

**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 DISH)
Wireless L.L.C.'s Application for Designation)
as an Eligible Telecommunications Carrier in) Docket No. 23-DWLZ-676-ETC
the State of Kansas for the Limited Purpose of)
Providing Lifeline Service to Qualifying)
Customers.)

ORDER GRANTING LIFELINE ETC DESIGNATION

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 March 27, 2023, DISH Wireless L.L.C. dba Gen Mobile (DISH or company) filed an application with the Commission requesting designation as an Eligible Telecommunications Carrier (ETC) for purposes of federal and state Lifeline support throughout the State of Kansas.¹

2. On September 8, 2023, DISH amended its application "to include additional information and minor edits to the original application"² after receiving discovery requests from Staff regarding its original application.³

¹ Application of DISH Wireless L.L.C. for Designation as an Eligible Telecommunications Carrier in the State of Kansas for the Limited Purpose of Offering Lifeline Service to Qualified Households, ¶ 1, Mar. 27, 2023 (Application).

² First Amended Application of DISH Wireless L.L.C. for Designation as an Eligible Telecommunications Carrier in the State of Kansas for the Limited Purpose of Offering Lifeline Service to Qualified Households, ¶ 1, Sep. 8, 2023.

³ Staff's Report and Recommendation, (Jul. 25, 2025), p. 2-3.

3. In order to receive an ETC designation, the requesting carrier must make showings required under federal law.⁴ Pursuant to 47 U.S.C. § 214(e)(1)-(2), § 254(c), and 47 C.F.R. § 54.101(a), the carrier must make the following showings.

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

- a. The carrier will offer the services supported by federal universal service support mechanism under 47 U.S.C. § 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's service (including the services offered by another ETC) throughout the service area for which designation is received.⁵
- b. The carrier will advertise the availability of such services and the charges therefore using media of general distribution.⁶
- c. Designation will be consistent with the public interest, convenience, and necessity.⁷

5. In order to make a public interest showing for both federal and state ETC designation, 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.⁸

⁴ *Id.*

⁵ See 47 C.F.R. § 54.101(a).

⁶ 47 U.S.C. § 214(e)(1)(B).

⁷ The 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 take into account any other relevant factors in determining whether ETC designation is in the public interest.

⁸ See 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 applicants should provide Kansas-specific information regarding technical and financial capacity similar to the information provided in the carrier's FCC Compliance Plan.

- 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.⁹
- 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.

6. Commission Staff (Staff) submitted a Report and Recommendation (R&R) regarding the Company's applications on July 25, 2025, attached hereto and made a part hereof by reference.¹⁰ Staff reviewed DISH's application and made findings in the R&R, which are incorporated herein by reference. For a detailed account of Staff's evidentiary showings, refer to the R&R. The Commission adopts Staff's R&R as additional findings.

7. Based on DISH's representations, Staff recommended approval of the application for its designation as a Lifeline ETC into the areas identified in Staff's Exhibit A attached to Staff's R&R.

8. Staff recommended the Commission require DISH to file a revised advertisement including the Commission's Public Affairs and Consumer Protection contact information in this docket within thirty (30) days.

⁹See Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designations of Eligible Telecommunications Carrier, October 2, 2006.

¹⁰ Staff's Report and Recommendation, Jul. 25, 2025. (R&R).

9. The Commission concludes granting DISH's application and the additional requirement set forth in paragraph 8, above, is just and reasonable.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. DISH Wireless L.L.C. dba Gen Mobile's ETC Application in this matter is approved. The company is granted Federal Lifeline-only ETC status in the exchanges and wire centers identified in Exhibit A to Staff's Report & Recommendation.

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

C. DISH Wireless L.L.C. dba Gen Mobile shall file in this docket within thirty (30) days of this order a revised advertisement including the Public Affairs and Consumer Protection contact information in the instant docket.

D. 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).¹¹

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 07/31/2025



Celeste Chaney-Tucker
Executive Director

AAL

¹¹K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).



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Andrew J. French, Chairperson
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Annie Kuether, Commissioner

Laura Kelly, Governor

REPORT AND RECOMMENDATION UTILITIES DIVISION

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

From: Steve Garrett, Deputy Chief of Telecommunications
Janet Buchanan, Deputy Director of Utilities
Justin Grady, Director of Utilities

Date: July 25, 2025

Subject: Docket No. 23-DWLZ-676-ETC
In the Matter of DISH Wireless L.L.C. Application for Designation as an Eligible Telecommunications Carrier in the State of Kansas for the Limited Purpose of Providing Lifeline Service to Qualifying Customers.

EXECUTIVE SUMMARY

On March 27, 2023, DISH Wireless L.L.C. dba Gen Mobile (“DISH” or the “Company”) filed an application with the Kansas Corporation Commission (Commission) for designation as an Eligible Telecommunications Carrier (ETC) throughout the State of Kansas for federal and state Lifeline purposes (Application).¹ On September 8, 2023, DISH filed an Amended Application for designation as an ETC.²

Commission Staff (Staff) conducted a review of the Company’s Application and issued several data requests to gather information necessary for evaluation of DISH’s request. Based on the review of information provided by DISH, Staff concludes that DISH meets the requirements to be designated as an ETC for receipt of federal and state Lifeline support for exchanges and wire centers identified in Staff Exhibit A attached to this Report and Recommendation (R&R).

BACKGROUND

On March 27, 2023, DISH filed its Application seeking federal and Kansas Lifeline-only ETC designation to qualifying customers in the zip codes identified in Exhibit 3 to its Application. Staff issued five Discovery Requests (DR) numbered KCC-1, KCC-2, KCC-3, KCC-4, and KCC-5 (KCC-1 - 5) to DISH in June 2023. DISH’s local counsel contacted Commission Staff concerning the DRs and through that discussion DISH’s counsel proposed to file an Amended Application

¹ Application of DISH Wireless, LLC d/b/a Gen Mobile for Designation as an Eligible Telecommunications Carrier, March 27, 2023.

² First Amended Application, September 8, 2023.

since Staff's DRs addressed material shortcomings with the Application. On September 8, 2023, DISH filed an Amended Application to address material issues in the original Application. Additionally, DISH's local counsel and Staff agreed that responses to DRs KCC-1 - 5 would be submitted to Staff per discussion in June 2023. Staff received responses to DRs KCC-1 - 5 on May 19, 2025. On February 26, 2025, Staff issued Discovery Request Number KCC-6 seeking clarification on items related to identifying whose services DISH will use for resale, a detailed service area with wire centers, and updates to the proposed Lifeline Plans that changed over the last year to accurately reflect the new rates. Staff received DISH's response to KCC-6 on February 28, 2025.

DISH is a Colorado limited liability company with a principal address at 9601 S. Meridian Blvd, Englewood, CO 80112.³ DISH's parent company, DISH Network Corporation (DISH Network), also headquartered in Colorado, provides an array of services, including satellite television and internet services. In 2020, DISH Network entered the retail wireless telecommunications industry as a result of pre-paid asset divestiture by Sprint as a condition of the T-Mobile/Sprint merger.⁴ In 2021, the company acquired the Gen Mobile brand and customer assets.

Lifeline service is among the services supported through the Federal Universal Service Fund (FUSF) and the Kansas Universal Service Fund (KUSF), which were established through the Federal and Kansas Telecommunications Acts respectively. The Lifeline program assists low-income consumers by providing a discount on their monthly local telephone charges so that the telephone service is more affordable.

To be eligible to receive support from the FUSF and KUSF, a carrier is required to be designated as 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 therefore using media of general distribution.

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

³ *Id.*, p. 2

⁴ Stipulation and Order, United States of America et al., Plaintiffs, v. Deutsche TeleKon AG, T-Mobile US, Inc., Softbank Group Corp, and Sprint Corporation, Defendants, Case No. 1:19-cv-02232, July 26, 2019.

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.

Additionally, Kansas law (K.S.A. 66-2008(b)), adopts the federal standards contained in 47 U.S.C. § 214(e)1. Specifically, K.S.A. 66-2008(b) states:

Pursuant to the federal act, distributions from the KUSF shall be made in a competitively neutral manner to qualified telecommunications public utilities, telecommunications carriers and wireless telecommunications providers, that are deemed eligible both under subsection (e)(1) of section 214 of the federal act and by the commission.

The Federal Communications Commission (FCC) has set forth the services which are to be supported by the FUSF in rural, insular and high-cost areas. These services are found in 47 C.F.R. §54.101, which states:

(a) Services designated for support. Voice Telephony services and broadband services shall be supported by federal universal service support mechanisms.

(1) 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 charges 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.

(2) Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.⁵

Finally, an ETC is also subject to the requirements of the following FCC rules set out in 47 C.F.R. §§ 54.201, 54.202, 54.203, 54.205, 54.207, 54.408, and 54.410.⁶

⁵ 47 C.F.R. § 54.101.

⁶ Part 54 – Universal Service Subpart C – Carriers Eligible for Universal Service Support

ANALYSIS

In reviewing DISH's request for ETC designation, Staff issued DRs KCC-1 - 5 in June 2023. Staff and DISH's local counsel held a meeting to discuss these DRs and determined that there were material deficiencies in the original Application and that an amended application would need to be filed. During this meeting it was also determined that responses to DRs KCC-1 – 5 would still be provided to Staff and the responses would either identify the page and paragraph in the amended application addressing the DR or provide a response to the question. Staff requested various information such as additional information about the proposed service, Lifeline plans schedule, and DISH commitment to providing subscribers using its own facilities or combination of its own facilities and another provider's facilities consistent with K.S.A. 66-2008 and Section 214 of the Federal Telecommunications Act. On September 8, 2023, DISH filed an Amended Application to address the material deficiencies Staff identified in the original Application. Staff and DISH's local counsel again conducted several discussions related to the Amended Application and the DRs during 2024 and 2025 and DISH responded to DRs KCC-1 - 5 on May 19, 2025. On February 26, 2025, Staff issued DR KCC-6 (KCC-6) requesting clarification on items related to identifying the carrier DISH will use for resale, a detailed service area with wire centers, and proposed Lifeline Plans that changed over the last year to accurately reflect the new rates. On February 28, 2025, DISH responded to KCC-6.

Any Company operating in Kansas is required to register with the Kansas Secretary of State's Office. Staff confirmed DISH Wireless LLC is registered with the Kansas Secretary of State's Office, with status of "active and in good standing."⁷ DISH is also registered as a Commercial Mobile Radio Service (CMRS) provider with the FCC and as of July 10, 2025, and Kansas is listed as a jurisdiction in which DISH plans to provide telecommunication services.⁸

Federal and State ETC Requirements

Pursuant to 47 U.S.C. § 214(e)(1), a common carrier designated as an ETC shall be eligible to receive universal service support in accordance with § 254 of the Federal Act and shall, throughout the service area for which the designation is received: (A) offer the services that are supported by the Federal universal service support mechanism under § 254(c) of the Federal Act, using its own facilities or a combination of its own facilities and resale of another carrier's service (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and charges using media of general distribution.

The Federal Act, § 214(e)(2), empowers States to designate a common carrier as an ETC, stating:

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.

⁷ Kansas Secretary of State Office, Business Entity Search, <https://www.kansas.gov/bess/flow/main.jsessionid=F08D6ED923DCACB7B9C57299CE3D1E70.aptes03-inst1?execution=e1s5>, last viewed July 10, 2025.

⁸ Federal Communications Commission, Form 499 Filer Database, <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=833645>, last viewed July 10, 2025.

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.

DISH states it is a CMRS provider regulated pursuant to the common carrier requirements of the Federal Act and that it is a common carrier as defined by 47 U.S.C. § 153(11).⁹ Staff is satisfied that DISH meets the common carrier requirement to be designated as an ETC.

Service or Functionalities

The services or functionalities that shall be supported by the FUSF support mechanisms, pursuant to 47 U.S.C. § 254(c), are contained in 47 C.F.R. § 54.101. The FCC modified the definition of voice telephony service to recognize a technology-neutral approach to allow companies to provide voice services over any platform, including the Public Switched Telephone Network (PSTN) and Internet Protocol (IP) networks. Thus, 47 C.F.R. § 54.101, as amended, specifies the following functionalities of eligible voice telephony service:

Voice telephony services shall be supported by the 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.

The Commission determined that the evaluation of local usage will consider 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.”¹⁰ Consideration is also given to whether an ETC Applicant offers unlimited calling to anchor institutions.¹¹

DISH provided the following explanations of how it proposes to provide the required services or functionalities:

Voice-grade access to the public switched network or its functional equivalent

DISH will provide voice-grade access to the Public Switched Telecommunications Network (PSTN) or its functional equivalent, using AT&T and T-Mobile’s

⁹ Amended Application, p. 6.

¹⁰ Order Adopting Requirements for Designation of Eligible Telecommunications Carriers, ¶ 7, Docket No. 06-GIMT-446-GIT, Oct. 2, 2006 (06-446 Order).

¹¹ *Id.*, ¶ 7-8.

networks and the Company's own facilities once constructed.¹²

Minutes of use for local service at no additional charge

DISH's Lifeline offering will provide 1,000 voice minutes, 1,000 text messages, and 5 gigabytes (GB) of data per month at a net cost of \$0.00 after application of the Lifeline and KUSF support. Customers residing on Federal recognized Tribal lands receive unlimited voice minutes and text messages and 20 GB of data per month at a net cost of \$0.00 after application of Lifeline Tribal and KUSF support. Customers will also be able to purchase additional minutes or data as needed.¹³

In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will be able to receive an upgraded handset at an additional charge or SIM card offer, as well as access to voice mail, caller I.D., call forwarding, 3-Way calling, and call waiting features at no additional charge. Customers may use their minutes to place domestic long distance call at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes.¹⁴

Access to emergency services

DISH customers will have access to emergency calling services at the time Lifeline service is initiated and 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.¹⁵ Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.¹⁶

Toll limitation

The Company offers toll limitation services to qualifying low-income consumers.¹⁷

Broadband Internet Access Service (BIAS)

DISH's Lifeline plan, will include 5.0 GB of data per month, the Company further affirms that Gen Mobile Lifeline supported broadband services will meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward.¹⁸

Staff is satisfied that DISH has demonstrated the capability to provide the required services or functionalities for Federal Lifeline Program purposes.

The following table, found on the website of the Universal Service Administrative Company (USAC), outlines the current Lifeline service type options, and the federal Lifeline support amount

¹² Amended Application, p. 6.

¹³ *Id.*, p. 12.

¹⁴ *Ibid.*

¹⁵ *Id.*, p. 6-7.

¹⁶ *Id.*, p. 12.

¹⁷ *Id.*, p. 6.

¹⁸ *Id.*, p. 11.

associated with them.¹⁹ Currently, Lifeline support offered through the KUSF is \$7.77 for voice service. DISH will offer various plans with prices that vary depending on whether the customer chooses to include a data plan and the amount of data selected.

Federal Lifeline Support Amounts

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.

Minimum Service Standards - Usage Requirements

An ETC receiving Lifeline support must offer voice, broadband, or a package of voice and broadband services to low-income consumers. Wireless Lifeline service 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. Effective beginning December 1, 2025, the Federal Lifeline Program Minimum Standards for mobile voice service is 1,000 minutes of usage per month and 4.5 GB²⁰ of data, at a speed of 3G or greater.²¹

DISH states its Lifeline service plan includes 1,000 minutes of usage, 1,000 text messages, and 5.0 GB of data per month which is in compliance with the FCC's Federal Lifeline Program requirements.²² Its customers may purchase additional monthly minutes and/or data from the Company as needed. The Company states its Lifeline service offering "will meet or exceed" the Minimum Service Standards required by 47 C.F.R. § 54.408 and updated by the FCC on a going-forward basis.

¹⁹ <https://www.usac.org/lifeline/rules-and-requirements/minimum-service-standards/>.

²⁰ *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Rel. July 1, 2025.

²¹ Public Notice, Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount, WC Docket No. 11-42, DA 22-800, Rel. July 29, 2022; and USAC, Minimum Service Standards, <https://www.usac.org/lifeline/rules-and-requirements/minimum-service-standards/#Voice>, last viewed July 11, 2025.

²² Discovery Request No. KCC-3, dated May 19, 2025.

Staff is satisfied that DISH has the ability to provide the minimum service standards for voice and broadband services supported by the Federal Lifeline Program.

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), established 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), which provides:

- (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;
- (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.

DISH requests a Lifeline-only ETC designation throughout the State of Kansas, including in the study areas served by the Rural Local Exchange Carriers (RLECs), Southwestern Bell Telephone Company, LLC d/b/a AT&T Kansas (AT&T Kansas), the Brightspeed Companies of Kansas (Brightspeed).

For federal purposes, the RLECs are rate-of-return regulated and, prior to 2013, a competitive ETC had to serve an RLEC’s entire study area or a smaller portion of an RLEC’s study area if the Commission and the FCC approved a redefined service area for the competitive ETC. In 2013, the FCC determined that a carrier designated as a Lifeline-only ETC may serve an area smaller than an RLEC’s study area (e.g. exchange), specifically stating:

[W]e grant limited forbearance from the requirement of section 214(e)(5) of the Act and section 54.207(b) of the Commission’s rules that the service area of an eligible telecommunications carrier (ETC) conform to the service area of any rural telephone company serving the same area. In particular, this grant of forbearance applies to any ETC that has been designated by a state or the Commission, as well as pending and future requests by telecommunications carriers that seek limited designation, as an ETC to participate only in the Lifeline program (Lifeline-only ETC).²³

²³ Memorandum Opinion and Order, *In the Matter of Telecommunications Carriers Eligible for Support*, WC Docket No. 09-197, *Lifeline and Link Up Reform*, WC Docket No. 11-42, April 8, 2013.

For federal purposes, AT&T Kansas and Brightspeed are non-rural local exchange carriers (LECs) and a competitive ETC may request Lifeline ETC designation at the exchange, wire center or census block level.

On April 15, 2013, the FCC released an Order²⁴ granting forbearance from the requirements of Section 47 U.S.C. § 214(e)(5) of the Act and 47 C.F.R. § 54.207(b) 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 a 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.²⁵

DISH seeks ETC designation for the limited purpose of providing Lifeline service under the brand name "Gen Mobile" to qualifying Kansas consumers, including those consumers residing on federally recognized Tribal lands within the State of Kansas listed in Exhibit 3 of the Application.²⁶ Staff's review of the map that DISH provided believes it to be an accurate representation of the proposed service areas in this Application.

Advertising

Eligibility for Federal USF support is addressed by Section 214(e) of the Federal Act and, pursuant to § 214(e)(1)(B), an ETC must:

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

DISH states it will advertise the availability of Gen Mobile branded voice, text messaging, and broadband services through various marketing channels that may include direct mail, email, local and community outreach events, and targeted online electronic advertising. In addition, the availability of Gen Mobile Lifeline service will be publicized in ways that are reasonably designed to reach those who will likely qualify for the service. The Company's marketing efforts will be consistent with and in compliance with the Commission's rules. Samples of the Company's Lifeline advertising are included as Exhibit 4 of the application.²⁷

In addition to the FCC's advertising requirements, this Commission requires an ETC to develop "meaningful language so that consumers will understand what they can expect from an ETC."²⁸

²⁴ *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.

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

²⁶ Application, ¶ IV, D.

²⁷ Application, p. 8-9.

²⁸ 06-446 Order, ¶ 12.

The Commission determined that all ETCs shall include contact information for the Commission's Office of Public Affairs and Consumer Protection (PACP) in its advertisements to make sure that customers know where to turn with questions and complaints.

Accordingly, DISH is provided with suggested language by Staff in this R&R, which Staff is requesting it use, in its advertising for the Kansas ETC areas. Staff requests that DISH file a revised advertisement in the instant docket incorporating Kansas Corporation Commission, Office of Public Affairs and Consumer Protection contact information. The suggested language is as follows:

For unresolved questions or complaints, you may contact the state commission in your state. Contact information is:

DISH provides Lifeline service throughout its service territory. Customers may contact the Kansas Corporation Commission, Office of Public Affairs and Consumer Protection with any concerns, at address 1500 SW Arrowhead Road, Topeka, KS 66604, through email: kcc.public.affairs@ks.gov or call toll-free 1-(800)-662-0027 or in Topeka (785)- 271-3140. Hearing or speech impaired TTY Kansas Relay Center 1-(800)-766-3777.

Staff is satisfied that DISH will meet the advertising requirements and requests that DISH file a revised advertisement in the instant docket.

Public Interest

The FCC, in its Virginia Cellular Order,²⁹ made findings regarding the determination of the public interest. In this Order, the FCC determined that the “. . .value of increased competition, by itself, is not sufficient to satisfy the public interest test in rural areas.”³⁰ The FCC indicated it would consider the following in evaluating the public interest:

- the benefits of increased competition;
- the impact of multiple designations on the universal service fund;
- the unique advantages and disadvantages of the applicant's service offering;
- any commitments made regarding quality of service; and
- the applicant's ability to provide the supported services throughout the designated service area within a reasonable amount of time.³¹

While the FCC's decision is not binding on this Commission, the Commission found in its ALLTEL³² and RCC Minnesota³³ Orders that examination of the additional factors enumerated in the FCC's Order is reasonable. In its Application, DISH provided the following explanation to

²⁹ *In the Matter of Federal State Joint Board on Universal Service: Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Released: January 22, 2004 (Virginia Cellular Order), FCC Docket No. DA 03-338.

³⁰ *Id.*, ¶ 4.

³¹ *Id.*

³² *Order Granting ETC Designation and Addressing Additional Issues*, Docket No. 04-ALKT-283-ETC, dated Sept. 24, 2004, ¶ 28.

³³ *Order No. 14: Granting ETC Designation and Addressing Additional Issues.*, Docket No. 04-RCCT-338-ETC, dated Sept. 9, 2004, ¶ 26.

support a finding that it would be in the public interest for the company to be designated as an ETC for Lifeline Support:

Benefits of Increased Competitive Choice – DISH’s designation as a Lifeline-only ETC will help low-income consumers have more provider choices and available service options.³⁴ The increase in the number of providers available to consumers may also reduce the number of consumers that are not connected to the PSTN, thereby increasing the penetration rate.

Unique Advantages of DISH’s Service Offering – DISH states, Company service plans alleviate customer concerns regarding deposits, hidden costs, monthly charges that change, and long-term contracts. Gen Mobile prepaid plans allow customers to subscribe to voice, text, and data services without the requirement of a credit check or contract. DISH also states that mobile services are preferred by Lifeline eligible consumers who may be able to afford only a single connection, may change residences or places of work, and may need the ability to connect with prospective employers. Additionally, some of these individuals may be experiencing homelessness and rely upon Lifeline service as their single source of connectivity.³⁵

Commitments Made Regarding High-quality Telecommunications Services – DISH will provide services through its underlying carriers, AT&T and T-Mobile. DISH will use the National Verifier and NLAD to determine Lifeline eligibility and will comply with reporting requirements.³⁶ The Company will also meet or exceed the FCC’s Minimum Service Standards for Lifeline services, updated annually and going-forward.³⁷

Ability to Provide Supported Services Throughout the Designated Service Area Within a Reasonable Time Frame – DISH will provide service in Kansas using AT&T and T-Mobile as its underlying carriers, whose networks are built out and operational.³⁸ The Company, therefore, will be able to begin offering its Lifeline plan shortly after Commission approval.³⁹

Consumer Protection and Service Quality Standards

DISH states it will satisfy the consumer protection and quality of service standards set forth in 47 C.F.R. § 54.202(a)(3) through the Cellular Telecommunications and Internet Association’s (CITA) Consumer Code for Wireless Service.⁴⁰

Staff is satisfied that DISH will comply with all applicable consumer protection and service quality standards for universal service programs.

³⁴ Amended Application, V., p. 17.

³⁵ *Id.*, p. 16.

³⁶ *Id.*, p. 18.

³⁷ *Id.*, p. 15.

³⁸ *Id.*, p. 12.

³⁹ *Id.*, p. 13.

⁴⁰ Application, p. 10.

Emergency Situation Functionality

DISH states the Company's services will remain functional in emergency situations as required by 47 C.F.R. § 54.202(a)(2). DISH's greenfield 5G network operates in a cloud-environment that is not encumbered by traditional technology and will be more flexible and resilient in the event of service outages once the construction is complete. Currently, DISH relies on mobile virtual network operator (MVNO) partner networks that are designed to remain functional even without external power sources, are able to re-route traffic around damaged facilities, and can manage traffic spikes that may occur in emergency situations.⁴¹

Financial and Technical Capabilities

The Federal Act, § 54.201 and § 54.202, require a carrier seeking wireless Lifeline-only ETC designation to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the Federal Low-Income Program rules. Specifically, 47 C.F.R. § 54.202(a)(4) requires an ETC to "[d]emonstrate 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 FCC's relevant considerations for such showing include whether the applicant offers non-Lifeline services to consumers, the length of time the Company has been in business, whether the applicant will rely exclusively on USF disbursements and receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.⁴²

DISH currently uses AT&T and T-Mobile wireless facilities to provide wireless services in all 50 states and the territories of Washington, DC and Puerto Rico, including bundled voice, text messaging, and broadband services. DISH currently holds wireless ETC in Alabama, Alaska, Arizona, Arkansas, California, Colorado, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New York, North Dakota, Ohio, Oklahoma, Rhode Island, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.⁴³ DISH is also authorized by the California Public Utilities Commission to provide California Lifeline service.⁴⁴

While Gen Mobile service plans are currently supported by AT&T and T-Mobile networks, DISH plans to build out an advanced nationwide 5G network of its own. The Company continues to deploy its 5G broadband service that services over 130 cities (including in Kansas) and offers

⁴¹ Amended Application, I. ¶ 21.

⁴² Report and Order and Further Notice of Proposed Rulemaking, ¶ 388, *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Rel. February 6, 2012.

⁴³ Discovery Request KCC-6, Question 6.

⁴⁴ Amended Application, p. 3-4

service to more than 70 percent of the U.S. population.⁴⁵ DISH will offer Gen Mobile branded services that are designated for federal universal support using a combination of its own facilities, as constructed, and/or resale of another carrier's services.

DISH, further states that the proposed Lifeline offerings will be overseen by a team of personnel with substantial industry experience with the requirements of the federal Lifeline program and marketing to the low-income consumer sector. Exhibit 6 in the application shows a current list of the Company's key personnel responsible for Gen Mobile-branded Lifeline offerings, with biographical information demonstrating the expertise necessary to provide such services.⁴⁶

The company has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout Kansas. The company further affirms that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including updates going forward. Gen Mobile-branded Lifeline supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including service speed and data usage allowance, including updates going forward. To the extent DISH does provide a device for use with Lifeline supported broadband service, devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and DISH will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.⁴⁷

DISH's revised proposed Lifeline service offerings, showing that Lifeline customers can receive 1,000 voice minutes, 1,000 text messages, and 5 gigabytes (GB) of data per month at a net cost of \$0.00 after application of Lifeline and KUSF support and customers residing on federally recognized Tribal lands can receive unlimited voice minutes and text messages and 20 GB of data per month at a net cost of \$0.00 after application of Lifeline Tribal and KUSF support.⁴⁸ Customers will also be able to purchase additional minutes or data as needed. In addition to wholly-supported or discounted wireless services, prepaid Lifeline customers will be able to receive an upgraded handset at an additional charge or SIM card offer, as well as access to additional features such as voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customer minutes may be used to place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.⁴⁹

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. DISH will use multiple outreach methods including nonprofit partnerships,

⁴⁵ See DISH Press Release, The DISH 5G Network is Now Available to Over 70 Percent of the U.S. Population, June 15, 2023. See also Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time, *Order of Modification and Extension of Time to Construct*, DA 20-1072 WT Docket 18-197 (rel. Sept. 11, 2020).

⁴⁶ Amended Application, p. 43-44.

⁴⁷ *Id.*, p. 11-12

⁴⁸ Discovery Request KCC-6, Question 7

⁴⁹ Amended Application, ¶ 26, p. 12

phone, online, and in person enrollments through Lifeline events. FCC Section 54.410 rules require ETCs to certify and verify a Lifeline customer's initial and continued eligibility. DISH Wireless will rely on the National Verifier and the National Lifeline Accountability Database ("NLAD"), both administered by the Universal Service Administrative Company ("USAC"), to determine an applicant's eligibility for Lifeline service. DISH will require all Gen Mobile's Lifeline applicants to complete Lifeline application forms within the National Verifier. The standard Lifeline application complies with the requirements in 47 C.F.R. § 54.410(d).

For applicants verified as being eligible by USAC's National Verifier and NLAD, DISH will complete enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. In addition, at the time of enrollment, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days in order to maintain their Lifeline benefit.

DISH will also comply with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and will coordinate with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC administered benefit transfers and failure to re-certify.⁵⁰

DISH states that it is financially stable and capable of honoring its service obligations to customers, as shown in application's Exhibit 5⁵¹, a link to the Form 10-K of DISH Network, parent company of DISH. The Company will not rely exclusively on revenues from the provision of Lifeline services for its operating revenues. The Company's financial resources position the Company to expand its operations to serve currently unserved/underserved eligible low-income Kansas consumers and increase competition, including those residing on Tribal lands.

The statements and financial exhibits provided indicate that DISH has the ability to meet the financial ability to offer Lifeline services. DISH has been in the TV market since 1980 providing video services; therefore, it will not rely exclusively on universal service funding to operate. Staff is satisfied that DISH 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.

911 and Enhanced 911 Requirements

The FCC requires all non-facilities-based telecommunications carriers seeking Lifeline-only ETC designation to comply with certain 911 and enhanced 911 (E911) public safety requirements.⁵²

DISH states it will provide, "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

⁵⁰ *Id.*, p. 12-13.

⁵¹ *Id.*, p. 29.

⁵² Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, Feb. 6, 2012 (2012 Lifeline Reform Order), 27 FCC Rcd at 6814, 6819, ¶ 373, ¶ 389. The Wireline Competition Bureau subsequently provided guidance for submitted compliance plans in the Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, Public Notice, 27 FCC Rcd 2186 (WCB 2012 Compliance Plan Guidance)

government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.”⁵³

Staff is satisfied DISH is able to meet the FCC’s requirements for 911 and E911 services.

Compliance Plan Requirements

The FCC requires all non-facilities-based telecommunications carriers seeking Lifeline-only ETC designation to file and receive FCC approval of a Compliance Plan that provides specific information regarding the carrier, its service offerings, and that outlines the measures the carrier will take to implement its obligations.⁵⁴ The Compliance Plan must demonstrate the provider’s ability to meet the FCC’s requirements. A revised Compliance Plan must be filed when ownership or control of the ETC changes and the FCC must approve the revised Compliance Plan prior to a transfer of ownership or change in control of the ETC occurring.⁵⁵

In light of the FCC’s actions, the Commission determined:

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.⁵⁶

DISH has deployed its advanced nationwide 5G broadband service in over 130 cities (including Kansas) and currently offers service to more than 70 percent of the U.S. population. The deployment of services includes its own network and where its own network is not yet available or where the company does not yet offer Lifeline products on its own network, DISH, including under the Gen Mobile brand, will provide service on a resale basis.⁵⁷ In response to Staff Discovery Request No. KCC-6 (KCC-6), Staff requested DISH identify which entity(ies) they will utilize for resale. DISH stated they intend to use AT&T and T-Mobile as underlying partner carriers for resale.

Staff is satisfied that DISH meets the facilities-based requirements in Kansas, therefore there is no need for DISH to obtain an approved FCC Compliance Plan in accordance with the *2012 Lifeline Reform Order*.⁵⁸

⁵³ Application, p. 6.

⁵⁴ 2012 Lifeline Reform Order, ¶ 373, ¶ 389; WCB 2012 Compliance Plan Guidance.

⁵⁵ Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Universal Service Support, Public Notice, 29 FCC Rcd 9144, 9145 (WCB 2014) (2014 ETC Public Notice).

⁵⁶ Order Requiring Lifeline-Only ETC Applicants to Provide Kansas Specific Information and Requesting Comments on AT&T Refund Issue, ¶ 6, Docket No. 10-GIMT-658-GIT, June 21, 2012.

⁵⁷ Amended Application, p. 7-8

⁵⁸ See *2012 Lifeline Reform Order*, ¶ 368.

Facilities Used to Provide Service

For Federal Lifeline Program purposes, an ETC may offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier's service, including the services offered by another ETC.⁵⁹ The FCC, in its 2012 Lifeline Reform Order, authorizes a wireless Lifeline-only ETC to provide services without using any of its own facilities, as follows:

We forbear, on our own motion, from applying the Act's facilities requirement of section 214(e)(1)(A) to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program, subject to certain conditions noted below. For the reasons explained below, we find that all three prongs of section 10(a) are satisfied and that, as a result, the Commission will forbear from the "own-facilities" requirement contained in section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions: (1) the carrier must comply with certain 911 requirements, as explained below; and (2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.⁶⁰

DISH states that it has deployed and continues to deploy, its advanced nationwide 5G broadband service in over 130 cities (including in Kansas). In areas of Kansas where DISH's own network is not yet available or where the company does not yet offer Lifeline products on its own network, DISH will provide service on a resale basis. Therefore, DISH will offer services that are designated for federal universal support using a combination of its own facilities and/or resale of another carrier's services.⁶¹

RECOMMENDATION

Staff recommends the Commission grant DISH Federal Lifeline-only ETC designation in the exchanges and wire centers identified in Staff Exhibit A. Staff is satisfied that DISH has demonstrated its ability to meet the federal and state requirements to be designated as a Lifeline-only ETC in the proposed service areas.

Staff contends that DISH has demonstrated that it is in the public interest to seek its ETC designation in the requested service areas for the purpose of participating in the federal and state Lifeline program. Such designation will provide additional choices for low-income consumers' telecommunications needs.

DISH should be reminded that federal and state Lifeline funds must be used for their intended purpose, and DISH shall pass the entire Lifeline credit through to the consumer.

Additionally, DISH should be aware that it is required to abide by Lifeline-only ETC requirements adopted by this Commission, including annual ETC recertification requirements, and DISH will

⁵⁹ 47 U.S.C. § 214(e)(1)

⁶⁰ 2012 Lifeline Reform Order, ¶ 368.

⁶¹ Amended Application, ¶ 15, p. 7-8

be required to follow these to continue to receive state and federal support. Failure to comply with any FCC or Commission order, regulations, or rule may result in revocation of the Company's Lifeline-only ETC designation.

Staff recommends the Commission issue an Order granting DISH's request to seek its Lifeline ETC designation in the service area identified in Staff Exhibit A. Additionally, Staff recommends the Commission require DISH to file a revised advertisement including the Public Affairs and Consumer Protection contact information in the instant docket.

23-DWLZ-676-ETC**Staff Exhibit A**

OBJECTID	RCName	RCCode	AbName_St	State
5218	ABBYVILLE PLEVNA	ABBYVLPLVN	ABBYVLPLVN_KS	KS
5219	ABILENE	ABILENE	ABILENE_KS	KS
5220	AGENDA	AGENDA	AGENDA_KS	KS
5221	AGRA	AGRA	AGRA_KS	KS
5222	ALBERT	ALBERT	ALBERT_KS	KS
5223	ALDEN	ALDEN	ALDEN_KS	KS
5224	ALEXANDER	ALEXANDER	ALEXANDER_KS	KS
5225	ALLEN	ALLEN	ALLEN_KS	KS
5226	ALMA	ALMA	ALMA_KS	KS
5227	ALMENA	ALMENA	ALMENA_KS	KS
5228	ALTA VISTA	ALTA VISTA	ALTA VISTA_KS	KS
5229	ALTAMONT	ALTAMONT	ALTAMONT_KS	KS
5230	ALTON	ALTON	ALTON_KS	KS
5231	ALTOONA	ALTOONA	ALTOONA_KS	KS
5232	AMERICUS	AMERICUS	AMERICUS_KS	KS
5233	ANDALE	ANDALE	ANDALE_KS	KS
5234	ANTHONY	ANTHONY	ANTHONY_KS	KS
5235	ARCADIA	ARCADIA	ARCADIA_KS	KS
5236	ARGONIA	ARGONIA	ARGONIA_KS	KS
5237	ARKANSAS CITY	ARKANSASCY	ARKANSASCY_KS	KS
5238	ARLINGTON	ARLINGTON	ARLINGTON_KS	KS
5239	ARMA	ARMA	ARMA_KS	KS
5240	ASHLAND	ASHLAND	ASHLAND_KS	KS
5241	ASSARIA	ASSARIA	ASSARIA_KS	KS
5242	ATCHISON	ATCHISON	ATCHISON_KS	KS
5243	ATHOL	ATHOL	ATHOL_KS	KS
5244	ATLANTA	ATLANTA	ATLANTA_KS	KS
5245	ATTICA	ATTICA	ATTICA_KS	KS
5246	ATWOOD	ATWOOD	ATWOOD_KS	KS
5247	AURORA	AURORA	AURORA_KS	KS
5248	AXTELL	AXTELL	AXTELL_KS	KS
5249	BALDWIN	BALDWIN	BALDWIN_KS	KS
5250	BARNARD	BARNARD	BARNARD_KS	KS
5251	BARNES	BARNES	BARNES_KS	KS
5252	BARTLETT	BARTLETT	BARTLETT_KS	KS
5253	BASEHOR	BASEHOR	BASEHOR_KS	KS
5254	BAXTER SPRINGS	BAXTER SPG	BAXTER SPG_KS	KS
5255	BAZINE	BAZINE	BAZINE_KS	KS
5256	BEATTIE	BEATTIE	BEATTIE_KS	KS
5257	BEAUMONT	BEAUMONT	BEAUMONT_KS	KS
5258	BEELER	BEELER	BEELER_KS	KS
5259	BELLE PLAINE	BELLEPLAIN	BELLEPLAIN_KS	KS
5260	BELLEVILLE	BELLEVILLE	BELLEVILLE_KS	KS
5261	BELOIT	BELOIT	BELOIT_KS	KS
5262	BELPRE	BELPRE	BELPRE_KS	KS

5263	BENDENA	BENDENA	BENDENA_KS	KS
5264	BENEDICT	BENEDICT	BENEDICT_KS	KS
5265	BENNINGTON	BENNINGTON	BENNINGTON_KS	KS
5266	BENTON	BENTON	BENTON_KS	KS
5267	BEVERLY	BEVERLY	BEVERLY_KS	KS
5268	BIG BOW	BIG BOW	BIG BOW_KS	KS
5269	BIRD CITY	BIRD CITY	BIRD CITY_KS	KS
5270	BISON	BISON	BISON_KS	KS
5271	BLUE RAPIDS/WATERVILI	BLRP-WTVL	BLRP-WTVL_KS	KS
5272	BLUE MOUND	BLUE MOUND	BLUE MOUND_KS	KS
5273	BLUFF CITY	BLUFF CITY	BLUFF CITY_KS	KS
5274	BONNER SPRINGS	BONNER SPG	BONNER SPG_KS	KS
5275	BRAZILTON	BRAZILTON	BRAZILTON_KS	KS
5276	BREWSTER	BREWSTER	BREWSTER_KS	KS
5277	BRONSON	BRONSON	BRONSON_KS	KS
5278	BROOKVILLE	BROOKVILLE	BROOKVILLE_KS	KS
5279	BROWNELL	BROWNELL	BROWNELL_KS	KS
5280	BUCKEYE	BUCKEYE	BUCKEYE_KS	KS
5281	BUCKLIN	BUCKLIN	BUCKLIN_KS	KS
5282	BUCYRUS	BUCYRUS	BUCYRUS_KS	KS
5283	BUFFALO	BUFFALO	BUFFALO_KS	KS
5284	BUHLER	BUHLER	BUHLER_KS	KS
5285	BURDEN	BURDEN	BURDEN_KS	KS
5286	BURDETT	BURDETT	BURDETT_KS	KS
5287	BURLINGAME	BURLINGAME	BURLINGAME_KS	KS
5288	BURLINGTON	BURLINGTON	BURLINGTON_KS	KS
5289	BURNS	BURNS	BURNS_KS	KS
5290	BURR OAK	BURR OAK	BURR OAK_KS	KS
5291	BURRTON	BURRTON	BURRTON_KS	KS
5292	BUSHTON	BUSHTON	BUSHTON_KS	KS
5293	CALDWELL	CALDWELL	CALDWELL_KS	KS
5294	CAMBRIDGE	CAMBRIDGE	CAMBRIDGE_KS	KS
5295	CANEY	CANEY	CANEY_KS	KS
5296	CANTON	CANTON	CANTON_KS	KS
5297	CARLTON	CARLTON	CARLTON_KS	KS
5298	CASSODAY	CASSODAY	CASSODAY_KS	KS
5299	CAWKER CITY	CAWKERCITY	CAWKERCITY_KS	KS
5300	CEDAR VALE	CEDAR VALE	CEDAR VALE_KS	KS
5301	CEDAR POINT	CEDARPOINT	CEDARPOINT_KS	KS
5302	CENTRALIA	CENTRALIA	CENTRALIA_KS	KS
5303	CENTROPOLIS	CENTROPOLS	CENTROPOLS_KS	KS
5304	CHANUTE	CHANUTE	CHANUTE_KS	KS
5305	CHAPMAN	CHAPMAN	CHAPMAN_KS	KS
5306	CHASE	CHASE	CHASE_KS	KS
5307	CHENEY	CHENEY	CHENEY_KS	KS
5308	CHEROKEE	CHEROKEE	CHEROKEE_KS	KS
5309	CHERRYVALE	CHERRYVALE	CHERRYVALE_KS	KS
5310	CHETOPA	CHETOPA	CHETOPA_KS	KS
5311	CIMARRON	CIMARRON	CIMARRON_KS	KS

5312	CIRCLEVILLE	CIRCLEVL	CIRCLEVL_KS	KS
5313	CLAFLIN	CLAFLIN	CLAFLIN_KS	KS
5314	CLAY CENTER	CLAYCENTER	CLAYCENTER_KS	KS
5315	CLEARWATER	CLEARWATER	CLEARWATER_KS	KS
5316	CLIFTON	CLIFTON	CLIFTON_KS	KS
5317	CLINTON	CLINTON	CLINTON_KS	KS
5318	CLYDE	CLYDE	CLYDE_KS	KS
5319	COATS	COATS	COATS_KS	KS
5320	COFFEYVILLE	COFFEYVL	COFFEYVL_KS	KS
5321	COLBY	COLBY	COLBY_KS	KS
5322	COLDWATER	COLDWATER	COLDWATER_KS	KS
5323	COLLYER	COLLYER	COLLYER_KS	KS
5324	COLONY	COLONY	COLONY_KS	KS
5325	COLUMBUS RURAL	COLUBSRURL	COLUBSRURL_KS	KS
5326	COLUMBUS	COLUMBUS	COLUMBUS_KS	KS
5327	CONCORDIA	CONCORDIA	CONCORDIA_KS	KS
5328	CONWAY	CONWAY	CONWAY_KS	KS
5329	CONWAY SPRINGS	CONWAY SPG	CONWAY SPG_KS	KS
5330	COOLIDGE	COOLIDGE	COOLIDGE_KS	KS
5331	COPELAND	COPELAND	COPELAND_KS	KS
5332	CORBIN	CORBIN	CORBIN_KS	KS
5333	CORNING	CORNING	CORNING_KS	KS
5334	COTTONWOOD FALLS	COTONWDFLS	COTONWDFLS_KS	KS
5335	COUNCIL GROVE	COUNCILGRV	COUNCILGRV_KS	KS
5336	COURTLAND	COURTLAND	COURTLAND_KS	KS
5337	COYVILLE	COYVILLE	COYVILLE_KS	KS
5338	CRESTLINE	CRESTLINE	CRESTLINE_KS	KS
5339	CUBA	CUBA	CUBA_KS	KS
5340	CULLISON	CULLISON	CULLISON_KS	KS
5341	CUNNINGHAM	CUNNINGHAM	CUNNINGHAM_KS	KS
5342	DAMAR	DAMAR	DAMAR_KS	KS
5343	DE SOTO	DE SOTO	DE SOTO_KS	KS
5344	DEERFIELD	DEERFIELD	DEERFIELD_KS	KS
5345	DELAVAN	DELAVAN	DELAVAN_KS	KS
5346	DELIA	DELIA	DELIA_KS	KS
5347	DELPHOS	DELPHOS	DELPHOS_KS	KS
5348	DENISON	DENISON	DENISON_KS	KS
5349	DENMARK	DENMARK	DENMARK_KS	KS
5350	DENTON	DENTON	DENTON_KS	KS
5351	DEVON	DEVON	DEVON_KS	KS
5352	DEXTER	DEXTER	DEXTER_KS	KS
5353	DIGHTON	DIGHTON	DIGHTON_KS	KS
5354	DODGE CITY	DODGE CITY	DODGE CITY_KS	KS
5355	DORRANCE	DORRANCE	DORRANCE_KS	KS
5356	DOUGLASS	DOUGLASS	DOUGLASS_KS	KS
5357	DOWNS	DOWNS	DOWNS_KS	KS
5358	DUNLAP	DUNLAP	DUNLAP_KS	KS
5359	DURHAM	DURHAM	DURHAM_KS	KS
5360	DWIGHT	DWIGHT	DWIGHT_KS	KS

5361	EASTON	EASTON	EASTON_KS	KS
5362	EDGERTON	EDGERTON	EDGERTON_KS	KS
5363	EDMOND	EDMOND	EDMOND_KS	KS
5364	EDNA	EDNA	EDNA_KS	KS
5365	EFFINGHAM	EFFINGHAM	EFFINGHAM_KS	KS
5366	EL DORADO	EL DORADO	EL DORADO_KS	KS
5367	ELGIN	ELGIN	ELGIN_KS	KS
5368	ELK CITY	ELK CITY	ELK CITY_KS	KS
5369	ELK FALLS	ELK FALLS	ELK FALLS_KS	KS
5370	ELKHART	ELKHART	ELKHART_KS	KS
5371	ELLINWOOD	ELLINWOOD	ELLINWOOD_KS	KS
5372	ELLIS	ELLIS	ELLIS_KS	KS
5373	ELLSWORTH	ELLSWORTH	ELLSWORTH_KS	KS
5374	ELWOOD	ELWOOD	ELWOOD_KS	KS
5375	EMMETT	EMMETT	EMMETT_KS	KS
5376	EMPORIA	EMPORIA	EMPORIA_KS	KS
5377	ENGLEWOOD	ENGLEWOOD	ENGLEWOOD_KS	KS
5378	ENSIGN	ENSIGN	ENSIGN_KS	KS
5379	ERIE	ERIE	ERIE_KS	KS
5380	ESBON	ESBON	ESBON_KS	KS
5381	ESKRIDGE	ESKRIDGE	ESKRIDGE_KS	KS
5382	EUDORA	EUDORA	EUDORA_KS	KS
5383	EUREKA	EUREKA	EUREKA_KS	KS
5384	EVEREST	EVEREST	EVEREST_KS	KS
5385	FAIRVIEW	FAIRVIEW	FAIRVIEW_KS	KS
5386	FALL RIVER	FALL RIVER	FALL RIVER_KS	KS
5387	FARLINGTON	FARLINGTON	FARLINGTON_KS	KS
5388	FLORENCE	FLORENCE	FLORENCE_KS	KS
5389	FONTANA	FONTANA	FONTANA_KS	KS
5390	FORD	FORD	FORD_KS	KS
5391	FORMOSO	FORMOSO	FORMOSO_KS	KS
5392	FORT SCOTT	FORT SCOTT	FORT SCOTT_KS	KS
5393	FOWLER	FOWLER	FOWLER_KS	KS
5394	FRANKFORT	FRANKFORT	FRANKFORT_KS	KS
5395	FREDONIA	FREDONIA	FREDONIA_KS	KS
5396	FREEPORT	FREEPORT	FREEPORT_KS	KS
5397	FULTON	FULTON	FULTON_KS	KS
5398	GALATIA	GALATIA	GALATIA_KS	KS
5399	GALENA	GALENA	GALENA_KS	KS
5400	GALESBURG	GALESBURG	GALESBURG_KS	KS
5401	GALVA	GALVA	GALVA_KS	KS
5402	GARDEN PLAIN	GARDEN PL	GARDEN PL_KS	KS
5403	GARDEN CITY	GARDENCITY	GARDENCITY_KS	KS
5404	GARDNER	GARDNER	GARDNER_KS	KS
5405	GARFIELD	GARFIELD	GARFIELD_KS	KS
5406	GARNETT	GARNETT	GARNETT_KS	KS
5407	GAYLORD	GAYLORD	GAYLORD_KS	KS
5408	GENESEO	GENESEO	GENESEO_KS	KS
5409	GEUDA SPRINGS	GEUDA SPG	GEUDA SPG_KS	KS

5410	GIRARD	GIRARD	GIRARD_KS	KS
5411	GLASCO	GLASCO	GLASCO_KS	KS
5412	GLEN ELDER	GLEN ELDER	GLEN ELDER_KS	KS
5413	GODDARD	GODDARD	GODDARD_KS	KS
5414	GOESSEL	GOESSEL	GOESSEL_KS	KS
5415	GOFF	GOFF	GOFF_KS	KS
5416	GOODLAND	GOODLAND	GOODLAND_KS	KS
5417	GORHAM	GORHAM	GORHAM_KS	KS
5418	GOVE	GOVE	GOVE_KS	KS
5419	GRAINFIELD	GRAINFIELD	GRAINFIELD_KS	KS
5420	GREAT BEND	GREAT BEND	GREAT BEND_KS	KS
5421	GREELEY	GREELEY	GREELEY_KS	KS
5422	GREEN	GREEN	GREEN_KS	KS
5423	GREENLEAF	GREENLEAF	GREENLEAF_KS	KS
5424	GREENSBURG	GREENSBURG	GREENSBURG_KS	KS
5425	GRENOLA	GRENOLA	GRENOLA_KS	KS
5426	GRIDLEY	GRIDLEY	GRIDLEY_KS	KS
5427	GRINNELL	GRINNELL	GRINNELL_KS	KS
5428	GYPSUM	GYPSUM	GYPSUM_KS	KS
5429	HADDAM	HADDAM	HADDAM_KS	KS
5430	HALLOWELL	HALLOWELL	HALLOWELL_KS	KS
5431	HALSTEAD	HALSTEAD	HALSTEAD_KS	KS
5432	HAMILTON	HAMILTON	HAMILTON_KS	KS
5433	HANOVER HOLLENBERG	HANOVRRHNBG	HANOVRRHNBG_KS	KS
5434	HANSTON	HANSTON	HANSTON_KS	KS
5435	HARDTNER	HARDTNER	HARDTNER_KS	KS
5436	HARPER	HARPER	HARPER_KS	KS
5437	HARTFORD	HARTFORD	HARTFORD_KS	KS
5438	HARVEYVILLE	HARVEYVL	HARVEYVL_KS	KS
5439	HAVANA	HAVANA	HAVANA_KS	KS
5440	HAVEN	HAVEN	HAVEN_KS	KS
5441	HAVENSVILLE	HAVENSVL	HAVENSVL_KS	KS
5442	HAVILAND	HAVILAND	HAVILAND_KS	KS
5443	HAYS	HAYS	HAYS_KS	KS
5444	HAZELTON	HAZELTON	HAZELTON_KS	KS
5445	HEALY	HEALY	HEALY_KS	KS
5446	HEPLER	HEPLER	HEPLER_KS	KS
5447	HERINGTON	HERINGTON	HERINGTON_KS	KS
5448	HERNDON	HERNDON	HERNDON_KS	KS
5449	HESSTON	HESSTON	HESSTON_KS	KS
5450	HEWINS	HEWINS	HEWINS_KS	KS
5451	HIATTVILLE	HIATTVILLE	HIATTVILLE_KS	KS
5452	HIAWATHA	HIAWATHA	HIAWATHA_KS	KS
5453	HIGHLAND	HIGHLAND	HIGHLAND_KS	KS
5454	HILL CITY	HILL CITY	HILL CITY_KS	KS
5455	HILLSBORO	HILLSBORO	HILLSBORO_KS	KS
5456	HILLSDALE	HILLSDALE	HILLSDALE_KS	KS
5457	HOISINGTON	HOISINGTON	HOISINGTON_KS	KS
5458	HOLTON	HOLTON	HOLTON_KS	KS

5459	HOLYROOD	HOLYROOD	HOLYROOD_KS	KS
5460	HOME	HOME	HOME_KS	KS
5461	HOPE	HOPE	HOPE_KS	KS
5462	HORTON	HORTON	HORTON_KS	KS
5463	HOWARD	HOWARD	HOWARD_KS	KS
5464	HOXIE	HOXIE	HOXIE_KS	KS
5465	HOYT	HOYT	HOYT_KS	KS
5466	HUDSON	HUDSON	HUDSON_KS	KS
5467	HUGOTON	HUGOTON	HUGOTON_KS	KS
5468	HUMBOLDT	HUMBOLDT	HUMBOLDT_KS	KS
5469	HUNTER	HUNTER	HUNTER_KS	KS
5470	HURON	HURON	HURON_KS	KS
5471	HUTCHINSON	HUTCHINSON	HUTCHINSON_KS	KS
5472	INDEPENDENCE	INDEPNDNCE	INDEPNDNCE_KS	KS
5473	INGALLS	INGALLS	INGALLS_KS	KS
5474	INMAN	INMAN	INMAN_KS	KS
5475	IOLA	IOLA	IOLA_KS	KS
5476	IONIA	IONIA	IONIA_KS	KS
5477	ISABEL	ISABEL	ISABEL_KS	KS
5478	IUKA	IUKA	IUKA_KS	KS
5479	JAMESTOWN	JAMESTOWN	JAMESTOWN_KS	KS
5480	JENNINGS	JENNINGS	JENNINGS_KS	KS
5481	JETMORE	JETMORE	JETMORE_KS	KS
5482	JEWELL	JEWELL	JEWELL_KS	KS
5483	JOHNSON	JOHNSON	JOHNSON_KS	KS
5484	JUNCTION CITY	JUNCTIONCY	JUNCTIONCY_KS	KS
5485	KANORADO	KANORADO	KANORADO_KS	KS
5486	KANSAS CITY	KANSASCITY	KANSASCITY_KS	KS
5487	KENDALL	KENDALL	KENDALL_KS	KS
5488	KENSINGTON	KENSINGTON	KENSINGTON_KS	KS
5489	KINCAID	KINCAID	KINCAID_KS	KS
5490	KINGMAN	KINGMAN	KINGMAN_KS	KS
5491	KINSLEY	KINSLEY	KINSLEY_KS	KS
5492	KIOWA	KIOWA	KIOWA_KS	KS
5493	LA CROSSE	LA CROSSE	LA CROSSE_KS	KS
5494	LA CYGNE	LA CYGNE	LA CYGNE_KS	KS
5495	LA HARPE	LA HARPE	LA HARPE_KS	KS
5496	LAFONTAINE	LAFONTAINE	LAFONTAINE_KS	KS
5497	LAKE CITY	LAKE CITY	LAKE CITY_KS	KS
5498	LAKIN	LAKIN	LAKIN_KS	KS
5499	LANCASTER	LANCASTER	LANCASTER_KS	KS
5500	LANE	LANE	LANE_KS	KS
5501	LANGDON	LANGDON	LANGDON_KS	KS
5502	LARNED	LARNED	LARNED_KS	KS
5503	LATHAM	LATHAM	LATHAM_KS	KS
5504	LAWRENCE	LAWRENCE	LAWRENCE_KS	KS
5505	LAWTON	LAWTON	LAWTON_KS	KS
5506	LEAVENWORTH	LEAVENWTH	LEAVENWTH_KS	KS
5507	LEBANON	LEBANON	LEBANON_KS	KS

5508	LEBO	LEBO	LEBO_KS	KS
5509	LECOMPTON	LECOMPTON	LECOMPTON_KS	KS
5510	LEHIGH	LEHIGH	LEHIGH_KS	KS
5511	LENORA	LENORA	LENORA_KS	KS
5512	LEON	LEON	LEON_KS	KS
5513	LEONARDVILLE	LEONARDVL	LEONARDVL_KS	KS
5514	LEOTI	LEOTI	LEOTI_KS	KS
5515	LEROY	LEROY	LEROY_KS	KS
5516	LEVANT	LEVANT	LEVANT_KS	KS
5517	LEWIS	LEWIS	LEWIS_KS	KS
5518	LIBERAL	LIBERAL	LIBERAL_KS	KS
5519	LIBERTY	LIBERTY	LIBERTY_KS	KS
5520	LINCOLN	LINCOLN	LINCOLN_KS	KS
5521	LINCOLNVILLE	LINCOLNVL	LINCOLNVL_KS	KS
5522	LINDSBORG	LINDSBORG	LINDSBORG_KS	KS
5523	LINN	LINN	LINN_KS	KS
5524	LINWOOD	LINWOOD	LINWOOD_KS	KS
5525	LITTLE RIVER	LITTLE RIV	LITTLE RIV_KS	KS
5526	LOGAN	LOGAN	LOGAN_KS	KS
5527	LONGFORD	LONGFORD	LONGFORD_KS	KS
5528	LONG ISLAND	LONGISLAND	LONGISLAND_KS	KS
5529	LONGTON	LONGTON	LONGTON_KS	KS
5530	LOST SPRINGS	LOST SPG	LOST SPG_KS	KS
5531	LOUISBURG	LOUISBURG	LOUISBURG_KS	KS
5532	LUCAS	LUCAS	LUCAS_KS	KS
5533	LURAY	LURAY	LURAY_KS	KS
5534	LYNDON	LYNDON	LYNDON_KS	KS
5535	LYONS	LYONS	LYONS_KS	KS
5536	MACKSVILLE	MACKSVILLE	MACKSVILLE_KS	KS
5537	MADISON	MADISON	MADISON_KS	KS
5538	MAHASKA	MAHASKA	MAHASKA_KS	KS
5539	MANHATTAN	MANHATTAN	MANHATTAN_KS	KS
5540	MANKATO	MANKATO	MANKATO_KS	KS
5541	MANTER	MANTER	MANTER_KS	KS
5542	MAPLETON	MAPLETON	MAPLETON_KS	KS
5543	MARIENTHAL	MARIENTHAL	MARIENTHAL_KS	KS
5544	MARION	MARION	MARION_KS	KS
5545	MARQUETTE	MARQUETTE	MARQUETTE_KS	KS
5546	MARYSVILLE	MARYSVILLE	MARYSVILLE_KS	KS
5547	MATFIELD GREEN	MATFLDGREN	MATFLDGREN_KS	KS
5548	MAYETTA	MAYETTA	MAYETTA_KS	KS
5549	MAYFIELD	MAYFIELD	MAYFIELD_KS	KS
5550	MCCRACKEN	MCCRACKEN	MCCRACKEN_KS	KS
5551	MCCUNE	MCCUNE	MCCUNE_KS	KS
5552	MCDONALD	MCDONALD	MCDONALD_KS	KS
5553	MCLOUTH	MCLOUTH	MCLOUTH_KS	KS
5554	MCPHERSON	MCPHERSON	MCPHERSON_KS	KS
5555	MEADE	MEADE	MEADE_KS	KS
5556	MEDICINE LODGE	MEDICNLODG	MEDICNLODG_KS	KS

5557	MELVERN	MELVERN	MELVERN_KS	KS
5558	MENLO	MENLO	MENLO_KS	KS
5559	MERIDEN	MERIDEN	MERIDEN_KS	KS
5560	MICHIGAN VALLEY	MICHIGNVLY	MICHIGNVLY_KS	KS
5561	MILFORD	MILFORD	MILFORD_KS	KS
5562	MILTONVALE	MILTONVALE	MILTONVALE_KS	KS
5563	MINNEAPOLIS	MINNEAPOLS	MINNEAPOLS_KS	KS
5564	MINNEOLA	MINNEOLA	MINNEOLA_KS	KS
5565	MOLINE	MOLINE	MOLINE_KS	KS
5566	MONTEZUMA	MONTEZUMA	MONTEZUMA_KS	KS
5567	MORAN	MORAN	MORAN_KS	KS
5568	MORGANVILLE	MORGANVL	MORGANVL_KS	KS
5569	MORLAND	MORLAND	MORLAND_KS	KS
5570	MORRILL	MORRILL	MORRILL_KS	KS
5571	MORROWVILLE	MORROWVL	MORROWVL_KS	KS
5572	MOSCOW	MOSCOW	MOSCOW_KS	KS
5573	MOUND CITY	MOUND CITY	MOUND CITY_KS	KS
5574	MOUND VALLEY	MOUND VLY	MOUND VLY_KS	KS
5575	MOUNDRIDGE	MOUNDRIDGE	MOUNDRIDGE_KS	KS
5576	MOUNT HOPE	MOUNT HOPE	MOUNT HOPE_KS	KS
5577	MULBERRY	MULBERRY	MULBERRY_KS	KS
5578	MULLINVILLE	MULLINVL	MULLINVL_KS	KS
5579	MUNDEN	MUNDEN	MUNDEN_KS	KS
5580	MURDOCK	MURDOCK	MURDOCK_KS	KS
5581	MUSCOTAH	MUSCOTAH	MUSCOTAH_KS	KS
5582	NARKA	NARKA	NARKA_KS	KS
5583	NASHVILLE	NASHVILLE	NASHVILLE_KS	KS
5584	NATOMA	NATOMA	NATOMA_KS	KS
5585	NAVARRE	NAVARRE	NAVARRE_KS	KS
5586	NEODESHA	NEODESHA	NEODESHA_KS	KS
5587	NEOSHO FALLS	NEOSHO FLS	NEOSHO FLS_KS	KS
5588	NESS CITY	NESS CITY	NESS CITY_KS	KS
5589	NETAWAKA	NETAWAKA	NETAWAKA_KS	KS
5590	NEWTON	NEWTON	NEWTON_KS	KS
5591	NICKERSON	NICKERSON	NICKERSON_KS	KS
5592	NORTH MANCHESTER	NOMANCHETR	NOMANCHETR_KS	KS
5593	NORCATUR	NORCATUR	NORCATUR_KS	KS
5594	NORTON	NORTON	NORTON_KS	KS
5595	NORTONVILLE	NORTONVL	NORTONVL_KS	KS
5596	NORWICH	NORWICH	NORWICH_KS	KS
5597	OAKLEY	OAKLEY	OAKLEY_KS	KS
5598	OBERLIN	OBERLIN	OBERLIN_KS	KS
5599	OKETO	OKETO	OKETO_KS	KS
5600	OLATHE	OLATHE	OLATHE_KS	KS
5601	OLMITZ	OLMITZ	OLMITZ_KS	KS
5602	OLPE	OLPE	OLPE_KS	KS
5603	OLSBURG	OLSBURG	OLSBURG_KS	KS
5604	ONAGA	ONAGA	ONAGA_KS	KS
5605	OSAGE CITY	OSAGE CITY	OSAGE CITY_KS	KS

5606	OSAWATOMIE	OSAWATOMIE	OSAWATOMIE_KS	KS
5607	OSBORNE	OSBORNE	OSBORNE_KS	KS
5608	OSKALOOSA	OSKALOOSA	OSKALOOSA_KS	KS
5609	OSWEGO	OSWEGO	OSWEGO_KS	KS
5610	OTIS	OTIS	OTIS_KS	KS
5611	OTTAWA	OTTAWA	OTTAWA_KS	KS
5612	OVERBROOK	OVERBROOK	OVERBROOK_KS	KS
5613	OXFORD	OXFORD	OXFORD_KS	KS
5614	OZAWKIE	OZAWKIE	OZAWKIE_KS	KS
5615	PALCO	PALCO	PALCO_KS	KS
5616	PALMER	PALMER	PALMER_KS	KS
5617	PAOLA	PAOLA	PAOLA_KS	KS
5618	PARADISE	PARADISE	PARADISE_KS	KS
5619	PARKER	PARKER	PARKER_KS	KS
5620	PARSONS	PARSONS	PARSONS_KS	KS
5621	PARTRIDGE	PARTRIDGE	PARTRIDGE_KS	KS
5622	PAWNEE ROCK	PAWNEEROCK	PAWNEEROCK_KS	KS
5623	PAXICO	PAXICO	PAXICO_KS	KS
5624	PEABODY	PEABODY	PEABODY_KS	KS
5625	PERRY	PERRY	PERRY_KS	KS
5626	PHILLIPSBURG	PHILLIPSBG	PHILLIPSBG_KS	KS
5627	PIEDMONT	PIEDMONT	PIEDMONT_KS	KS
5628	PIQUA	PIQUA	PIQUA_KS	KS
5629	PITTSBURG	PITTSBURG	PITTSBURG_KS	KS
5630	PLAINS	PLAINS	PLAINS_KS	KS
5631	PLAINVILLE	PLAINVILLE	PLAINVILLE_KS	KS
5632	PLEASANTON	PLEASANTON	PLEASANTON_KS	KS
5633	POMONA	POMONA	POMONA_KS	KS
5634	POTWIN	POTWIN	POTWIN_KS	KS
5635	POWHATTAN	POWHATTAN	POWHATTAN_KS	KS
5636	PRAIRIE VIEW	PRAIRIE VW	PRAIRIE VW_KS	KS
5637	PRATT	PRATT	PRATT_KS	KS
5638	PRESCOTT	PRESCOTT	PRESCOTT_KS	KS
5639	PRESTON	PRESTON	PRESTON_KS	KS
5640	PRETTY PRAIRIE	PRETTYPRRI	PRETTYPRRI_KS	KS
5641	PRINCETON	PRINCETON	PRINCETON_KS	KS
5642	PROTECTION	PROTECTION	PROTECTION_KS	KS
5643	QUENEMO	QUENEMO	QUENEMO_KS	KS
5644	QUINCY	QUINCY	QUINCY_KS	KS
5645	QUINTER	QUINTER	QUINTER_KS	KS
5646	RAMONA	RAMONA	RAMONA_KS	KS
5647	RANDALL	RANDALL	RANDALL_KS	KS
5648	RANSOM	RANSOM	RANSOM_KS	KS
5649	RANTOUL	RANTOUL	RANTOUL_KS	KS
5650	READING	READING	READING_KS	KS
5651	REECE	REECE	REECE_KS	KS
5652	REPUBLIC	REPUBLIC	REPUBLIC_KS	KS
5653	REXFORD	REXFORD	REXFORD_KS	KS
5654	RICHFIELD	RICHFIELD	RICHFIELD_KS	KS

5655	RICHMOND	RICHMOND	RICHMOND_KS	KS
5656	RILEY	RILEY	RILEY_KS	KS
5657	RIVERDALE	RIVERDALE	RIVERDALE_KS	KS
5658	RIVERTON	RIVERTON	RIVERTON_KS	KS
5659	ROBINSON	ROBINSON	ROBINSON_KS	KS
5660	ROCK	ROCK	ROCK_KS	KS
5661	ROLLA	ROLLA	ROLLA_KS	KS
5662	ROSALIA	ROSALIA	ROSALIA_KS	KS
5663	ROSSVILLE	ROSSVILLE	ROSSVILLE_KS	KS
5664	ROXBURY	ROXBURY	ROXBURY_KS	KS
5665	ROZEL	ROZEL	ROZEL_KS	KS
5666	RUSH CENTER	RUSHCENTER	RUSHCENTER_KS	KS
5667	RUSSELL	RUSSELL	RUSSELL_KS	KS
5668	RUSSELL SPRINGS	RUSSELLSPG	RUSSELLSPG_KS	KS
5669	RYUS	RYUS	RYUS_KS	KS
5670	SABETHA	SABETHA	SABETHA_KS	KS
5671	SAFFORDVILLE	SAFFORDVL	SAFFORDVL_KS	KS
5672	SALEMSBURG	SALEMSBURG	SALEMSBURG_KS	KS
5673	SALINA	SALINA	SALINA_KS	KS
5674	SATANTA	SATANTA	SATANTA_KS	KS
5675	SAVONBURG	SAVONBURG	SAVONBURG_KS	KS
5676	SAWYER	SAWYER	SAWYER_KS	KS
5677	SCAMMON	SCAMMON	SCAMMON_KS	KS
5678	SCANDIA	SCANDIA	SCANDIA_KS	KS
5679	SCOTT CITY	SCOTT CITY	SCOTT CITY_KS	KS
5680	SCRANTON	SCRANTON	SCRANTON_KS	KS
5681	SEDAN	SEDAN	SEDAN_KS	KS
5682	SELDEN	SELDEN	SELDEN_KS	KS
5683	SENECA	SENECA	SENECA_KS	KS
5684	SEVERY	SEVERY	SEVERY_KS	KS
5685	SHARON	SHARON	SHARON_KS	KS
5686	SHARON SPRINGS	SHARON SPG	SHARON SPG_KS	KS
5687	SILVER LAKE	SILVERLAKE	SILVERLAKE_KS	KS
5688	SIMPSON	SIMPSON	SIMPSON_KS	KS
5689	SMITH CENTER	SMITH CTR	SMITH CTR_KS	KS
5690	SOUTH CHESTER	SO CHESTER	SO CHESTER_KS	KS
5691	SOUTH DANBURY	SO DANBURY	SO DANBURY_KS	KS
5692	SOUTH DU BOIS	SO DU BOIS	SO DU BOIS_KS	KS
5693	SOUTH HAIGLER	SO HAIGLER	SO HAIGLER_KS	KS
5694	SOUTH LIBERTY	SO LIBERTY	SO LIBERTY_KS	KS
5695	SOUTH NAPONEE	SO NAPONEE	SO NAPONEE_KS	KS
5696	SOUTH BARNESTON	SOBARNESTN	SOBARNESTN_KS	KS
5697	SOUTH BENKELMAN	SOBENKELMN	SOBENKELMN_KS	KS
5698	SOUTH BLOOMINGTON	SOBLOOMITN	SOBLOOMITN_KS	KS
5699	SOUTH FRANKLIN	SOFRANKLIN	SOFRANKLIN_KS	KS
5700	SOLDIER	SOLDIER	SOLDIER_KS	KS
5701	SOLOMON	SOLOMON	SOLOMON_KS	KS
5702	SOUTH PAWNEE CITY	SOPAWNEECY	SOPAWNEECY_KS	KS
5703	SOUTH RED CLOUD	SOREDCLLOUD	SOREDCLLOUD_KS	KS

5704	SOUTH SUPERIOR	SOSUPERIOR	SOSUPERIOR_KS	KS
5705	SOUTH ALMA	SOUTH ALMA	SOUTH ALMA_KS	KS
5706	SOUTH BYRON	SOUTHBYRON	SOUTHBYRON_KS	KS
5707	SOUTH HARDY	SOUTHHARDY	SOUTHHARDY_KS	KS
5708	SOUTH HAVEN	SOUTHHAVEN	SOUTHHAVEN_KS	KS
5709	SOUTH ODELL	SOUTHODELL	SOUTHODELL_KS	KS
5710	SOUTH WILSONVILLE	SOWILSONVL	SOWILSONVL_KS	KS
5711	SPEARVILLE	SPEARVILLE	SPEARVILLE_KS	KS
5712	SPRING HILL	SPRINGHILL	SPRINGHILL_KS	KS
5713	SOUTH REPUBLICAN CITY	SRPUBLCNCY	SRPUBLCNCY_KS	KS
5714	SAINT FRANCIS	ST FRANCIS	ST FRANCIS_KS	KS
5715	SAINT GEORGE	ST GEORGE	ST GEORGE_KS	KS
5716	SAINT JOHN	ST JOHN	ST JOHN_KS	KS
5717	SAINT MARYS	ST MARYS	ST MARYS_KS	KS
5718	SAINT PAUL	ST PAUL	ST PAUL_KS	KS
5719	STAFFORD	STAFFORD	STAFFORD_KS	KS
5720	STERLING	STERLING	STERLING_KS	KS
5721	STOCKTON	STOCKTON	STOCKTON_KS	KS
5722	SUBLETTE	SUBLETTE	SUBLETTE_KS	KS
5723	SUMMERFIELD	SUMMERFLD	SUMMERFLD_KS	KS
5724	SUN CITY	SUN CITY	SUN CITY_KS	KS
5725	SYLVAN GROVE	SYLVAN GRV	SYLVAN GRV_KS	KS
5726	SYLVIA	SYLVIA	SYLVIA_KS	KS
5727	SYRACUSE	SYRACUSE	SYRACUSE_KS	KS
5728	TESCOTT	TESCOTT	TESCOTT_KS	KS
5729	THAYER	THAYER	THAYER_KS	KS
5730	TIMKEN	TIMKEN	TIMKEN_KS	KS
5731	TIPTON	TIPTON	TIPTON_KS	KS
5732	TONGANOXIE	TONGANOXIE	TONGANOXIE_KS	KS
5733	TOPEKA	TOPEKA	TOPEKA_KS	KS
5734	TORONTO	TORONTO	TORONTO_KS	KS
5735	TOWANDA	TOWANDA	TOWANDA_KS	KS
5736	TREECE	TREECE	TREECE_KS	KS
5737	TRIBUNE	TRIBUNE	TRIBUNE_KS	KS
5738	TROY	TROY	TROY_KS	KS
5739	TURON	TURON	TURON_KS	KS
5740	TYRO	TYRO	TYRO_KS	KS
5741	UDALL	UDALL	UDALL_KS	KS
5742	ULYSSES	ULYSSES	ULYSSES_KS	KS
5743	UNIONTOWN	UNIONTOWN	UNIONTOWN_KS	KS
5744	UTICA	UTICA	UTICA_KS	KS
5745	VALLEY FALLS	VALLEY FLS	VALLEY FLS_KS	KS
5746	VERMILLION	VERMILLION	VERMILLION_KS	KS
5747	VICTORIA	VICTORIA	VICTORIA_KS	KS
5748	WEST MINERAL	W MINERAL	W MINERAL_KS	KS
5749	WAKEENEY	WAKEENEY	WAKEENEY_KS	KS
5750	WAKEFIELD	WAKEFIELD	WAKEFIELD_KS	KS
5751	WALDO	WALDO	WALDO_KS	KS
5752	WALDRON	WALDRON	WALDRON_KS	KS

5753	WALLACE	WALLACE	WALLACE_KS	KS
5754	WALNUT	WALNUT	WALNUT_KS	KS
5755	WALTON	WALTON	WALTON_KS	KS
5756	WAMEGO	WAMEGO	WAMEGO_KS	KS
5757	WASHINGTON	WASHINGTON	WASHINGTON_KS	KS
5758	WATHENA	WATHENA	WATHENA_KS	KS
5759	WAVERLY	WAVERLY	WAVERLY_KS	KS
5760	WEST CLEVELAND	WCLEVELAND	WCLEVELAND_KS	KS
5761	WEBBER	WEBBER	WEBBER_KS	KS
5762	WEIR CITY	WEIR CITY	WEIR CITY_KS	KS
5763	WELLINGTON	WELLINGTON	WELLINGTON_KS	KS
5764	WELLSVILLE	WELLSVILLE	WELLSVILLE_KS	KS
5765	WESKAN	WESKAN	WESKAN_KS	KS
5766	WEST HUME	WEST HUME	WEST HUME_KS	KS
5767	WEST DREXEL	WESTDREXEL	WESTDREXEL_KS	KS
5768	WESTMORELAND	WESTMORELD	WESTMORELD_KS	KS
5769	WESTPHALIA	WESTPHALIA	WESTPHALIA_KS	KS
5770	WETMORE	WETMORE	WETMORE_KS	KS
5771	WHEATON	WHEATON	WHEATON_KS	KS
5772	WHITE CITY	WHITE CITY	WHITE CITY_KS	KS
5773	WHITE CLOUD	WHITECLOUD	WHITECLOUD_KS	KS
5774	WHITE WATER	WHITEWATER	WHITEWATER_KS	KS
5775	WHITING	WHITING	WHITING_KS	KS
5776	WICHITA	WICHITA	WICHITA_KS	KS
5777	WILLIAMSBURG	WILLIAMSBG	WILLIAMSBG_KS	KS
5778	WILLIS	WILLIS	WILLIS_KS	KS
5779	WILMORE	WILMORE	WILMORE_KS	KS
5780	WILSEY	WILSEY	WILSEY_KS	KS
5781	WILSON	WILSON	WILSON_KS	KS
5782	WINCHESTER	WINCHESTER	WINCHESTER_KS	KS
5783	WINDOM	WINDOM	WINDOM_KS	KS
5784	WINFIELD	WINFIELD	WINFIELD_KS	KS
5785	WINONA	WINONA	WINONA_KS	KS
5786	WOODBINE	WOODBINE	WOODBINE_KS	KS
5787	WOODRUFF	WOODRUFF	WOODRUFF_KS	KS
5788	WOODSTON	WOODSTON	WOODSTON_KS	KS
5789	YATES CENTER	YATES CTR	YATES CTR_KS	KS
5790	ZENDA	ZENDA	ZENDA_KS	KS
5791	ZURICH	ZURICH	ZURICH_KS	KS

CERTIFICATE OF SERVICE

23-DWLZ-676-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 07/31/2025.

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