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June 26, 2024

Ms. Lynn M. Retz, Executive Director
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604-4027

RE: Docket No. 24-GIMT-612-GIT

Dear Ms. Retz:

Enclosed is the Elkhart Telephone Co., Inc. Section 254(e) Certification required by the Commission to be filed in this docket.

Some information in this filing has been marked confidential. We believe the information is of such competitive sensitivity that its disclosure to any person other than the company, the Commission and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Becky Scott'. The signature is written in a cursive, flowing style.

Becky Scott

Enclosures

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THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 24-GIMT-612-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

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

1. My title is President ___ of Elkhart Telephone Company, Inc. ___ (Company/Cooperative).

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

2. ___ Elkhart Telephone Company, Inc. ___ (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. _98-GIMT-241-GIT_ by order dated _December 5, 1997_ and KUSF support purposes in Docket No. _98-GIMT-241-GIT_ by order dated _December 5, 1997_.

3. By this affidavit, I certify that all federal high-cost USF, including (HCL), FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or (KUSF) received by ___ Elkhart Telephone Company, Inc. ___

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

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

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

(Pursuant to Kan. Stat. Ann. 53-601.)



Signature

Becky Scott
Printed/Typed Name

Executed on 06/26/2024 date.

Email address: bscott@epictouch.com

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: *Elkhart Telephone Company, Inc.*

DATA YEAR: 2023

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: *Elkhart Telephone Company, Inc.*

DATA YEAR: 2023

**For the Following Lines, Use Gross Additions for Plant and Annual Amounts for
Expenses for the Test Year**

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: *Elkhart Telephone Company, Inc.*

DATA YEAR: **2023**

Test for use of FUSF & KUSF

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: *Elkhart Telephone Company, Inc.*

DATA YEAR: **2023**

Narrative Report for New Investments

ETC Certification for Use of **USF** Support
Provided to the Kansas Corporation Commission

Company Name: Elkhart Telephone Company, Inc.

Data Year: 2023

Town or Exchange A	Description of Improvement B	Cash Investment C	Allocation % D	Notes E	Amount Used in the USF Supported Areas F = C x D

NOTES:

↑

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255). For CETCs, this amount should match the New

Contact: Becky Scott
Title: President

Phone No.: 620-697-2111
E-Mail: bscott@epictouch.com

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

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?
(Yes/No)

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

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

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

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

1. My title is President of the Elkhart Telephone Company, Inc.
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding Elkhart Telephone Company, Inc. (Company/Cooperative) to the statements made in this certification.

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

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 06/26/2024 (date).



Signature

Becky Scott

Printed/Typed Name

QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

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

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

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

Signature

Print / Typed Name

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

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

1. My title is President of the Elkhart Telephone Company, Inc.
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding Elkhart Telephone Company Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Elkhart Telephone Company, Inc. (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 06/26/2024 (date).



Signature

Becky Scott

Printed / Typed Name

**24-GIMT-612-GIT
Attachment 5**

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

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
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7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

1. My title is _____ of the _____
(Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the
Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding
_____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (Company/
Cooperative) offers a local usage plan comparable to that of the incumbent.

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

Signature

Printed/Typed Name