$ 9,049	Comparison of FY 28 Annualized 8 Month's	(326)	-21.89%
8	Equivalent No. of Lines supported (\$7.77/line)/Month	1,165	Average to FY 27	(line 8 - line 20)	
9	Annualized KLSP Credits	\$ <u>108,590</u>			\$ (30,439) (line 9 - line 18)
10	KLSP Credits - May - Oct. 2024 Total (Attach D, p. 2)	\$ 52,308			
11	KLSP Credits - 6 Months' Average	\$ 8,718	Comparison of FY 28 Annualized 6 Month's	(369)	-24.75%
12	Equivalent No. of Lines supported (\$7.77/line)	1,122	Average to FY 27	(line 12 - line 20)	
13	Annualized KLSP Credits	\$ <u>104,615</u>			\$ (34,414) (line 13 - line 18)
14	KLSP Credits - Aug. - Oct. 2024 Total (Attach D, p. 2)	\$ 25,214			
15	KLSP Credits - 3 Months' Average	\$ 8,405	Comparison of FY 28 Annualized 3 Month's	(409)	-27.46%
16	Equivalent No. of Lines supported (\$7.77/line)	1,082	Average to FY 27	(line 16 - line 20)	
17	Annualized KLSP Credits	\$ <u>100,855</u>			\$ (38,174) (line 17 - line 18)

Analysis of FY 25 - 27 Growth

			Change in Supported Lines	Line Change Percentage	Funding Change	2 Year Average Line Change	Average 2-Year Percentage Change
18	KLSP credits as of Feb. 2024 (FY 27) [a]	[a] \$ 139,029					
19	Average KLSP credits per month	<u>11,586</u>					
20	Equivalent No. of Lines supported (\$7.77/line)	<u>1,491</u>	Estimated FY 27 - FY 28	(326)	-21.89%	\$ (30,439)	(314) -19.38%
21	KLSP credits as of Feb. 2023 (FY 26) [a]	[b] \$ 167,234	(Line 7 - line 19)				
22	Average KLSP credits per month	<u>13,936</u>					
23	Equivalent No. of Lines supported (\$7.77/line)	<u>1,794</u>	FY 26 - FY 27 (Line 19 - line 22)	(302)	-16.87%	\$ (28,205)	(468) -21.49%
24	KLSP credits as of Feb. 2022 (FY 25) [a]	[c] \$ 226,317					
25	Average KLSP credits per month	<u>18,860</u>	FY 25 - FY 26	(634)	-26.11%	\$ (59,083)	
26	Equivalent No. of Lines supported (\$7.77/line)	<u>2,427</u>					

Notes:

- [a] KUSF Financial Statements for the Year Ended Feb. 28, 2024, Note 3, Docket No. 23-GIMT-261-GIT, Oct. 1, 2024.
- [b] KUSF Financial Statements for the Year Ended Feb. 28, 2023, Note 3, Docket No. 22-GIMT-142-GIT, Dec. 14, 2023.
- [c] KUSF Financial Statements for the Year Ended Feb. 28, 2022, Note 3, Docket No. 21-GIMT-095-GIT, Sept. 8, 2022.

KUSF FY 29
Kansas Lifeline Service
Program (KLSP) Funding

Company Name	Activity Month	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Total				
	Data Month	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24					
Blue Valley Tele-Communications Inc	\$	148	\$	140	\$	140	\$	140	\$	132	\$	132	\$	1,103
Blue Valley Technologies Inc.		47		47		47		39		39		31		311
Columbus Communication Services LLC		31		23		23		31		31		39		241
Tri-County Telephone-Council Grove Study Area		109		78		78		78		47		47		528
Craw-Kan Telephone Co-op Inc		1,142		1,173		1,204		1,026		1,041		1,057		979
Cunningham Telephone Company Inc		218		194		210		218		202		194		194
Elkhart Telephone Company		16		16		16		16		16		16		16
Golden Belt Telephone Association Inc		365		412		404		210		319		280		280
Gorham Telephone Company		117		117		117		117		117		117		117
H & B Communications Inc		8		-		-		-		8		8		8
Haviland Telephone Company		225		233		241		210		210		210		225
Home Telephone Co Inc		39		39		31		31		31		31		31
JBN Telephone Company Inc		109		109		109		109		93		93		93
KanOkla Telephone Association		194		210		218		210		210		210		210
LaHarpe Telephone Co., Inc.		241		225		225		210		124		124		124
Madison Telephone LLC		23		8		16		16		16		16		16
Mokan Dial Inc		117		117		117		117		101		109		93
Moundridge Telephone Company		78		78		78		78		70		62		62
Mutual Telephone Company		16		16		16		8		8		8		8
Peoples Telecommunications, LLC		171		155		163		171		171		171		171
Pioneer Telephone Association Inc		179		179		124		132		148		148		155
Rainbow Telecommunications Association Inc		85		70		78		85		93		93		93
Rural Telephone Service Co Inc dba Nex-Tech		171		171		171		171		163		132		171
S & A Telephone Company Inc		179		62		62		62		70		70		70
S & T Telephone Coop Assn		70		85		85		85		70		70		70
S&T COMMUNICATIONS, LLC		225		233		233		241		171		179		186
South Central Telephone Assn Inc		-		16		31		16		16		16		16
Southern Kansas Telephone Company Inc		124		117		117		117		109		117		109
Consolidated Communications of Kansas Company		23		23		23		23		23		23		-
Totah Communications Inc		54		54		54		54		54		54		54
Tri-County Telephone Assn. Inc		109		93		101		101		101		101		101
Twin Valley Telephone Inc		210		124		140		132		117		124		117
United Telephone Association Inc		109		109		117		101		101		101		78
Brightspeed of Southern Kansas, LLC fka United Te		715		676		645		637		614		614		(85)
Wamego Telecommunications Co Inc		78		78		54		70		47		85		62
Wheat State Telephone Inc DBA Wheat State Techn		85		93		85		85		85		93		93
Wilson Telephone Company Inc		62		39		39		47		54		54		54
Zenda Telephone Company Inc		8		8		8		8		8		8		8
United Communications Association Inc		-		-		-		-		-		-		909
Your Tel America dba Terra Com Wireless		1,966		2,976		3,380		1,360		1,375		1,360		1,360
Rainbow Communications, LLC		186		295		412		435		443		482		528
Cunningham Communications Inc		249		249		249		241		233		233		218
Nex-Tech Wireless LLC		925		948		723		738		746		746		761
IdeaTek Telecom, LLC		31		31		31		31		31		23		23
United Wireless Communications Inc		171		171		171		132		132		140		140
NE Colorado Cellular, Inc.dba Viaero Wireless		31		23		23		23		23		31		31
Midcontinent Communications		171		148		109		101		109		117		117
Total	\$	9,627	\$	10,458	\$	10,715	\$	8,252	\$	8,127	\$	8,151	\$	7,420
														\$ 9,643
														\$ 72,393

Line	Description	Reference		
1	Annual Administrative Costs - FY 28	[1] Administration Contract	\$	234,060
2	Additional Administrative Costs	Court Case Costs		-
3	Legal Costs	Court Case Costs		<u>4,554</u>
4	Total Administrative Costs		\$	238,614
5	Carrier Audit Expense	Administration Contract		<u>298,607</u>
6	Total Estimated Administrative Costs - FY 29		\$	298,607
<u>3rd Party Audit</u>				
7	Financial Audit	[1] BT&Co.	\$	20,800
8	Agreed-Upon-Procedure Review			<u>12,850</u>
9	Total KUSF Audit Costs		\$	33,650
10	Total Annual KUSF Administration and Audit Costs (Line 6 + 9 + 12)		\$	<u><u>570,871</u></u>

Notes:

- [1] All contracts with the Corporation Commission may be downloaded at:
https://supplier.sok.ks.gov/psp/sokfsprdsup/SUPPLIER/ERP/c/KS_SUPPLIER_MENU.KS_PROCR_CNTRCT.GBL.



1500 SW Arrowhead Road
Topeka, KS 66604-4027

Phone: 785-271-3100
Fax: 785-271-3354
<http://kcc.ks.gov/>

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

Laura Kelly, Governor

July 20, 2024

Ms. Wendy Harper, State USF Services Manager
Vantage Point Solutions
2211 North Minnesota Street
Mitchell, SD 57301
wendy.harper@vantagepnt.com

RE: KUSF Audit Invoices for work performed January 1 – June 30, 2024

Dear Wendy,

This letter authorizes Vantage Point Solutions (VPS) to withdraw \$142,787.38 from the Kansas Universal Service Fund (KUSF) for its January 2024 through June 2024, carrier audit services, consistent with Section 2.2.D.15 of the KUSF Administration contract between Kansas Corporation Commission and VPS (Contract).

Section 3 of the Contract allows a \$281,465.44 maximum reimbursement to VPS for carrier audit work performed between March 2023, and February 2024. VPS invoiced \$127,467.36 for work performed between March 2023 and June 2023, resulting in \$153,998.08 remaining for work to be performed from July 2023, through February 2024. VPS invoiced \$74,824.98 for work performed between July 2023 and December 2023, resulting in \$79,173.10 remaining for January and February 2024. VPS invoiced \$79,220.49 for work performed between January 2024 and February 2024, resulting in \$47.39 over contract max.

The maximum reimbursement to VPS for carrier audit work performed between March 2024 and February 2025 is \$289,909.00, of which VPS invoiced \$63,660.06 for March 2024 through June 2024. On July 10, 2024, review of the final invoice found the utilization of the wrong mileage rate for travel expenses recorded on the January 2024 to June 2024 KUSF Summary. On July 11, 2024, VPS submitted a revised KUSF Summary with adjustments recorded on the June 2024 invoice. Resulting in VPS invoicing \$63,614.28 for work performed between March 2024 and June 2024. Additionally a \$45.78 over contract max recognized on the June 2024 invoice for expenditures that occurred in January 2024 and February 2024, which was subject to the prior contract max. Thus, \$226,294.72 remains for work to be performed from July 2024 through February 2025.

Staff's review indicates the expenses VPS invoiced are reasonable and proper and authorizes VPS to withdraw \$142,787.38 from the KUSF.

Please contact me at (785) 271-3228 if you have any questions concerning this letter.

Sincerely,

Steve Garrett

Steve Garrett

Deputy Chief of Telecommunications

cc: Steve Garrett Deputy Chief of Telecommunications
Jeff McClanahan, Director of Utilities
Nicole Stephens, Vantage Point

Activity Month Data Month	Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24
Beginning Balance	\$ 4,220,437	\$ 4,069,152	\$ 4,107,372	\$ 4,165,902
Surplus/(Deficit) - page 2	(151,285)	38,219	58,531	(140,029)
Ending Balance	<u>4,069,152</u>	<u>4,107,372</u>	<u>4,165,902</u>	<u>4,025,873</u>
TAG Mobile Receivable	942,299	942,299	942,299	942,299
Ending Balance with Receivable	<u>\$ 5,011,451</u>	<u>\$ 5,049,671</u>	<u>\$ 5,108,201</u>	<u>\$ 4,968,172</u>
Activity Month Data Month	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24
Beginning Balance	\$ 4,025,873	\$ 4,400,967	\$ 4,384,503	\$ 4,321,408
Surplus/(Deficit) - page 2	375,093	(16,463)	(63,095)	(17,863)
Ending Balance	<u>\$ 4,400,967</u>	<u>\$ 4,384,503</u>	<u>\$ 4,321,408</u>	<u>\$ 4,303,545</u>
TAG Mobile Receivable	942,299	942,299	942,299	942,299
Ending Balance with Receivable	<u>\$ 5,343,266</u>	<u>\$ 5,326,802</u>	<u>\$ 5,263,707</u>	<u>\$ 5,245,844</u>
***Projected**				
Activity Month Data Month	Dec-24 Nov-24	Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25
Beginning Balance	\$ 4,303,545	\$ 4,139,489	\$ 3,959,683	\$ 3,777,348
Projected Surplus/(Deficit) - page 2	(164,057)	(179,806)	(182,335)	(326,927)
Ending Balance	<u>\$ 4,139,489</u>	<u>\$ 3,959,683</u>	<u>\$ 3,777,348</u>	<u>\$ 3,450,421</u>
TAG Mobile Receivable	942,299	942,299	942,299	942,299
Ending Balance with Receivable	<u>\$ 5,081,788</u>	<u>\$ 4,901,982</u>	<u>\$ 4,719,647</u>	<u>\$ 4,392,720</u>
<i>To Exhibit STG-1, ln. 8</i>				

Activity Month Data Month	As Reported										Average	***Projected***					Annual Total
	Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Mar - Oct. 24 Total	Dec-24 Nov-24		Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25			
Revenues/ Receipts:																	
LECs/Electing Carriers												\$ 5,229,398	\$ 5,229,398	\$ 5,229,398	\$ 5,229,398	\$ 67,878,142	
Wireless												10,360,760	10,328,799	10,328,799	10,328,799	125,759,617	
Interconnected VoIP												1,832,671	1,784,182	1,784,182	1,784,182	24,353,678	
IXC/Others												7,275,969	7,221,698	7,221,698	7,221,698	90,428,214	
Total	\$ 26,231,572	\$ 26,139,135	\$ 26,343,001	\$ 25,741,581	\$ 28,491,618	\$ 25,847,792	\$ 25,076,945	\$ 25,770,093	\$ 209,641,736	\$ 26,205,217	\$ 24,698,797	\$ 24,564,076	\$ 24,564,076	\$ 24,564,076	\$ 308,419,651		
Assessment Rate												11.69%	11.69%	11.69%	11.69%		
Fund Assessments	\$ 3,066,471	\$ 3,055,665	\$ 3,087,126	\$ 3,053,322	\$ 3,329,819	\$ 3,020,440	\$ 2,924,561	\$ 3,012,632	\$ 24,550,037	\$ 3,068,755	\$ 2,887,289	\$ 2,871,341	\$ 2,871,341	\$ 2,871,341	\$ 36,051,948		
Prior Year Adjustments	(76,011)	4,492	(4,635)	(1,304)	46,892	173	294	(2,314)	(32,413)	(4,052)	(4,052)	(4,052)	(4,052)	(4,052)	(48,620)		
Interest, Penalties, Misc. Rev.	30,991	25,250	22,701	23,881	44,816	32,774	39,813	20,517	240,743	30,093	30,093	30,093	30,093	30,093	361,115		
Revenue Retention/ (Write-Offs)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
KUSF Receipts	\$ 3,021,451	\$ 3,085,407	\$ 3,105,192	\$ 3,075,899	\$ 3,421,527	\$ 3,053,387	\$ 2,964,668	\$ 3,030,835	\$ 24,758,367	\$ 3,094,796	\$ 2,913,331	\$ 2,897,382	\$ 2,897,382	\$ 2,897,382	\$ 36,364,442		
Disbursements:																	
High Cost Support	\$ 3,004,046	\$ 3,004,045	\$ 3,004,045	\$ 3,004,048	\$ 3,004,048	3,004,048	3,004,048	3,004,048	24,032,376	\$ 3,004,047	3,004,048	3,004,048	3,004,048	3,004,048	\$ 36,048,568		
KUSF Support Changes - RLECs										\$ -	-	-	-	-	-		
Dual Party Relay Services	18,054	9,208	9,345	13,079	11,480	32,527	31,904	11,688	137,284	\$ 17,161	17,161	17,161	17,161	17,161	205,926		
TAP	121,828	4,296	3,481	28,584	3,135	5,073	51,820	4,145	222,361	\$ 27,795	27,795	27,795	27,795	27,795	333,541		
KLSP (Lifeline)	9,627	10,458	10,715	8,252	8,127	8,151	7,420	9,643	72,393	\$ 9,049	9,049	9,049	9,049	9,049	108,590		
Administrator Carrier Audit Fees	-	-	-	142,787	-	-	-	-	142,787	\$ 17,848	-	-	-	147,122	289,909		
3rd Party Audit Fees	-	-	-	-	-	-	32,350	-	32,350	\$ 4,044	-	-	-	-	32,350		
Administration (Net of Penalties)	18,937	18,937	18,937	18,937	18,937	18,937	18,937	18,937	151,496	\$ 18,937	18,937	18,937	18,937	18,937	227,244		
Other Administration Fees [1]	-	-	49	-	-	-	-	-	49	\$ 6	6	6	6	6	74		
Legal Fees [1]	-	-	-	-	472	878	-	-	1,350	\$ 169	169	169	2,698	169	4,554		
Bank Fees	244	244	90	240	235	236	255	237	1,782	\$ 223	223	223	223	223	2,672		
Certified Mail, Misc.	-	-	-	-	-	-	-	-	-	\$ -	-	-	-	-	-		
Monthly Disbursements	\$ 3,172,736	\$ 3,047,188	\$ 3,046,662	\$ 3,215,928	\$ 3,046,434	\$ 3,069,851	\$ 3,146,733	\$ 3,048,697	\$ 24,794,228	\$ 3,099,279	\$ 3,077,387	\$ 3,077,387	\$ 3,079,917	\$ 3,224,309	\$ 37,253,429		
Operating Surplus/(Deficit)	\$ (151,285)	\$ 38,219	\$ 58,531	\$ (140,029)	\$ 375,093	\$ (16,463)	\$ (182,065)	\$ (17,863)	\$ (35,862)	\$ (4,483)	\$ (164,057)	\$ (179,806)	\$ (182,335)	\$ (326,927)	\$ (888,986)		

Notes:
[1] Includes additional time related to the TAG Mobile bankruptcy case

Kansas Universal Service Fund
Statement of Fund Performance - April 2024
Prepared for the Kansas Corporation Commission

	<u>Activity for Apr-24</u>	<u>Year to Date Results for FY 2024 - 2025</u>
ASSESSMENT BASIS		
Intrastate Revenue	26,231,571.72	26,231,571.72
FUND REVENUES		
Fund Assessments	3,066,470.74	3,066,470.74
Out of Period Adjustments	(76,010.98)	(76,010.98)
Late Payment Charges	6,923.11	6,923.11
Late Worksheet Penalties	4,023.17	4,023.17
Outstanding Balance Penalty	126.39	126.39
Change Election Fees	-	-
Account Write Offs	-	-
Interest Income - Investment Account	19,918.47	19,918.47
Total Revenue	<u>\$ 3,021,450.90</u>	<u>\$ 3,021,450.90</u>
FUND DISBURSEMENTS		
Relay Services	18,053.95	18,053.95
TAP	121,827.73	121,827.73
Lifeline	9,627.03	9,627.03
High Cost Support	3,004,046.00	3,004,046.00
Audit Fees	-	-
External Audit Fees	-	-
Program Administration	18,937.00	18,937.00
Other Administration	-	-
Legal Fees	-	-
Bank Fees	244.32	244.32
Total Disbursements	<u>\$ 3,172,736.03</u>	<u>\$ 3,172,736.03</u>
MISCELLANEOUS INC (EXP)		
Administrator Penalty	-	-
Total Miscellaneous	<u>-</u>	<u>-</u>
Operating Surplus / (Deficit)	<u>\$ (151,285.13)</u>	<u>\$ (151,285.13)</u>

Fund Balances for April 2024	
Beginning Fund Balance	\$ 4,220,437.17
Operating Surplus (Deficit)	(151,285.13)
Ending Fund Balance	<u>4,069,152.04</u>
TAG Mobile Accrual of Receivable Per Docket No. 16-TAGC-323-SHO	942,298.98
Ending Fund Balance w/Receivable	<u>\$ 5,011,451.02</u>

May 13, 2024

Prepared by Vantage Point Solutions, Inc.
Reviewed by Wendy Harper

Kansas Universal Service Fund
Statement of Fund Performance - November 2024
Prepared for the Kansas Corporation Commission

	Activity for Nov-24	Year to Date Results for FY 2024 - 2025
ASSESSMENT BASIS		
Intrastate Revenue	\$ 25,770,092.78	\$ 209,641,736.23
FUND REVENUES		
Fund Assessments	3,012,631.70	24,550,036.61
Out of Period Adjustments	(2,313.72)	(32,413.49)
Late Payment Charges	648.14	22,956.81
Late Worksheet Penalties	1,282.22	52,454.66
Outstanding Balance Penalty	257.59	1,312.97
Change Election Fees	-	-
Account Write Offs	-	208.12
Interest Income - Investment Account	18,328.98	163,810.84
Total Revenue	\$ 3,030,834.91	\$ 24,758,366.52
FUND DISBURSEMENTS		
Relay Services	11,687.91	137,284.15
TAP	4,144.85	222,361.04
Lifeline	9,642.57	72,393.09
High Cost Support	3,004,048.00	24,032,376.00
Audit Fees	-	142,787.38
External Audit Fees	-	32,350.00
Program Administration	18,937.00	151,496.00
Other Administration	-	49.14
Legal Fees	-	1,350.15
Bank Fees	237.14	1,781.63
Total Disbursements	\$ 3,048,697.47	\$ 24,794,228.58
MISCELLANEOUS INC (EXP)		
Administrator Penalty	-	-
Total Miscellaneous	-	-
Operating Surplus / (Deficit)	\$ (17,862.56)	\$ (35,862.06)

Fund Balances for November 2024

Beginning Fund Balance	4,202,437.67
Operating Surplus (Deficit)	(17,862.56)
Ending Fund Balance	4,184,575.11
TAG Mobile Accrual of Receivable Per Docket No. 16-TAGC-323-SHO	942,298.98
Ending Fund Balance w/Receivable	\$ 5,126,874.09

December 4, 2024

Prepared by Vantage Point Solutions, Inc.
Reviewed by Wendy Harper

Local Exchange/Electing Carrier
Revenues
As Reported and Projected

Company	Activity Month Data Month	As Reported									As Projected				Total	
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Average	Dec-24 Nov-24	Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25		
KS001020	Blue Valley Tele-Communications Inc	*													*	
KS001031	Consolidated Communications of Missouri Company	*													*	
KS001050	Columbus Communication Services LLC	*													*	
KS001060	Tri-County Telephone-Council Grove Study Area	*													*	
KS001070	Craw-Kan Telephone Co-op Inc	*													*	
KS001080	Cunningham Telephone Company Inc	*													*	
KS001090	Elkhart Telephone Company	*													*	
KS001100	Golden Belt Telephone Association Inc	*													*	
KS001110	Gorham Telephone Company	*													*	
KS001120	H & B Communications Inc	*													*	
KS001140	Haviland Telephone Company	*													*	
KS001150	Home Telephone Co Inc	*													*	
KS001160	JBN Telephone Company Inc	*													*	
KS001170	KanOkla Telephone Association	*													*	
KS001190	LaHarpe Telephone Co., Inc.	*													*	
KS001200	Madison Telephone LLC	*													*	
KS001230	Mokan Dial Inc	*													*	
KS001240	Moundridge Telephone Company	*													*	
KS001260	Mutual Telephone Company	*													*	
KS001270	Peoples Telecommunications, LLC	*													*	
KS001280	Pioneer Telephone Association Inc	*													*	
KS001290	Rainbow Telecommunications Association Inc	*													*	
KS001300	Rural Telephone Service Co Inc dba Nex-Tech	*													*	
KS001310	S & A Telephone Company Inc	*													*	
KS001320	S & T Telephone Coop Assn	*													*	
KS001330	South Central Telephone Assn Inc	*													*	
KS001350	Southern Kansas Telephone Company Inc	*													*	
KS001370	Consolidated Communications of Kansas Company	*													*	
KS001380	Totah Communications Inc	*													*	
KS001390	Tri-County Telephone Assn. Inc	*													*	
KS001400	Twin Valley Telephone Inc	*													*	
KS001410	United Telephone Association Inc	*													*	
KS001440	Wamego Telecommunications Co Inc	*													*	
KS001450	Wheat State Telephone Inc DBA Wheat State Technologies	*													*	
KS001480	Wilson Telephone Company Inc	*													*	
KS001490	Zenda Telephone Company Inc	*													*	
			1,282,119	1,283,659	1,276,713	1,278,095	1,249,085	1,239,951	1,225,218	1,217,085	1,256,490	1,211,198	1,211,198	1,211,198	1,211,198	14,896,716
KS001411	Brightspeed of Southern Kansas, Inc. fka United Telephone of Kansas	*														*
KS001361	Southwestern Bell Telephone Company	*														*
	GRAND TOTAL		6,178,117	6,234,657	6,117,802	5,974,485	6,155,091	5,770,987	5,248,174	5,281,236	5,870,069	5,229,398	5,229,398	5,229,398	5,229,398	67,878,142

Company	Activity Month Data Month	As Reported					As Projected					TOTAL			
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Average	Dec-24 Nov-24		Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25
Topeka Cellular Telephone Company, Inc	*													*	
Kansas #15 Limited Partnership	*													*	
Tempo Telecom, LLC	*													*	
Your Tel America dba Terra Com Wireless	*													*	
Celco Partnership	*													*	
Alltel Corporation fka AllTel Communications d/b/a Verizon Wireless	*													*	
New Cingular Wireless PCS, LLC	*													*	
Spok, Inc	*													*	
Onstar LLC	*													*	
Assurance Wireless USA L.P.	*													*	
MOBILPAGE INC	*													*	
Global Connection Inc of America	*													*	
Ztar Mobile, Inc.	*													*	
USCOC of Nebraska/Kansas LLC	*													*	
Nex-Tech Wireless LLC	*													*	
T-Mobile Central LLC	*													*	
United Wireless Communications Inc	*													*	
American Messaging Services, LLC	*													*	
i-Wireless LLC	*													*	
Globalstar USA LLC	*													*	
Consumer Cellular Inc	*													*	
NE Colorado Cellular, Inc.dba Viaero Wireless	*													*	
Boomerang Wireless, LLC	*													*	
Ready Wireless, LLC	*													*	
TracFone Wireless, Inc.	*													*	
Easy Telephone Services Company	*													*	
Q Link Wireless, LLC	*													*	
PureTalk Holdings, Inc.	*													*	
UVNV, Inc.	*													*	
Cricket Wireless LLC	*													*	
MetroPCS Michigan LLC	*													*	
SelecTel, Inc.	*													*	
IM Telecom, LLC	*													*	
Patriot Mobile, LLC	*													*	
US Mobile, Inc.	*													*	
Excellus Communications, LLC	*													*	
Tello, LLC	*													*	
Comcast OTRI, LLC	*													*	
Lycamobile USA, Inc.	*													*	
Wing Tel Inc.	*													*	
Garmin Services Inc	*													*	
Visible Service LLC	*													*	
Liberty Mobile Wireless LLC	*													*	
Hello Mobile Telecom, LLC	*													*	
The Light Phone Inc.	*													*	
Spectrum Mobile LLC	*													*	
Locus Telecommunications, LLC	*													*	
STX Group LLC dba Twigby	*													*	
Mint Mobile, LLC	*													*	
Best Buy Health, Inc. dba Lively	*													*	
Dish Wireless LLC	*													*	
Gabb Wireless, Inc.	*													*	
CSC Wireless, LLC	*													*	
Zefcom, LLC dba Affinity Cellular dba Club Cellular	*													*	
J Rhodes Enterprises, LLC dba Titanium Wireless	*													*	
Troomi Wireless, Inc.	*													*	
Excess Telecom, Inc.	*													*	
Cox Wireless, LLC	*													*	
Marcom Wireless Holdings, LLC	*													*	
Tube Incorporated DBA Reach Mobile	*													*	
Hoop Wireless, LLC	*													*	
Whoop Connect Inc.	*													*	
Red Pocket, Inc.	*													*	
Norcell, LLC	*													*	
Bark Technologies, Inc.	*													*	
Unity Wireless Inc	*													*	
NuWave Communications, Inc.	*													*	
Nova Labs, Inc. dba Helium Mobile	*													*	
Volt Mobile Inc.	*													*	
Torch Wireless	*													*	
NatWireless, LLC	*													*	
Rocstar Wireless LLC	*													*	
IDT Domestic Telecom, Inc.	*													*	
TruConnect Communications Inc.	*													*	
Prosper Wireless LLC	*													*	
Mobile 13, Inc.	*													*	
RSCU Mobile, LLC	*													*	
Affiniti Ventures, Inc. dba Noble Mobile	*													*	
Viva-US Telecommunications, Inc.	*													*	
Google North America, Inc. dba Google Fi	*													*	
Plintron Technologies USA LLC	*													*	
Earthlink, LLC	*													*	
		10,310,710	10,337,089	10,790,909	10,251,342	10,719,689	10,662,527	10,514,469	10,825,725	10,515,490	10,360,760	10,328,799	10,328,799	10,328,799	125,759,617

Company	Activity Month Data Month	As Reported									Average	As Projected				TOTAL
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Dec-24 Nov-24		Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25		
Mitel Cloud Services Inc.	*															*
Netwolves Network Services, LLC	*															*
Cable One Inc	*															*
IP Networked Services Inc	*															*
Vonage America LLC	*															*
nexVortex, Inc	*															*
Momentum Telecom Inc	*															*
8 X 8 Inc	*															*
iTalk Global Communications, Inc.	*															*
Phone.com, Inc.	*															*
Ring Central Inc	*															*
Skype Communications US Corporation	*															*
Telias Inc	*															*
Via Talk LLC	*															*
Vonage Business Inc	*															*
BCI Telephone of Kansas, LLC	*															*
CCI Network Services, LLC	*															*
Kosmaz Technologies LLC	*															*
Interface Security Systems LLC	*															*
OOMA, Inc.	*															*
VoIP Innovations LLC	*															*
Atwood Cable Systems, Inc.	*															*
Grasshopper Group, LLC	*															*
Go Solo Technologies of Florida One, Inc.	*															*
Skybeam, LLC	*															*
LBSat LLC	*															*
Unitel Voice, LLC	*															*
Dynalink Communications, Inc.	*															*
AMG Technology Investment Group, LLC	*															*
Meriplex Telecom, LLC	*															*
FracTEL LLC	*															*
Nextiva Inc.	*															*
Star2Star Communications, LLC	*															*
Spectrum Advanced Services LLC	*															*
Fuze Inc	*															*
Network Innovations, LLC	*															*
GoTo Communications Inc	*															*
CallTower, Inc.	*															*
Fonality Inc.	*															*
Zito West Holding LLC	*															*
ViaSat, Inc.	*															*
Cytracom, LLC	*															*
SIP.US LLC	*															*
TampaBay DSL Inc. d/b/a PBX-Change	*															*
XMission, LLC	*															*
Greenfly Networks, Inc.	*															*
Hughes Network Systems, LLC	*															*
NetFortris Acquisition Co., Inc.	*															*
ISG Technology LLC	*															*
S-NET Communications, Inc.	*															*
Magna5, LLC	*															*
Zultys, Inc.	*															*
AltaWorx, LLC	*															*
COMM-CORE, LLC	*															*
TDS Metrocom, LLC	*															*
Dialpad, Inc.	*															*
Bandwidth, Inc.	*															*
Chicago Business VoIP, LLC	*															*

Company	Activity Month Data Month	As Reported									Average	As Projected				TOTAL
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Dec-24 Nov-24		Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25		
IPitomy Communications, LLC	*															*
Telzio, Inc.	*															*
VanillaSoft Corp.	*															*
TelAgility Corp.	*															*
Kansas Communication Services Inc.	*															*
Cloudecall, Inc.	*															*
iCommerce Services, Inc.	*															*
Distributed Computing, Inc.	*															*
Google Fiber North America, Inc.	*															*
No More PBX LLC	*															*
SimpleVoIP, LLC	*															*
Affiliated Technology Solutions, Inc.	*															*
2 Talk, LLC	*															*
Voyant Communications, LLC	*															*
Sangoma US Inc.	*															*
DSCI, LLC	*															*
MagicJack SMB, Inc.	*															*
upNetworx, Inc.	*															*
VirtuPhone LLC	*															*
Engage Holdings, LLC d/b/a iQventures	*															*
Broadsmart Global, Inc.	*															*
EM3 Networks, LLC	*															*
JMZ Corporation	*															*
WTC Technologies, Inc.	*															*
W W T, Inc.	*															*
ITC Global Networks, LLC	*															*
Vision, Voice and Data Systems, LLC	*															*
AcuityVOIP, LLC	*															*
PanTerra Networks, Inc.	*															*
Sequire LLC	*															*
Estech Systems, Inc.	*															*
ICIM Corporation	*															*
Mercury Wireless Kansas, LLC	*															*
FluentStream Technologies, LLC	*															*
Tri-County Communications	*															*
Nuso, LLC	*															*
Netelligent Corporation	*															*
NEC Cloud Communications America, Inc.	*															*
Pulsar360 Corp.	*															*
Global VoIP LLC	*															*
Google Voice Inc.	*															*
Wiensco LLC dba Commonworld of Kansas City	*															*
Network Computing Solutions LLC	*															*
Konica Minolta Business Solutions	*															*
Forerunner Technologies, Inc.	*															*
Kansas Information Technologies, LLC	*															*
Telecom Evolutions, LLC	*															*
EAGLE BROADBAND, LLC	*															*
Aureon Communications, LLC	*															*
Coeo Solutions, LLC	*															*
Junction Networks Inc.	*															*
Zoom Voice Communications Inc.	*															*
Versatel, LLC	*															*
White Label Communications, LLC	*															*
BT Americas Inc.	*															*
TailWind Voice and Data, Inc.	*															*
Allegiant Networks LLC	*															*
4Voice LLC	*															*

Company	Activity Month Data Month	As Reported									Average	As Projected				TOTAL
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Dec-24 Nov-24		Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25		
Lightspeed CLEC Inc	*															*
Medtel Communications LLC	*															*
ServiceTitan, Inc.	*															*
Epic Touch Co.	*															*
TrueVoip Corp.	*															*
Broadband Voice, LLC	*															*
Marco Technologies, LLC	*															*
Cloudli Communications Inc. f/k/a BBTel Inc.	*															*
Snapcom LLC	*															*
VoIPly, LLC	*															*
Unified Global Solutions, LLC	*															*
Telmate, LLC	*															*
LimeBox Networks, LLC	*															*
My Wifi Guy, LLC dba Zenith Technology Solutions	*															*
Ring Street, LLC	*															*
BroadSoft Adaption, Inc.	*															*
Loop Communications	*															*
Teligent IP fka Ipitimi Inc	*															*
Mango Voice LLC	*															*
Clear Rate Communications, Inc.	*															*
GENESYS CLOUD SERVICES, INC.	*															*
Syndeo LLC	*															*
BUTLER RURAL ELECTRIC COOP ASSN INC	*															*
ThinQ Technologies, Inc.	*															*
Regional Media Corporation, Inc.	*															*
PayG, LLC	*															*
Unified Telecom Inc. DBA CCSI Communications	*															*
PGB Fiber, LLC d/b/a Pioneer Communications	*															*
Thing5 LLC	*															*
G12 Communications LLC	*															*
SIP2020, LLC	*															*
Fulton Communications, Inc. d/b/a Vertical Communications	*															*
DPAccess, LLC	*															*
United Office Inc.	*															*
Maxsip Telecom Corporation	*															*
Wired Telecom, LLC	*															*
USIPCommunications, LLC	*															*
Noble Systems Communications LLC	*															*
CallCurrent, Inc.	*															*
Tadiran Telecom, Inc.	*															*
MarketSpark, Inc.	*															*
Net2Phone 2.0 America, Inc.	*															*
Aline Phone Systems, Inc.	*															*
Delta Communications, LLC dba Clearwave	*															*
Altigen Communications, Inc.	*															*
Hughes Telephone, Inc.	*															*
Speakerbus Incorporated	*															*
Office Management Systems, Inc.	*															*
CommandLink, LLC	*															*
MitoTec LLC	*															*
Arena One, LLC	*															*
DentalTek, LLC	*															*
CPT Network Solutions	*															*
Verge Network Solutions, LLC	*															*
TelWare Corporation	*															*
Skye Telecom LLC	*															*
UComTel Inc.	*															*
SCS COMMUNICATIONS, LLC	*															*

Company	Activity Month Data Month	As Reported									As Projected				TOTAL
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Average	Dec-24 Nov-24	Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25	
Minnesota Telephone Inc.	*														*
Clearly IP Inc.	*														*
KeyConnect, LLC	*														*
Wiretap Telecom, LLC	*														*
Clear Live, LLC	*														*
Viirtue, Inc.	*														*
Verve Cloud, Inc.	*														*
Back 2 Roots LLC	*														*
Communications Technologies, Inc.	*														*
TCB Technologies LLC	*														*
Telco Bill Center, Inc.	*														*
Jivetel, LLC	*														*
Votacall, Inc.	*														*
Quality Voice & Data, Inc.	*														*
Smart Communications Holding, Inc.	*														*
Pathwayz Communications, Inc.	*														*
Sun Communications Inc.	*														*
Mosaic Networx LLC	*														*
Teledynamics Communications Service Corp.	*														*
Mix Networks, Inc.	*														*
Losh Communications, Inc.	*														*
Masergy Cloud Communications, Inc.	*														*
The Chamberlain Group, LLC	*														*
Framework IT, LLC	*														*
IPath Managed Services, LLC	*														*
Contivio.com Corporation	*														*
Cincinnati Bell Extended Territories LLC dba altafiber connected services	*														*
Gigs Wireless, LLC	*														*
CTN Group, Inc.	*														*
VR3 Cloud International LLC	*														*
Wireless Services Center, Inc.	*														*
ACS Technologies Group, Inc.	*														*
InterDev, LLC	*														*
Re-Invent Telecom, LLC	*														*
Total		2,288,080	1,971,621	2,091,374	2,188,195	2,341,327	2,063,471	2,055,185	2,169,211	2,146,058	1,832,671	1,784,182	1,784,182	1,784,182	24,353,678

Company	Activity Month Data Month	As Reported								As Projected					TOTAL
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24	Average	Dec-24 Nov-24	Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25	
Blue Valley Technologies Inc.	*														*
Blue Valley Tele-Communications Inc	*														*
Columbus Communication Services, LLC	*														*
FIBER COMMUNICATIONS OF COLUMBUS, LLC	*														*
TC Wireless, Inc.	*														*
Tri-County Telephone-Council Grove Study Area	*														*
Golden Belt Long Distance - COMBINED w/LEC	*														*
Haviland Telephone Company, Inc	*														*
LaHarpe Telephone Co Inc	*														*
MT Networks, LLC	*														*
Mokan Communications Inc	*														*
Mutual Telephone Co	*														*
S & A Communications	*														*
S&T COMMUNICATIONS, LLC	*														*
South Central Wireless Inc	*														*
Southern Kansas Telephone Co., Inc - MetroLink	*														*
Tri-County Telephone Assn Inc	*														*
Wheat State Telephone DBA Wheat State Technologies	*														*
Wilson Communication Co Inc	*														*
Global Crossing Telecommunications Inc.	*														*
Securus Technologies, LLC	*														*
Amerivision Communications Inc	*														*
DeltaCom, LLC	*														*
Easton Telecom Services LLC	*														*
High Plains Telecommunications, Inc.	*														*
IDT America Corp	*														*
KanOkla Communications, LLC	*														*
Lingo Telecom, LLC f/k/a Matrix Telecom, LLC	*														*
MCI Communication Services LLC	*														*
MCIMetro Access Transmission Services LLC	*														*
Nos Communications, Inc	*														*
PNG Telecommunications Inc	*														*
CenturyLink Communications, LLC FKA QWEST Communications Cor	*														*
Transworld Network Corp	*														*
United Communications Association Inc	*														*
US South Communications Inc	*														*
Working Assets Funding Service Inc dba Credo Long Distance	*														*
RingSquared, LLC fka International Telcom, LLC	*														*
McLeod USA Telecommunications Services LLC	*														*
inContact, Inc	*														*
Nex-Tech LLC	*														*
Reliant Communications, Inc	*														*
Global Crossing Local Services, Inc.	*														*
QuantumShift Communications Inc d/b/a Vcom Solutions	*														*
Teleport Communications America, LLC	*														*
CBTS Technology Solutions, LLC	*														*
Wiltel Communications LLC	*														*
Windstream NuVox Kansas, LLC	*														*
Craw-Kan Telephone Cooperative Inc.	*														*
Level 3 Communications, LLC	*														*
Telcove Operations, LLC	*														*
Fusion Connect, LLC	*														*
Giant Communications Inc	*														*
XO Communication Services, LLC	*														*
Network Communications Intl Corp dba NCIC Inmate Communications	*														*
Verizon Long Distance LLC	*														*
Windstream New Edge, LLC	*														*
Enhanced Communications Group LLC	*														*
AT&T Enterprises f/k/a AT&T Corp.	*														*
PaeTec Communications, LLC	*														*
Access One Inc	*														*

Company	Activity Month Data Month	As Reported								Average	As Projected				TOTAL
		Apr-24 Mar-24	May-24 Apr-24	Jun-24 May-24	Jul-24 Jun-24	Aug-24 Jul-24	Sep-24 Aug-24	Oct-24 Sep-24	Nov-24 Oct-24		Dec-24 Nov-24	Jan-25 Dec-24	Feb-25 Jan-25	Mar-25 Feb-25	
USA Digital Communications, Inc.	*														*
WTC Communications Inc	*														*
Peoples Telecommunications LLC dba Peoples Long Distance	*														*
NetworkIP, LLC	*														*
Cox Kansas Telecom LLC	*														*
ACN Communication Services LLC	*														*
ANPI Business, LLC	*														*
Total Customer Services Inc	*														*
SBC Long Distance LLC	*														*
Metropolitan Telecommunications of Kansas, LLC (MetTel)	*														*
Custom Teleconnect Inc	*														*
Sage Telecom Communications, LLC	*														*
Hypercube Networks, LLC f/k/a Intrado Communications, LLC	*														*
BCN Telecom Inc	*														*
Wholesale Carrier Services Inc	*														*
Level 3 Telecom of Kansas City LLC	*														*
Global Tel*Link Corporation	*														*
Legent Comm LLC d/b/a Long Distance America d/b/a Long Distance S	*														*
Unite Private Networks, LLC dba Segra	*														*
BW Telecom Long Distance, Inc.	*														*
Consolidated Communications Enterprise Services, Inc.	*														*
Empire District Industries, Inc-	*														*
Broadwing Communications LLC	*														*
Telrite Corporation	*														*
Broadband Dynamics LLC	*														*
Convergia Inc	*														*
Granite Telecommunications, LLC	*														*
H & B Cable Services Inc	*														*
Advantage Telecommunications Corp	*														*
TouchTone Communications, Inc.	*														*
K-Powernet LLC	*														*
France Telecom Corporate Solutions LLC	*														*
BCM One, Inc.	*														*
Inmate Calling Solutions, LLC d/b/a ICSolutions	*														*
TelAtlantic Communications, Inc.	*														*
Airespring Inc	*														*
Gorham Telephone Company(LD)	*														*
SKT Inc	*														*
Accessline Communications Corporation	*														*
Rainbow Communications, LLC	*														*
Voicecom Telecommunications, LLC	*														*
GBT Communications Inc	*														*
800 Response Information Services LLC	*														*
Cunningham Communications Inc	*														*
H & B Communications Inc (2)	*														*
IdeaTek Telecom, LLC	*														*
Windstream Communications, LLC	*														*
Comcast Phone of Kansas LLC	*														*
First Communications LLC	*														*
Avid Communications LLC	*														*
Cause Based Commerce, Inc	*														*
LR Communications, Inc.	*														*
New Horizons Communications Corp	*														*
Twin Valley Communications, Inc.	*														*
Conterra Ultra Broadband LLC	*														*
Public Communication Services Inc	*														*
Home Communications Inc	*														*
MCC Telephony of the Midwest LLC	*														*
Broadview Networks, Inc.	*														*
Neutral Tandem-Kansas LLC	*														*
Cebridge Telecom KS, LLC	*														*

Company	Activity Month Data Month	As Reported									As Projected				TOTAL
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Stratus Networks Inc	*														*
Entelegent Solutions, Inc.	*														*
Kansas Fiber Network, LLC	*														*
Zayo Group, LLC	*														*
Peerless Network of Kansas, LLC	*														*
Crexendo Business Solutions, Inc.	*														*
WiMacTel, Inc.	*														*
Spectrotel of the Midwest LLC	*														*
GC Pivotal, LLC	*														*
Time Warner Cable Business LLC	*														*
Socket Telecom LLC	*														*
Correct Solutions, LLC	*														*
Missouri Network Alliance, LLC	*														*
Scissortail Communications, LLC	*														*
Combined Public Communications, LLC	*														*
WANRack, LLC	*														*
Midcontinent Communications	*														*
Triton Networks, LLC	*														*
Fusion Cloud Services, LLC	*														*
Brightspeed Broadband, LLC f/k/a CenturyTel Broadband Services, LLC	*														*
Weave Communications, Inc.	*														*
Cable One VoIP LLC	*														*
Everfast Fiber Networks LLC	*														*
Onvoy, LLC	*														*
Velocity, A Managed Service Company Inc.	*														*
CITY TELE COIN COMPANY, INC.	*														*
GoDaddy.com, LLC	*														*
		8,097,886	7,987,882	7,859,963	7,738,465	7,515,014	7,468,656	7,480,460	7,338,825	7,685,894	7,275,969	7,221,698	7,221,698	7,221,698	90,428,214

KUSF Annual
Revenue Growth/Decline Analysis
(Reported Revenues)

	Projected Yr. 28	Year 27	Annual Change		2 Year
	2024/2025	2023/2024	Revenue	Percent	Average
RLECs	\$ 14,896,716	\$ 16,948,938	\$ (2,052,222)	-12.11%	-10.18%
Brightspeed	*				*
SWBT	*				*
Wireless	125,759,617	126,618,003	(858,386)	-0.68%	-1.67%
VoIP	24,353,678	24,638,560	(284,882)	-1.16%	1.98%
IXCs/Others	90,428,214	97,970,107	(7,541,894)	-7.70%	-9.22%
Total	\$ 255,438,225	\$ 331,431,362	\$ (23,011,711)	-6.49%	-6.50%

	Year 27	Year 26	Annual Change		2 Year
	2023/2024	2022/2023	Revenue	Percent	Average
RLECs	\$ 16,948,938	\$ 18,474,103	\$ (1,525,165)	-8.26%	-7.45%
Brightspeed	*				*
SWBT	*				*
Wireless	126,618,003	130,082,690	(3,464,687)	-2.66%	-3.85%
VoIP	24,638,560	23,438,031	1,200,529	5.12%	6.45%
IXCs/Others	97,970,107	109,755,685	(11,785,578)	-10.74%	-10.30%
Total	\$ 331,431,362	\$ 354,501,840	\$ (23,070,478)	-6.51%	-7.15%

	Year 26	Year 25	Annual Change		
	2022/2023	2021/2022	Revenue	Percent	
RLECs	\$ 18,474,103	\$ 19,787,746	\$ (1,313,643)	-6.64%	
Brightspeed	*				*
SWBT	*				*
Wireless	130,082,690	136,981,674	(6,898,984)	-5.04%	
VoIP	23,438,031	21,746,603	1,691,428	7.78%	
IXCs/Others	109,755,685	121,762,566	(12,006,881)	-9.86%	
Total	\$ 354,501,840	\$ 384,466,382	\$ (29,964,542)	-7.79%	

	Projected Yr	Recognized	Projected	N/A	Projected Yr.
	28 Revenues	Proj. Growth/ Decline %	Revenue Change	Plus: Rebalancing	29 Revenue
RLECs	\$ 14,896,716	-10.00%	\$ (1,489,672)	\$ 139,455	\$ 13,546,499
CenturyLink	*				*
SWBT	*				*
Wireless	125,759,617	-1.50%	(1,886,394)	-	123,873,223
VoIP	24,353,678	2.00%	487,074	-	24,840,752
IXCs/Others	90,428,214	-9.00%	(8,138,539)	-	82,289,674
Totals	\$ 308,419,651	-6.02%	\$ (18,579,011)	\$ 139,455	\$ 289,980,095

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Comparison: Projected Year 27 Revenues (March 2023 - Feb. 2024) To Reported Revenues

Category	Projected FY 27 Revenue (1)	Reported Year 27 Assessable Revenues	Difference
	(A)	(B)	(C = B - A)
ILECs	\$ 81,284,242	\$ 82,204,692	\$ 920,450
Wireless	126,400,580	126,618,003	217,423
Interconnected VoIP	24,253,236	24,638,560	385,324
IXCs/Others	97,192,516	97,970,107	777,591
Total	\$ 329,130,574	\$ 331,431,362	\$ 2,300,788
Average Monthly Revenues	\$ 27,427,548	\$ 27,619,280	\$ 191,732

Comparison: Original Projected Year 28 Revenue To Current Projected FY 28 Revenue

Category	Projected FY 28 Revenues for Current Assessment Rate	Current FY 28 Projected Revenues	Difference
	(2) (A)	(B)	C = (B - A)
ILECs	\$ 72,137,575	\$ 67,878,142	\$ (4,259,433)
Wireless	121,344,557	125,759,617	4,415,060
VoIP	25,587,164	24,353,678	(1,233,485)
IXCs/Others	86,987,302	90,428,214	3,440,912
Total (2)	\$ 306,056,598	\$ 308,419,651	\$ 2,363,053
Average Monthly Revenues	\$ 25,504,716	\$ 25,701,638	\$ 196,921
Net KUSF Obligation	\$ 35,788,726	\$ 35,788,726	\$ -
Calculated Assessment Rate	11.69%	11.60%	-0.09%

Comparison: Impact of Revenue Adjustment Factor/Projections on FY 28 Revenues and Assessment Rate

Category	Current FY 28 Projected Revenues	Projected FY 29 Revenues	Difference
	(A)	(B)	(C = B - A)
LECs/Electing Carriers	\$ 67,878,142	\$ 58,976,446	\$ (8,901,696)
Wireless	125,759,617	123,873,223	(1,886,394)
Interconnected VoIP	24,353,678	24,840,752	487,074
IXCs/Others	90,428,214	82,289,674	(8,138,539)
Total	\$ 308,419,651	\$ 289,980,095	\$ (18,439,556)
Average Monthly Revenues	\$ 25,701,638	\$ 24,165,008	\$ (1,536,630)
Estimated KUSF Obligation	\$ 35,221,912	\$ 35,221,912	\$ -
Calculated Assessment Rate	11.42%	12.15%	0.73%

Notes:

(1) March 2021 - Feb. 2022, KUSF FY 27, projected revenue, Direct Testimony of Sandy K. Reams, Exhibit SKR-1, p. 2; Attachment L, Docket No. 21-GIMT-095-GIT.

(2) KUSF Year 28 projected revenue (March 2022 - Feb. 2023), January 5, 2024 Direct Testimony of Steve Garrett, Exhibit STG-1, p. 2; Attachment L, Docket No. 24-GIMT-229-GIT.

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

VERIFICATION

Steve Garrett, being duly sworn upon his oath deposes and states that he is Deputy Chief of Telecommunications for the Utilities Telecommunications Division of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Testimony*, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.




Steve Garrett
Deputy Chief of Telecommunications
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 4th day of December, 2024.


Notary Public

My Appointment Expires: 4/28/25

 NOTARY PUBLIC - State of Kansas
ANN M. MURPHY
My Appt. Expires 4/28/25

CERTIFICATE OF SERVICE

25-GIMT-141-GIT

I, the undersigned, certify that a true and correct copy of the above and foregoing Direct Testimony of Steve Garrett (Public Version) was served via electronic service this 13th day of December, 2024, to the following:

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25-GIMT-141-GIT

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