

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Pat Apple, Chairman  
Shari Feist Albrecht  
Jay Scott Emler

In the Matter of the Audit of TAG Mobile, LLC by the )  
Kansas Universal Service Fund (KUSF) Administrator )  
Pursuant to K.S.A. 2015 Supp. 66-2010(b) For KUSF ) Docket No. 17-TAGC-029-KSF  
Operating Year 19, Fiscal Year March 2015-February )  
2016. )

PETITION OF TAG MOBILE, LLC FOR RECONSIDERATION OF  
THE ORDER ACCEPTING AND ADOPTING GVNW CONSULTING, INC.'S  
AUDIT REPORT AND RECOMMENDATIONS

COMES NOW, TAG Mobile, LLC ("TAG"), by and through its attorney, Richard W. Hird of Petefish, Immel, Hird, Johnson, Leibold & Sloan, LLP, and in accordance with K.S.A. 66-118b and K.S.A. 77-529, petitions the State Corporation Commission of the State of Kansas ("Commission") for reconsideration of the June 29, 2017 Order Accepting and Adopting GVNW Consulting, Inc.'s Audit Report and Recommendations in the above-captioned matter.

The specific grounds upon which TAG requests reconsideration are as follows:

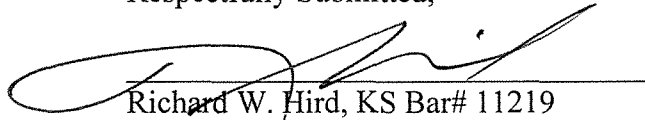
TAG requests reconsideration of the Commission's adoption of Audit Report Finding No. 3 on the basis that (1) the audit finding failed to take into account TAG's ownership of a switch during at least part of the audit period; and (2) the recommendation in the summary of the audit findings on page 3 was to require TAG to repay \$97,925.31 within sixty (60) days of the order, but the ordering language in paragraph D on page 6 of the Order requires payment within thirty (30) days.

TAG requests reconsideration of the Commission's adoption of Audit Report Finding No. 4 on the basis that (1) there is no evidence to find that TAG provided conflicting and contradictory

information to the auditor or that there was any intent to deceive; and (2) the findings are prejudicial to TAG in the 16-TAGC-323-SHO docket.

WHEREFORE, TAG Mobile, LLC respectfully requests reconsideration of the Commission's June 29, 2017 Order in accordance with the above and foregoing; and for such other and further relief as the Commission may deem appropriate.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Richard W. Hird', is written over a horizontal line.

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Attorneys for Respondent


## CERTIFICATE OF SERVICE

The undersigned certifies that on the 14<sup>th</sup> day of July, 2017, a true and correct copy of the foregoing Petition of TAG Mobile, LLC for Reconsideration of the Order Accepting and Adopting GVNW Consulting, Inc.'s Audit Report and Recommendations was attached to an email and sent to the following persons electronically and a copy was also mailed, First Class U.S. Mail postage prepaid, at the following addresses:

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