

May 22, 2025

Ms. Celeste Chaney-Tucker  
Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027  
[Celeste.Chaney-Tucker@ks.gov](mailto:Celeste.Chaney-Tucker@ks.gov)

**RE: Docket No. 24-GCPT-115-KSF**

***In the Matter of the Audit of GC Pivotal, LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022-February 2023***

Dear Ms. Chaney-Tucker:

On July 2, 2024, the Kansas Corporation Commission (KCC or Commission) issued an Order Adopting Vantage Point Solutions' (VPS) Audit Report and directed GC Pivotal, LLC (GC Pivotal or Company) to:

- (1) File audit True-ups for Fiscal Years (FYs) 25, 26, and 27, and revised CRWs for March and April 2024, to correctly report its actual revenues for the periods in which they were earned, to excluded Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges revenues from its reporting, and to include its POTS service revenues, VoIP Revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees;
- (2) Update its billing system to include KUSF surcharge collection of POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees, and exclude KUSF surcharge collection from Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges;
- (3) Update its reporting procedures to include reporting of POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees, and exclude reporting of Preferred Interexchange Carrier Charges, (PICC) and End User Common Line Charges;
- (4) Remit \$6,812.65 to the KUSF; and

- (5) File an affidavit, signed by an officer of the Company, attesting that the Company:
- (a) Corrected its KUSF reporting procedures to include POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees in reporting revenues;
  - (b) Corrected its KUSF reporting procedures to exclude Preferred Interexchange Carrier Charges (PICC) AND End User Common Line Charges from its reporting revenues;
  - (c) Corrected its billing system to include KUSF surcharge collection from POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-Listed Fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees;
  - (d) Corrected its billing system to exclude KUSF surcharge collection from Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges; and
  - (e) Remitted \$6,812.65 to the KUSF.

These actions were to be taken within 60 days of the issuance of the Order, or September 3, 2024.

On August 30, 2024, the Company filed a Motion for Extension of Time in the Docket, petitioning the Commission to grant an extension for its compliance obligations to November 2, 2024.

On September 10, 2024, the Company remitted \$6,812.65 to the KUSF.

On September 19, 2024, the Commission issued an Order Granting the Company's Motion for Extension of Time.

On November 19, 2024, the Company filed a second Motion for Extension of Time in the Docket, petitioning the Commission to grant an extension for its compliance obligations to January 16, 2025.

On November 26, 2024, the Commission issued an Order Granting the Company's Motion for Extension of Time.

On February 24, 2025, the Company filed a third Motion for Extension of Time in the Docket petitioning the Commission to grant an extension for its compliance obligations to May 16, 2025.

On February 27, 2025, the Commission issued an Order Granting the Company's Motion for Extension of Time.


On May 16, 2025, GC Pivotal submitted audit True-ups for FYs 25, 26, 27 and 28 to correctly report its actual revenues for the periods in which they were earned, exclude Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges revenues from its reporting, and including its POTS service revenues, VoIP Revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges and Directory Assistance Fees.

Also, on May 16, 2025, GC Pivotal submitted an affidavit, signed by an officer of the Company, attesting that the Company:

- (a) Corrected its KUSF reporting procedures to include POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-listed fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees in reporting revenues;
- (b) Corrected its KUSF reporting procedures to exclude Preferred Interexchange Carrier Charges (PICC) AND End User Common Line Charges from its reporting revenues;
- (c) Corrected its billing system to include KUSF surcharge collection from POTS revenues, VoIP service revenues, Remote Call Forwarding Fees, Non-published listing fees, Non-Listed Fees, Account Maintenance Fees, Additional Listing Charges, and Directory Assistance Fees;
- (d) Corrected its billing system to exclude KUSF surcharge collection from Preferred Interexchange Carrier Charges (PICC) and End User Common Line Charges; and
- (e) Remitted \$6,812.65 to the KUSF.

VPS recommends that the Commission determine GC Pivotal is in compliance with the Commission's Order and that Docket No. 24-GCPT-115-KSF be closed.

Sincerely,



Shomari Jackson

cc: Steve Garrett - [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov)

## CERTIFICATE OF SERVICE

I hereby certify that on this 20<sup>th</sup> day of May, 2025, the above Kansas Universal Service Fund Audit Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

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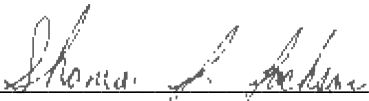
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