

COLLEEN R. JAMISON  
JAMISON LAW, LLC

June 24, 2025

Celeste Chaney-Tucker  
Executive Director, Kansas Corporation Commission  
1500 SW Arrowhead Rd.  
Topeka, KS 66604

RE: S&T Communications, LLC  
Docket No. 25-GIMT-332-GIT  
254(e) certifications

Dear Ms. Chaney-Tucker:

On behalf of S&T Communications, LLC, attached please find for filing in Docket No. 25-GIMT-332-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 30, 2025 (Attachments 1, 3a, 4, and 5).

In this filing, the entirety of Attachments 3a and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Cordially yours,

*Colleen R. Jamison*

Colleen R. Jamison  
JAMISON LAW, LLC

Encl.

cc: Christina Hickert  
Hannah Hart  
Tina Cohan

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

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

In the Matter of Certification of Compliance )  
with Section 254(e) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 25-GIMT-332-GIT  
Certification of Appropriate Use of Kansas )  
Universal Service Fund Support. )

**SECTION 254(e) CERTIFICATION**  
**FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT**  
**FCC Docket Reference: CC Docket No. 96-45**  
**and KANSAS UNIVERSAL SERVICE FUND SUPPORT**

(Please type or print legibly)

**(Circle all Federal and Kansas Support Received)**

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

2. S&T Communications (Company/Cooperative) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No10-S&CT-564-ETC by order dated October 13, 2010 and KUSF support purposes in Docket No. 10-S&CT-564-ETC by order dated October 13,2010.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, Enhanced ACAM, RBE, RDOF, and/or KUSF received by S&T

**Docket No. 25-GIMT-332-GIT**  
**Attachment 1**

Communications (Company/Cooperative) was used in the proceeding calendar year **2024** and will be used in the new calendar year **2026 only** for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal Telecommunications Act, and/or Kansas statutes and KCC requirements.

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

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

*Zack Odell*

Zack Odell (Jun 17, 2025 14:40 CDT)

Signature

Zack Odell

Printed/Typed Name

Executed on 17/06/2025 date.

Email address: zack.odell@sttelcom.com

Company Name : S&T COMMUNICATIONS LLC

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R. § 54.314 and KCC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov) and [hemant.bhagat@ks.gov](mailto:hemant.bhagat@ks.gov).

Data Year	2024
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FUSF WORKING LOOPS/LINEAverage No. Customers

**NEW INVESTMENTS:**

1. SWITCHING
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)

**SUBTOTAL NEW INVESTMENTS**

**EXPENSES:**

3. SWITCH MAINTENANCE
4. OUTSIDE PLANT MAINTENANCE
5. NETWORK SUPPORT
6. ADMINISTRATIVE EXPENSE

**SUBTOTAL EXPENSES**

**A. TOTAL CASH EXPENDITURES ASSD WITH USF**

**B. CERTIFIED FUSF RECEIPTS FOR CETCS**

- B1. Frozen High Cost Support
- B2. Mobility Fund Support
- B3. Rural Broadband Experiments Fund
- B4. CAF II Support
- B5. Rural Digital Opportunity Fund

**B5. Total Certified Federal USF Receipts**

**C. DO EXPENDITURES EXCEED FUSF RECEIPTS?**

(negative number means FUSF exceeds Expenditures)

Yes

**Notes:**

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
  - a. Based on number of switched MOUs from USF supported cell sites.
  - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
  - c. Based on percent of USF served areas to all areas.

Contact Name: Zack Odell

Title: CEO

Phone No.: 785-694-2256

E-Mail: zackodell@sttelcom.com

S T Telephone Cooperative Assoc., Inc. ATTACHMENT 4 25GIMT332GIT

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

Data Year: **2024**

NOTES:

Contact: <u>Stacey Brigham</u>	Phone No.: <u>719-2664334</u>
Title: <u>Regulatory Director</u>	E-Mail: <u>sbrigham@tcatel.com</u>

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

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?

**(No) . IF YES, PLEASE COMPLETE THE FOLLOWING:**

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected
N/A					

(If necessary, please provide additional pages.)

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

  0    
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

  0.000777604  \_\_\_\_\_

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

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is CEO of the S&T Communications, LLC. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding S&T Communications, LLC to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications, LLC is in compliance with the Commission's quality of service standards as adopted in Docket No. 191,206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 17/06/2025 (date).

Zack Odell

Zack Odell (Jun 17, 2025 14:40 CDT)

Signature

Zack Odell

Printed/Typed Name

**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

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

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

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print / Typed Name

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

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is CEO of the S&T Communications, LLC. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding S&T Communications, LLC to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications, LLC is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 17/06/2025 (date).

Zack Odell

Zack Odell (Jun 17, 2025 14:40 CDT)

Signature

Zack Odell

Printed / Typed Name

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

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
S&T Website	Internet	Worldwide	24/7/365
KGCR - FM	Radio	Northwest Kansas	Varies
KRDQ	Radio	Northwest Kansas	Varies
KWGB - FM	Radio	Northwest Kansas	Varies
KXXX / KQLS	Radio	Northwest Kansas	Varies
KLOE - AM	Radio	Northwest Kansas	Varies
S&T Media	CATV	Service Areas	Varies
Various	Newspapers	Northwest Kansas	Varies
Facebook; Instagram; LinkedIn	Social	Worldwide	Varies
KSKL Scott City	Radio	Northwest/Southwest Kansas	Varies
S&T Annual Phone Directory	Print	Brewster, Colby, Dighton, Goodland, Grinnell, Kanorado, Levant, Menlo,	November 2024



	Russell Springs, Winona, Atwood, Bird City, Gove, Grainfield, Hoxie, Leoti, McDonald, Oakley, Sequin, Sharon Springs, Tribune, Wallace, Weskan Customers & all Business Customers. For Residential we targeted age 45+.	
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(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

Residential PKG LD Unlimited; Business PKG LD 1000; Business PKG LD 1500; Business PKG LD 3000; Business PKG LD 5000; Business PKG LD 7500

#### COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is CEO of the S&T Communications, LLC. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding S&T Communications, LLC to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications, LLC offers a local usage plan comparable to that of the incumbent.

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

\_\_\_\_\_  
Signature

Zack Odell

Printed/Typed Name