

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

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

In the Matter of the Application of Nex-Tech)
Wireless, LLC for Expansion of its) Docket No. 24-NTWZ-672-ETC
Designation as a Lifeline-Only Eligible)
Telecommunications Carrier.)

**ORDER GRANTING AMENDED APPLICATION TO EXPAND
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (“Commission”) for consideration and determination. Having examined its files and records, the Commission finds and concludes:

1. On April 12, 2024, Nex-Tech Wireless, LLC, (“NTW”) filed an application requesting to expand its designation as an Eligible Telecommunications Carrier (“ETC”) within certain exchanges for purposes of federal Lifeline support. On April 16, 2024, NTW filed an amended application (“Application”) to correct an exhibit reference at paragraph 28 and to include exchanges in the proposed expansion area as provided in Exhibit B.¹ On February 7, 2025, NTW revised Exhibit B to exclude previously approved exchanges. On February 14, 2025, a second revised Exhibit B to the Application was filed to add exchanges previously omitted, and a third revised Exhibit B was filed on March 10, 2025, to correct telephone company names and corresponding exchanges, and to correct spelling the exchange names.²

2. NTW’s current ETC designation in Kansas is as follows:

¹Staff’s Report and Recommendation, Mar. 20, 2025 (R&R), p. 1.

²*Id.*

In 2005 the Commission designated Nex-Tech as an ETC for purposes of receiving federal high-cost and Lifeline support in certain exchanges within the Southwestern Bell Telephone Company, LLC (“SWBT”) study area and throughout the entire study areas of Golden Belt Telephone, Mutual Telephone, Rural Telephone, and S&T Telephone Cooperative Association. In 2007, the Commission granted NTW an expansion of its ETC service area to include the Sharon Springs, Leoti, and Tribune wire centers of the Sunflower Telephone Co., Inc. (“Sunflower Telephone”) study area. The following year, NTW was granted an expansion of its ETC service area to include the Gorham Telephone Company, Inc., H&B Communications, Inc. and Wilson Telephone Company, Inc. study areas and in addition wire centers of Sunflower Telephone and SWBT, as well as in several wire centers of United Telephone Company of Kansas d/b/a Embarq (“Embarq”). Later in 2008, NTW’s ETC service area was again expanded to include the Geneseo wire center served by Home Telephone Company. In 2011, NTW was designated in the entire Cunningham study area, certain wire centers served by South Central Telephone Association, Inc. and Twin Valley Telephone, Inc., as well as additional wire centers served by SWBT and Embarq.³

3. Designation as an ETC requires a carrier must make certain showings required under federal law.⁴ For an expansion of a carrier’s ETC service area to be approved, the new service area must also be in the public interest.⁵

4. To make a public interest showing for both federal and state ETC designation purposes, the Commission requires the potential ETC to show:

- a. The carrier is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.⁶

³Amended Application to Expand Designation as an [sic] Lifeline-Only Eligible Telecommunications Carrier, ¶ 6, Apr. 16, 2024 (“Application”).

⁴R&R, pp. 2–3.

⁵The Commission will weigh certain factors to determine whether it is in the public interest to grant another carrier ETC status. Those factors include a) benefits of increased competitive choice; b) the impact of multiple ETC designations on the KUSF; c) the unique advantages and disadvantages of the carrier’s service offering; d) commitments made regarding quality of telephone service provided by competing providers; and e) the carrier’s ability to provide the supported services throughout the designated service area within a reasonable time frame. See Docket No. 04-RCCT-338-ETC, Order No. 14 Order Granting ETC Designation and Addressing Additional Issues, September 30, 2004 and Docket No. 04-ALKT-283-ETC, Order Granting ETC Designation and Addressing Additional Issues, September 24, 2004. The Commission will also consider any other relevant factors in determining whether ETC designation is in the public interest.

⁶See 47 § C.F.R. 54.201(h), 54.202(a)(4); Docket No. 10-GIMT-658-GIT, Order Requiring Lifeline-Only ETC Applicants to Provide Kansas-Specific Information and Requesting Comments on AT&T Refund Issue, June 21, 2012. The FCC has stated that relevant considerations for such a showing include: a) Whether the Applicant previously offered services to non-Lifeline consumers; b) How long the Company has been in business; c) Whether the Applicant intends to rely exclusively on USF disbursements to operate; d) Whether the Applicant receives or will receive revenue from other sources; and e) Whether the Company has been subject to enforcement action or an ETC revocation proceeding in any state. In Docket No. 10-GIMT-658-GIT, the Commission also stated that lifeline-only ETC

- b. The carrier has received approval of its Compliance Plan with the FCC (if applicable).
- c. The carrier undertakes efforts to eliminate waste, fraud, and abuse in the Lifeline program.
- d. The carrier has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes.⁷
- e. The carrier will provide service throughout its designated service area to all customers making a reasonable request for service.
- f. The carrier will comply with all applicable federal and state laws, rules, regulations, and orders. The carrier will inform the Commission of any changes in service made to comply with updated laws, rules, regulations, and orders.

5. On March 20, 2025, Commission staff (“Staff”) submitted its Report and Recommendation (“R&R”) which contains detailed findings from Staff’s analysis from its review of the Application.

6. The Commission adopts Staff’s R&R as findings herein and is attached hereto and made a part hereof by reference.

7. The Commission concludes that NTW’s expansion of its current ETC designation in the requested exchange areas for federal Lifeline program purposes is in the public interest by being a benefit to low-income Kansas consumers and therefore just and reasonable.

applicants should provide Kansas-specific information regarding technical and financial capacity similar to the information provided in the carrier’s FCC Compliance Plan.

⁷See Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designations of Eligible Telecommunications Carrier, October 2, 2006.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. Nex-Tech Wireless, LLC's ETC Application is approved. The company is granted ETC status in all the requested exchanges set forth in the third revised Exhibit B to the Staff's R&R.

B. NTW shall use federal and state Lifeline funds for their intended purpose, and the company shall pass the entire Lifeline credit through to consumers. Furthermore, the company shall abide by Lifeline-only ETC requirements adopted by this Commission, including annual ETC recertification requirements, and NTW shall comply with such requirements to continue to receive state and federal support.

C. NTW shall file in this docket within thirty (30) days of this order a revised advertisement including PACP contact information in the instant docket.

D. Staff shall update the Commission's map of certified telephone exchanges in the expansion area to reflect current telephone company exchange information.

E. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).⁸

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 04/10/2025



Celeste Chaney-Tucker
Executive Director

BWB

⁸ K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

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

FROM: Jorge Soto-Gomez, Telecommunications Analyst
Steve Garrett, Deputy Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: March 20, 2025

SUBJECT: Docket No. 24-NTWZ-672-ETC
In the Matter of the Application of Nex-Tech Wireless, LLC for Expansion of its
Designation as a Lifeline-Only Eligible Telecommunications Carrier.

EXECUTIVE SUMMARY:

On April 12, 2024, Nex-Tech Wireless, LLC. (Nex-Tech Wireless) filed an application with the Kansas Corporation Commission (Commission) to expand its designation as an Eligible Telecommunications Carrier (ETC) in seventy exchanges/wire centers in the state of Kansas for the purpose of receiving federal Lifeline support and providing service to eligible/qualifying consumers.

On April 16, 2024, Nex-Tech Wireless filed an amended application to correct an exhibit reference at paragraph 28 and include only the proposed expansion areas in Exhibit B. On February 7, 2025, Nex-Tech Wireless revised its Exhibit B to exclude previously approved exchanges per Staff's request. On February 14, 2025, Nex-Tech Wireless filed its 2nd revised Exhibit B and added exchanges inadvertently omitted from the application. On March 10, 2025, per Staff request and with Nex-Tech Wireless' conformity to changes, the inconsistencies found regarding the telephone company names & corresponding exchanges and the spelling of exchanges were addressed and a 3rd revised Exhibit B was filed.

Staff recommends Commission approval of Nex-Tech Wireless's application for the expanded designation as a Lifeline-Only ETC for the Universal Service Fund's (USF) Lifeline program within the specific seventy exchanges/wire centers. Nex-Tech Wireless's 3rd Revised Exhibit B as referenced within the application will be attached to this Report and Recommendation.

BACKGROUND:

The Federal and Kansas Telecommunications Acts contain provisions to develop universal service funds to maintain and advance universal service, which led to the establishment of the federal USF (“FUSF”) and the KUSF, respectively. The FUSF provides support through four programs of which includes the Lifeline program. The program assists low-income consumers by providing a discount on their monthly local telephone or internet charges so that telephone service is more affordable.

To be eligible to receive support from the FUSF, a carrier is required to be designated an ETC. A state commission may designate a carrier as an ETC in accordance with 47 U.S.C. § 214(e)(1), which requires:

A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received:

(A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution.

The Commission derives its authority to designate ETCs pursuant to 47 U.S.C. § 214(e)(2), which requires:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

The Commission derives its authority to order carrier or carriers to provide service to unserved community or portion thereof pursuant to 47 U.S.C. § 214(e)(3), which requires:

If no common carrier will provide the services that are supported by Federal universal service support mechanisms under section 254(c) of this title to an unserved community or any portion thereof that requests such service, the Commission, with respect to interstate services or an area served by a common carrier to which paragraph (6) applies, or a State commission, with respect to intrastate services, shall determine which common carrier or carriers are best able

to provide such service to the requesting unserved community or portion thereof and shall order such carrier or carriers to provide such service for that unserved community or portion thereof. Any carrier or carriers ordered to provide such service under this paragraph shall meet the requirements of paragraph (1) and shall be designated as an eligible telecommunications carrier for that community or portion thereof.

The Commission derives its authority to permit an eligible telecommunications carrier to relinquish its designation pursuant to 47 U.S.C. § 214(e)(4), which requires:

A State commission...shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission...of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission ... shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission ... shall establish a time, not to exceed one year after the State commission ... approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.

On July 15, 2005, Nex-Tech Wireless filed an Application in Docket No. 06-NTHHT-061-ETC to request designation as an ETC in the entire Golden Belt Telephone Association, Inc. (Golden Belt Telephone), Mutual Telephone Company (Mutual Telephone), Rural Telephone Service Company, Inc. (Rural Telephone) and S&T Telephone Cooperative Association, Inc. (S&T Telephone) study areas and many Southwestern Bell Telephone, LLC d/b/a AT&T Kansas (AT&T Kansas) formerly Southwestern Bell Telephone, L.P.¹ wire centers for the purpose of receiving FUSF support. On December 12, 2005, the Commission issued an Order granting Nex-Tech Wireless's request to be designated an ETC in the aforementioned areas for the purpose of receiving FUSF support. Ellsworth wire center was removed from consideration as it was outside Nex-Tech Wireless licensed area in the state of Kansas. On October 9, 2006, Nex-Tech Wireless filed an Application in Docket No. 07-NTHHT-360-ETC requesting ETC designation for KUSF support for the aforementioned areas where it was granted ETC designation for FUSF purposes. The Commission issued an Order granting Nex-Tech Wireless's request on December 22, 2006.

On March 8, 2007, Nex-Tech Wireless filed an Application in Docket No. 07-NTWZ-966-ETC requesting ETC designation in the Sharon Springs, Leoti, and Tribune wire centers in the Consolidated Communications of Kansas Company (Consolidated-Kansas) formerly Sunflower

¹ *Order Approving Name Change*, Docket No. 24-SWBT-546-CCN, May 7, 2024.

Telephone Co., Inc.² study areas for FUSF support. The Commission issued an Order granting Nex-Tech Wireless's request on July 11, 2007. On August 9, 2007, Nex-Tech Wireless filed an Application in Docket No. 08-NTWZ-172-ETC requesting ETC designation for KUSF support in the aforementioned areas where it was granted ETC designation for FUSF purposes. The Commission issued an Order granting Nex-Tech Wireless's request on December 13, 2007.

On March 3, 2008, Nex-Tech Wireless filed an Application in Docket No. 08-NTWZ-827-ETC requesting designation as an ETC for FUSF and KUSF support in the entire Gorham Telephone Company, Inc. (Gorham Telephone), H&B Communications, Inc. (H&B Communications), and Wilson Telephone Company, Inc. (Wilson Telephone) study areas; the Marienthal and Wallace wire centers in the Consolidated-Kansas study area; the Ellsworth, Lincoln, and Norcatur wire centers in the AT&T Kansas study area; and the Abbyville, Alden, Arlington, Belpre, Claflin, Hoisington, Hudson, Langdon, Macksville, Partridge, Pretty Prairie, Saint John, Sterling, and Sylvia wire centers in the Brightspeed of Southern Kansas Inc. formerly United Telephone Company of Southcentral Kansas d/b/a CenturyLink³ study area. Nex-Tech Wireless had acquired licenses to provide wireless service to additional markets in Kansas; thus, Nex-Tech Wireless was also seeking ETC designation for the new markets. The Commission issued an Order granting Nex-Tech Wireless' request on July 25, 2008.

On June 2, 2008, Nex-Tech Wireless filed an Application in Docket No. 08-NTWZ-1076-ETC requesting designation as an ETC for FUSF and KUSF support in the Geneseo wire center in the Home Telephone Company, Inc. (Home Telephone) study area and in the Ellinwood wire center in the Brightspeed of Kansas, LLC⁴ formerly CenturyLink study area. The Commission issued an Order granting Nex-Tech Wireless' request on October 17, 2008.

On August 4, 2010, Nex-Tech Wireless filed an Application in Docket No. 11-NTWZ-077-ETC requesting designation as an ETC for FUSF and KUSF support in the entire Cunningham Telephone Company, Inc. (Cunningham Telephone) study area; the Iuka and Turon wire centers in the South Central Telephone Association, Inc. (South Central Telephone) study area; the Aurora, Barnard, Bennington, Beverly, Clyde, Delphos, Glasco, Miltonvale, and Tescott wire centers in the Twin Valley Telephone Company, Inc. (Twin Valley Telephone) study area; the Conway, Windom, and Preston wire centers in respectively, Brightspeed of Eastern Kansas, LLC⁵ and Brightspeed of Southern Kansas Inc. study areas; and the Belleville, Beloit, Concordia, Jewell, Mankato, Marquette, Minneapolis, and Scandia wire centers in the AT&T Kansas study area. The Commission issued an Order granting Nex-Tech Wireless' request on February 17, 2011.

² *Order Approving Name Change*, Docket No. 19-SFLT-197-CCN, December 20, 2018.

³ *Order Approving Name Change*, Docket No. 24-USCT-205-CCN, September 5, 2023. Collectively known as both "Brightspeed Companies of Kansas" and trade name "Brightspeed" in the state of Kansas, it is currently comprised of separate legal entities, 4 ILECS and 1 CLEC, respectively: Brightspeed of Kansas, LLC; Brightspeed of Eastern Kansas, LLC; Brightspeed of Southern Kansas, Inc.; Brightspeed of West Missouri, LLC; and Brightspeed Broadband, LLC. After a series of name changes in 2023-2024, "Brightspeed" was formerly and collectively known as "United Telephone Companies of Kansas d/b/a CenturyLink" in the state of Kansas.

⁴ *Order Approving Name Change*, Docket No. 24-UTDT-476-CCN, May 7, 2024.

⁵ *Order Approving Name Change*, Docket No. 24-UTET-595-CCN, May 7, 2024.

ANALYSIS:

Nex-Tech Wireless is a Domestic Limited Liability Company formed under the laws of Kansas with its principal place of business located at 3001 New Way Blvd, Hays, Kansas 67601. Nex-Tech is in an “Active and Good Standing” status with the Kansas Secretary of State Office.⁶ Nex-Tech Wireless is composed of three companies. Nex-Tech Wireless provides wireless telecommunications services to consumers using the underlying networks of Nex-Tech, LLC, GBT Communications, Inc., and TC Wireless, LLC.⁷

Nex-Tech, LLC, is a wholly owned subsidiary of Rural Telephone of Lenora, Kansas. GBT Communications, Inc. is a wholly owned subsidiary of Golden Belt Telephone of Rush Center, Kansas. TC wireless, LLC is a wholly owned subsidiary of Tri-County Telephone Association, Inc. (Tri-County Telephone) of Council Grove, Kansas. Rural Telephone, Golden Belt Telephone, and Tri-County Telephone are rural incumbent local exchange carriers (RLECs) regulated by the KCC as public utilities. Each of these RLEC companies has established a subsidiary to operate business units outside the incumbent local exchange carrier (ILEC) service areas. The member-owners of Nex-Tech Wireless are these subsidiaries.⁸

Federal and State ETC Requirements

The statutes of the Federal Act mentioned earlier herein, 47 U.S.C. § 214(e)(1) and 47 U.S.C. § 214 (e)(2), provide information on how a carrier can be designated as an ETC. Congress empowered the states to designate a common carrier as an ETC. The Commission must evaluate Nex-Tech Wireless’ ability to meet the criteria set out in 47 U.S.C. § Section 214(e)(2). Nex-Tech Wireless requests ETC designation in several rural service areas, therefore, the Commission is required to make a public interest determination with regard to the service areas and Staff will provide a public interest recommendation.

In order to be designated as an ETC, a company must be a “common carrier” as defined in 47 U.S.C. § 153(11):

The term “common carrier” or “carrier” means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this chapter; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier.

Nex-Tech Wireless states that it meets this requirement because they provide mobile service as defined within 47 U.S.C, § 153 and therefore qualifies as a common carrier service. A company must be an ETC to qualify for Lifeline Support. Nex-Tech Wireless currently provides service as an ETC and telecommunications common carrier. Kansas law adopts the federal standards. The Commission, at this time, has not established additional state-specific criteria for ETC designation.

⁶ Kansas Secretary of State, Nex-Tech Wireless, LLC, <https://www.sos.ks.gov/eforms/BusinessEntity/Search.aspx>, Last viewed February 27, 2025.

⁷ Amended Application, ¶ 4.

⁸ *Id.* at ¶ 4.

In Staff's review of the application requesting expansion of its service area; Nex-Tech Wireless meets the federal definition of common carrier.

Service or Functionalities

The Federal Communications Commission (FCC) identified the services or functionalities that shall be supported by the federal universal service support mechanisms, pursuant to 47 U.S.C. § 254(c). The supported services are codified in 47 C.F.R. § 54.101(a), which reads as follows:

Voice Telephony services shall be supported by federal universal service support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

With regard to the local usage component, the Commission determined in its October 2, 2006, Order in Docket No. 06-GIMT-446-GIT (October 2nd Order) that it would follow the FCC's guidance and evaluate local usage by considering the comparability of a competitive ETC's offering on a case-by-case basis "by evaluating the total service package, including the local calling scope, included features, and usage that might otherwise be considered long distance." The Commission further stated that it would consider whether an ETC applicant offers unlimited calling to government, social service, health facilities, educational institutions and emergency numbers when considering comparability.⁹

Throughout its amended Application, Nex-Tech Wireless provided explanations of how it meets the aforementioned federal criteria for being designated an ETC. Nex-Tech Wireless also stated that it will meet the requirement by providing the supported services using its own facilities.

Voice Grade Access to the Public Switched Telephone Network (PTSN) – Nex-Tech Wireless stated it will provide voice grade access to the PSTN through interconnection arrangements with local telephone companies.¹⁰

Consistent with state and federal policies favoring universal service, Nex-Tech Wireless stated it will offer voice telephony services in the expanded areas using the same infrastructure and in the same manner in which it provides the supported services in its existing Kansas ETC service area. If it does not possess adequate infrastructure to provide supported services in an area, Nex-Tech Wireless stated it will "offer its functional equivalent through its interconnected VoIP service to its

⁹ *Order Adopting Requirements for Designation of Eligible Telecommunications Carriers*, Docket No. 06-GIMT-446-GIT, October 2, 2006, ¶¶ 7-8, p. 4-5.

¹⁰ Amended Application, ¶ 12 (A), p. 5.

subscribers”¹¹ and provide such services via roaming agreements with other carriers.¹²

Local Usage – Nex-Tech Wireless stated it will “offer stand-alone voice telephony service throughout its proposed expanded Lifeline-Only ETC designation area and will offer such service at rates that are reasonably comparable to urban rates.”¹³ Nex-Tech Wireless also stated, “the unlimited minutes of use for local service will be provided at no additional charge to end users.”¹⁴

Access to Emergency Services – Nex-Tech Wireless stated, “service will include access to emergency service via E-911, wherever available from local government or public safety organizations...”¹⁵

The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Nex-Tech Wireless will provide all of its customers with access to emergency service by dialing 911 in satisfaction of the basic 911 requirement, and either provides, or will provide subscribers with Phase I and Phase II E-911 services in accordance with any deployment schedules agreed to by Nex-Tech Wireless and local or other governmental emergency service provider agencies, to the extent that Nex-Tech Wireless receives a bona fide request for E-911 services.¹⁶

Toll Limitation – Nex-Tech Wireless also “commits to provide toll limitation services to qualifying low-income consumers as provided in 47 C.F.R. §§ 54.400-54.423.”¹⁷

Nex-Tech Wireless does not distinguish between toll and non-toll calls in the pricing of its services. As a result, toll limitation services do not need to be offered for any Lifeline service offered by Nex-Tech Wireless.¹⁸

Pursuant to 47 C.F.R. § 54.401(a)(2) Lifeline defined:

Toll limitation service does not need to be offered for any Lifeline service that does not distinguish between toll and non-toll calls in the pricing of the service. If an eligible telecommunications carrier charges Lifeline subscribers a fee for toll calls that is in addition to the per month or per billing cycle price of the subscribers' Lifeline service, the carrier must offer toll limitation service at no charge to its subscribers as part of its Lifeline service offering.

¹¹ *Id.*, ¶ 20, p. 9.

¹² *Id.*, ¶ 11 p. 5.

¹³ *Id.*, ¶ 12 (A), p. 5.

¹⁴ *Id.*, ¶ 20, p. 9.

¹⁵ *Id.*

¹⁶ *Id.*, ¶ 12 (D), p. 6.


¹⁷ *Id.*, ¶ 12 (E), p. 6.

¹⁸ *Id.*, ¶ 20, p. 9.

Nex-Tech Wireless states it will offer subsidized Lifeline voice and Broadband Internet Access Services¹⁹ to qualifying low-income consumers in accordance with the FCC's rules within its proposed expanded Lifeline-Only ETC designation area.²⁰ Nex-Tech Wireless' broadband offering would be eligible for federal Lifeline support but not state support as the Kansas Lifeline Service Program supports voice services only. Eligible customers would be able to apply the federal Lifeline credit to any broadband and/or voice plans by Nex-Tech Wireless.²¹ Nex-Tech Wireless' website includes plans eligible for the Lifeline discount and information on who qualifies and how they can apply.²² Nex-Tech Wireless will not collect a service deposit in order to initiate Lifeline for voice-only service plans and will not charge Lifeline customers a monthly number-portability charge.

The administrator of the Lifeline program, the Universal Service Administrative Company's (USACs), chart below outlines the current Lifeline service type options, and the federal Lifeline support amount associated with them. <https://www.usac.org/lifeline/rules-and-requirements/minimum-service-standards/>:

Service Type	Description	Lifeline Support Amount
Voice *	Subscriber is provided a Voice only service that meets the minimum service standards.	\$5.25
Broadband	Subscriber is provided a Broadband only service that meets the minimum service standards.	\$9.25
Bundled Voice *	Subscriber is provided a Voice and Broadband service that meets the Voice minimum service standards only.	\$5.25
Bundled Broadband	Subscriber is provided a Voice and Broadband service that meets the Broadband minimum service standards only.	\$9.25
Bundled Voice and Broadband	Subscriber is provided a Voice and Broadband service that meets both the Voice and Broadband minimum service standards.	\$9.25

*On July 30, 2024  the Wireline Competition Bureau (WCB), paused the phase-out of Lifeline support for voice-only services for an additional year. As such, the basic Lifeline support of \$5.25 remains available to eligible consumers who subscribe to voice-only service until at least December 1, 2025.

Nex-Tech Wireless states in paragraph 19 and 22 of its amended Application that it meets the current Minimum Service Standards and will also meet them while providing Lifeline supported services in the additional requested areas. The standard is updated on an annual basis and

¹⁹ "Broadband Internet Access Service" defined in 47 C.F.R. § 54.400 (L); Amended Application, ¶ 12 (B), p. 5.

²⁰ Amended Application, ¶ 12(C), p. 6; ¶ 19, p. 8.

²¹ *Id.*, ¶ 19, p. 8-9; *Order Adopting Requirements for Designation of Eligible Telecommunications Carrier*, Docket No. 06-GIMT-446-GIT, October 2, 2006, ¶ 77(e), p. 45.

²² "Assistance Programs Lifeline." *Nex-Tech Wireless.com*, <https://www.nex-techwireless.com/assistance-programs>. Accessed 12 Feb. 2025.

published in a Public Notice issued by the Wireline Competition Bureau on or before July 31, which gives the new minimum standard for the upcoming year. In order for service providers to receive reimbursement, Lifeline supported services must meet the FCC's Minimum Service Standards for voice and broadband speed and usage allowances, including annual updates to those standards and any future changes to the applicable rules. Beginning December 1, 2024, the federal Lifeline Minimum Service Standards for: mobile voice telephony service is 1,000 minutes of usage per month; mobile broadband data capacity of 4.5 GB per month at a speed of 3G or greater, until at least December 1, 2025; fixed broadband service at 1,230 GB per month of data at a speed of 25/3 Mbps or greater.²³

Nex-Tech Wireless proposed voice calling plans include unlimited local calling; therefore, Staff believes Nex-Tech Wireless local usage offering is comparable to the local usage offered by the incumbent providers. Staff is satisfied that Nex-Tech Wireless has demonstrated an ability to provide the service or functionalities supported by the universal service support systems and that its local usage component is comparable to that of the incumbent carrier.

Consumer Eligibility and Enrollment

The National Verifier is Lifeline's centralized application system. It determines whether consumers are eligible for Lifeline. USAC manages the National Verifier and provides customer service to consumers through the Lifeline Support Center. Nex-Tech Wireless will provide Lifeline service only to customers whose eligibility is confirmed via the National Verifier, which fully launched in Kansas on October 23, 2019. Customers wishing to enroll in Nex-Tech Wireless' Lifeline service will be instructed to apply either online or via U.S. Mail to the National Verifier.²⁴ Nex-Tech Wireless states that they accept and will meet all carrier obligations required of ETCs to offer Lifeline as set forth in 47 C.F.R. § 54.405 of the FCC's rules. Specifically, Nex-Tech Wireless will:²⁵

- A) Make available Lifeline service to qualifying low-income consumers.
- B) Publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.
- C) Indicate on all materials describing the Lifeline service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, that the service is non-transferable, that only eligible customers may enroll in the program, and that the program is limited to one discount per household.
- D) Disclose its name on all materials describing the service.
- E) De-enroll a Lifeline subscriber when Nex-Tech Wireless has a reasonable basis to believe that the Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer in compliance with Section 54.409 of the FCC's rules.

²³ *Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount*, Public Notice, FCC WC Docket No. 11-42, July 30, 2024; *Minimum Service Standards*, USAC, <https://www.usac.org/lifeline/rules-and-requirements/minimum-service-standards/>, Lasted viewed March 3, 2025.

²⁴ Amended Application, ¶ 23, p. 10-11.

²⁵ *Id.*, ¶ 21, p. 9-10.

Staff is satisfied that Nex-Tech Wireless will comply with federal rules that prohibit subscribers from receiving more than one Lifeline service per household.

Financially and Technically Capable

The FCC at 47 C.F.R. §§ 54.201 and 54.202 of its rules, which govern ETC designation, requires a carrier seeking designation as a Lifeline-Only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules. Specifically, 47 C.F.R. § 54.202(a)(4) requires an ETC to “...demonstrate that it is financially and technically capable of providing the Lifeline service . . .” and 47 C.F.R. § 54.201(h) provides:

A state commission shall not designate a common carrier as an eligible telecommunications carrier for purposes of receiving support only under subpart E (Lifeline) of this part unless the carrier seeking such designation has demonstrated that it is financially and technically capable of providing the supported Lifeline service in compliance with subpart E of this part.

The Commission requested comments in its March 27, 2012, Order in Docket No. 10-GIMT-658-GIT on what additional information should be provided by Lifeline-Only ETCs to demonstrate their financial and technical capacity. After reviewing the Comments filed, the Commission determined in its June 21, 2012, Order that:

The FCC requires Lifeline-Only ETC applicants to provide, in their Compliance Plan, a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier’s various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available. Lifeline-Only ETC applicants should file Kansas-specific information regarding financial and technical capacity similar to the information provided in the carrier’s FCC Compliance Plan when filing for Lifeline-Only ETC status in Kansas.

Nex-Tech Wireless has been in business since 2005 and was authorized by the Commission to offer ETC services. Since then, Nex-Tech Wireless has been granted additional FUSF & KUSF expansions in its ETC service areas in 2007, 2008 and 2011. Nex-Tech Wireless states it, “possesses the financial and technical capabilities to provide voice and broadband services throughout its proposed expanded ETC designation area. Nex-Tech Wireless is an established wireless provider and has been a competitive ETC in good standing since 2005.”²⁶

Staff is satisfied that Nex-Tech Wireless meets the FCC’s rules pursuant to 47 C.F.R. § 54.201 and 54.202 as being financially and technically capable to offer Lifeline-Only support in its requested service areas.

Types of Facilities Used to Provide Service

Nex-Tech Wireless was formed to develop a Personal Communications Service ("PCS") wireless telecommunications network, comprised of a wireless voice and data system. Nex-Tech Wireless

²⁶ *Id.*, ¶ 17, p. 8.

is currently licensed to provide wireless service in parts of the Denver, Omaha, Wichita and Kansas City Major Trading Areas (MTA) markets, encompassing all or part of forty-four counties in Kansas, pursuant to spectrum licenses issued by the FCC.²⁷

U.S.C. § 214 (e)(1)(A) states that ETCs shall offer services, at least in part, over their own facilities and 47 C.F.R. § 54.201(i) of the FCC's Rules prohibits state commissions from designating a telecommunications carrier as an ETC if it offers services exclusively through the resale of another carrier's services. Nex-Tech Wireless meets these requirements since it provides the supported services through its own facilities, including in the expanded areas. Staff is also satisfied that, in the event that it does not possess the adequate infrastructure to provide supported services in an area, Next-Teck Wireless will provide the services via roaming agreements with other carriers.²⁸ Nex-Tech Wireless will be eligible to receive the full amount of support designated for the ILEC wire centers.

Service Areas

Section 214(e)(5) of the Federal Act defines "service area" as:

The term "service area" means a geographic area established by a State commission for the purpose of determining universal service obligations and support mechanisms. In the case of an area served by a rural telephone company, "service area" means such company's "study area" unless and until the [Federal Communications] Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company.

"Service areas" or "operating areas" are defined by the state act in K.S.A. 66-1,187(k). K.S.A. 66-1,187(k) provides that:

- (1) In the case of a rural telephone company, operating area or service area means such company's study area or areas as approved by the federal communications commission; and
- (2) In the case of a local exchange carrier, other than a rural telephone company, operating area or service area means such carrier's local exchange service area or areas as approved by the commission.

Several RLECs are listed on the 3rd Revised Exhibit B and defined as a rural telephone company by Section 214(e)(5) of the Federal Act. Brightspeed Companies of Kansas are ILECs that serve rural communities in Kansas. AT&T Kansas is a non-rural telephone company in Kansas. The study area is the service area currently designated for universal service support for areas served by rural telephone companies and the wire center is the service area currently designated by the Commission for universal service support for areas served by non-rural telephone companies.

²⁷ *Id.*, ¶ 4, p. 2.

²⁸ *Id.*, ¶ 11, p. 5.

On April 15, 2013, the FCC released an Order²⁹ granting forbearance from the requirements of Section 47 U.S.C. § 214(e)(5) of the Act and Section 54.207(b) of the FCC's rules that the service area of an ETC conform to the service area of any rural telephone company serving the same area. The forbearance Order is limited to carrier's designation as a Lifeline-Only ETC and applies to any ETC that has been designated as Lifeline-Only or any existing ETC seeking a limited designation to participate in the Lifeline-Only program.

Forbearance in these limited circumstances merely removes the requirement to conform to the service area of any rural telephone company serving the same area for previously designated ETCs receiving Lifeline-Only support and carriers with pending or future ETC designation requests for Lifeline-Only support. The Commission may now designate Lifeline-Only ETCs in a "*portion*" of a rural service area without redefinition of that rural service area. However, the Commission is still required to consider the public interest, convenience and necessity of designating carriers as a competitive ETC in a rural area already served by a rural telephone company.³⁰

Nex-Tech Wireless provided a complete list of rural exchanges included in its amended application, detailed in 3rd Revised Exhibit B expanding its designation as an ETC in the state of Kansas. The revisions made to the application's Exhibit B were only to identify exchanges requested within this application and to correctly identify the names of the telephone companies and their corresponding exchanges. Nex-Tech Wireless' first revised Exhibit B of the application removed exchanges granted in prior dockets. The second revised Exhibit B of the application included new exchanges added to this docket. The final & third revised Exhibit B of the application corrected company names and the spelling of exchanges that were incorrect in the Commission's system. Staff reviewed the third revised Exhibit B and with Nex-Tech Wireless' conformity, found it is an accurate representation of Nex-Tech Wireless's requested expansion areas. Staff notes that the Commission's map of certified telephone exchanges will also need to be updated to reflect the current names of telephone companies & spelling of the exchanges.

The exchanges with an asterisk are Nebraska and Kansas cross-border exchanges. The designation of those exchanges with the asterisk is limited to the area that they cover within the state of Kansas. Anything that extends outside of the boundaries of the state of Kansas, the Commission would lack jurisdiction.

Staff is satisfied with the provided service area detail listed in 3rd Revised Exhibit B. Therefore, the Commission should authorize Nex-Tech Wireless to expand its ETC designation as a Lifeline-Only ETC within the areas requested.

Advertising

Section 214(e)(1)(B) of the Federal Act requires ETCs to advertise the availability of the supported services and the associated charges using media of general distribution.

Nex-Tech Wireless states, the company will advertise the availability of and charges for its supported service offerings using media of general distribution and will undertake outreach

²⁹ *Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform, Virgin Mobile USA, L.P., et al Petitions for Forbearance*, FCC 13-44 Order, April 15, 2013.

³⁰ 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(c).

initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements. Nex-Tech Wireless will offer and advertise its voice and broadband services through a combination of media channels, which may include newspaper, radio, social media, outdoor advertising, direct marketing, and/or its website.³¹

Docket No. 06-GIMT-446-GIT requires all Competitive ETCs to include contact information for the Commission's Public Affairs and Consumer Protection (PACP) in their advertisement, so the customer knows where to turn with questions and complaints. On January 30, 2025, Staff Discovery Request 1 (DR 1), Question 3 & 4, requested that Nex-Tech Wireless include additional information in its advertisement document³² for its Lifeline customers. In response to Staff DR 1, Nex-Tech Wireless indicated that it agrees to update its advertisement to include the phone number for the hearing and speech impaired, PACP's address, and PACP's email address in its advertising language. Staff believes these additions will publicize the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services.

Staff is satisfied that Nex-Tech Wireless will continue to meet the advertising requirement and requests that Nex-Tech Wireless file a revised advertisement in the instant docket.

Public Interest

In its amended application, Nex-Tech Wireless provided the following explanation of how it meets the public interest requirement:³³

...In connection with granting Nex-Tech Wireless' prior requests for designation as an ETC, the Commission reviewed Nex-Tech Wireless' representations, certifications, and commitments regarding Nex-Tech Wireless' service commitments and determined that Nex-Tech Wireless met all federal and state requirements and that it was in the public interest to grant the ETC application. **Nex-Tech Wireless hereby reaffirms its compliance with and commitment to each of the requirements delineated in its prior ETC applications.** (Emphasis added).

Staff acknowledges Nex-Tech Wireless' reaffirmation statement above.

The Commission determined in its October 2nd Order that, as part of its public interest evaluation, the Commission will require an ETC Applicant to demonstrate that it has sufficient back-up power to remain functional without external power in emergency situations, is able to reroute traffic around damaged facilities, and can manage emergency traffic spikes. With its long history as an ETC, Nex-Tech Wireless has proven its capability to handle emergencies. It is Staff's understanding that Nex-Tech Wireless certifies³⁴ in its amended application its network will continue to have the same ability to remain functional in emergencies.

The Company states that, "designation as a federal ETC in additional areas for Lifeline purposes will have minimal impact on universal service support mechanisms. Support will be paid only for the number of qualifying consumers who choose Nex-Tech Wireless' service. To the extent

³¹ Amended Application, ¶ 14, p. 7.

³² *Id.*

³³ *Id.*, ¶ 27-30, p. 11-12.

³⁴ *Id.*, ¶ 15, p. 7.

Lifeline service adds customers to the network, additional contributions to the respective support funds will offset a portion of the minimal increased demand on the federal USF.”³⁵

In paragraph 16 of the amended application, Nex-Tech Wireless states, it is not a signatory to Cellular Telecommunications Industry Association’s (CTIA) Consumer Code for Wireless Service (“CTIA Code”). Meaning those carriers who have voluntarily adopted the principles, disclosures, and practices of wireless service provided to individual consumers. However, consistent with the CTIA Code³⁶, Nex-Tech Wireless states they will:

- a) disclose the rates and terms of service to its customers;
- b) make clear on its website and in promotional materials where its service is generally available;
- c) provide contract terms to customers and confirm changes in service;
- d) disclose early termination fees;
- e) clearly and conspicuously disclose material charges and conditions related to the advertised prices and services;
- f) separately identify its charges from taxes on billing statements;
- g) provide customers the right to terminate service for changes to contract terms;
- h) provide ready access to customer service;
- i) promptly respond to consumer inquiries and complaints received from government agencies; and
- j) abide by a policy regarding the privacy of customer information in accordance with federal and state laws.

To guard against fraud, waste, and abuse of the Lifeline program, Nex-Tech Wireless uses the National Verifier. This ensures compliance with FCC rules designed to reach that objective. The company states in its amended application at paragraphs 24-26 that it will comply with:

- the annual certification requirements including the results of its re-certification efforts to the Commission;
- the recordkeeping requirements; and
- the annual reporting requirements, including the requirement to file such reports with the Commission.

After reviewing Nex-Tech Wireless’ amended application and DR 1 responses, Staff believes that Nex-Tech Wireless has demonstrated that it is in the public interest to designate it as an ETC in the requested service areas for the purpose of participating in the federal Lifeline program. Staff also believes the addition of Nex-Tech Wireless’s Lifeline service offerings will be a benefit to low-income Kansas consumers.

RECOMMENDATION:

Staff is satisfied that Nex-Tech Wireless has demonstrated its ability to meet the federal and state requirements for being designated as a Lifeline-Only ETC. Staff recommends the Commission

³⁵ *Id.*, ¶ 29-30, p. 12.

³⁶ “Consumer Code for Wireless Service”, *ctia.org*, <https://www.ctia.org/the-wireless-industry/industry-commitments/consumer-code-for-wireless-service>, Accessed 27 Feb. 2025.

grant Nex-Tech Wireless request to expand its designation as an ETC for federal Lifeline-Only support in all of the requested exchanges listed in the company's 3rd Revised Exhibit B.

Staff further recommends the Commission issue an Order requiring Nex-Tech Wireless to file a revised advertisement that includes PACP's contact information in this docket.

Additionally, Nex-Tech Wireless should be reminded that federal Lifeline funds must be used for their intended purpose, and the company shall pass the entire Lifeline credit through to the consumer. Nex-Tech Wireless should be aware that it is required to abide by Lifeline-Only ETC requirements adopted by this Commission, including annual ETC recertification requirements.

REVISED EXHIBIT B

**LIST OF WIRE CENTERS IN WHICH
NTW SEEKS EXPANDED DESIGNATION
AS A LIFELINE-ONLY
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Telephone Company Name**Exchange**

Benkelman Telephone Comanny	Benkelman*
Brightspeed of Kansas, LLC	Buhler
Brightspeed of Kansas, LLC	Burrton
Brightspeed of Eastern Kansas, LLC	Durham
Brightspeed of Kansas, LLC	Haven
Brightspeed of Kansas, LLC	Hillsboro
Brightspeed of Eastern Kansas, LLC	Inman
Brightspeed of Eastern Kansas, LLC	Lehigh
Citizens Tel. Co. of NE d/b/a Frontier Comm of NE	Franklin*
Citizens Tel. Co. of NE d/b/a Frontier Comm of NE	Naponee*
Citizens Tel. Co. of NE d/b/a Frontier Comm of NE	Republican City*
Consolidated Communications of KS	Weskan
Consolidated Communications of KS	Americus
Consolidated Communications of KS	Saffordville
Consolidated Communications of KS	Cedar Point
Council Grove Tel. Co.	Council Grove
Great Plains Communications, LLC	Chester*
Great Plains Communications, LLC	Byron*
Great Plains Communications, LLC	Red Cloud*
Hartman Telephone Exchanges, Inc.	Danbury*
Hartman Telephone Exchanges, Inc.	Haigler*
Home Tel. Co.	Salemsburg
Home Tel. Co.	Assaria
Home Tel. Co.	Roxbury
Home Tel. Co.	Galva
J.B.N Tel. Co.	Narka
J.B.N Tel. Co.	Munden
J.B.N Tel. Co.	Cuba
J.B.N Tel. Co.	Agenda
Madison Telephone LLC	Madison
Madison Telephone LLC	Lamont
Moundridge Tel. Co.	Goessel
Moundridge Tel. Co.	Moundridge
S and A Telephone	Allen
Southwestern Bell Telephone d/b/a AT&T	Abilene
Southwestern Bell Telephone d/b/a AT&T	Burns
Southwestern Bell Telephone d/b/a AT&T	Canton
Southwestern Bell Telephone d/b/a AT&T	Chapman
Southwestern Bell Telephone d/b/a AT&T	Cottonwood Falls
Southwestern Bell Telephone d/b/a AT&T	Emporia
Southwestern Bell Telephone d/b/a AT&T	Florence

Southwestern Bell Telephone d/b/a AT&T
Southwestern Bell Telephone d/b/a AT&T
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Southwestern Bell Telephone d/b/a AT&T
Southwestern Bell Telephone d/b/a AT&T
Southwestern Bell Telephone d/b/a AT&T
Southwestern Bell Telephone d/b/a AT&T
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Tri-County Tel. Assn.
Twin Valley Tel. Co.
Wheat State Tel. Co.
Wheat State Tel. Co.
Windstream Nebraska, Inc.
Windstream Nebraska, Inc.

Gypsum
Hartford
Herndon
Herington
Hutchinson
Lindsborg
Marion
McPherson
Peabody
Reading
Salina
Solomon
Woodbine
Dwight
White City
Navarre
Delavan
Hope
Carlton
Wilsey
Dunlap
Lost Springs
Ramona
Lincolnvile
Longford
Olpe
Matfield Green
Hardy*
Superior*

* Designation is sought for the portion of the exchange that is within Kansas. *Petition for Reconsideration of Western Wireless Corporation's Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, Order on Reconsideration, 16 FCC Rcd 19144, 19147-49, paras. 8-13 (2001) (*Western Wireless 2001 Order*), affirming *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 48, 57-59, paras. 23-24 (Com. Carrier Bur. 2000) (*Western Wireless 2000 Order*).

Exchanges corrected 3/10/2025

Windstream Nebraska, Inc.	Hardy
Windstream Nebraska, Inc.	Superior
Great Plains Communications, LLC	Red Cloud
Great Plains Communications, LLC	Chester
Great Plains Communications, LLC	Byron
Citizens Tel. Co. of NE d/b/a Frontier Comm of NE	Franklin
Citizens Tel. Co. of NE d/b/a Frontier Comm of NE	Naponee
Citizens Tel. Co. of NE d/b/a Frontier Comm of NE	Republican City
Hartman Telephone Exchanges, Inc.	Danbury
Hartman Telephone Exchanges, Inc.	Haigler
Brightspeed of Kansas, LLC	Buhler
Brightspeed of Kansas, LLC	Burrton
Brightspeed of Eastern Kansas, LLC	Durham
Brightspeed of Kansas, LLC	Haven
Brightspeed of Kansas, LLC	Hillsboro
Brightspeed of Eastern Kansas, LLC	Inman
Brightspeed of Eastern Kansas, LLC	Lehigh

CERTIFICATE OF SERVICE

24-NTWZ-672-ETC

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 04/10/2025.

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KCC Docket Room