

April 1, 2022

Ms. Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

RE: Docket No. 21-SSLZ-056-KSF
In the Matter of the Audit of Sprint Spectrum, LP. by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Fiscal Year 23, March 2019-February 2020

Dear Ms. Retz:

On June 17, 2021, Kansas Corporation Commission (KCC or Commission) issued an Order adopting Vantage Point Solution's (formerly GVNW) (VPS) Audit Report and directed Sprint Spectrum, LP (Sprint) to: (1) file audit True-up Reports for March 2018 through February 2021 (FYs 22 – 24) to correct its reporting and billing processes for non-assessable revenues; (2) refund to affected customers in a one-time billing credit \$25,103.93, determined on pro-rata basis to account for the collection of Visual Voicemail Activation Fees and Early Equipment Upgrade Option Fees; (3) file an affidavit of a corporate officer attesting to the amount of any refund and its completion; and (4) provide documentation to support the completion of the refund process. These actions were to be taken within 60-days of the issuance of the Order, or August 16, 2021.

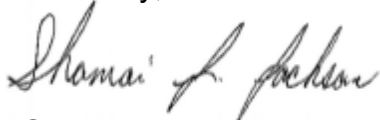
On September 23, 2021, the Company filed a Motion for Extension of time. On October 7, 2021, the KCC issued an Order granting the Company's request for extended time to comply.

On November 15, 2021, VPS reached out to the Company to inquire on the status of the compliance, and to determine if the Company had completed all the components of its compliance. In response to VPS' inquiry, the Company filed a *Response to Inquiry Concerning Compliance* on November 30, 2021, which stated that the Company's compliance was still in progress. On December 17, 2021, the Company filed a *Response to the Staff Inquiry Concerning Timing for Completion of Tasks Necessary to Comply with the Commission's Order Adopting the Audit Report and Recommendations*.

On January 19, 2022, Sprint filed another *Report on Compliance with the Commission's Order Adopting the Audit Report and Recommendations*,¹ which confirmed that the Company had issued refunds to affected customers through a one-time billing credit on a pro-rata basis. It should be noted that the Company issued checks to discontinued customers. Additionally, credits of less than \$1.00 were not issued, as it would have amounted to approximately a penny per current customer. The report also reflected that the Company has modified its billing system to omit the reporting and collection of the KUSF surcharge of its Visual Voicemail Activation Fees, and the collection of the KUSF surcharge on its Early Equipment Upgrade Option Fees. On January 31, 2022, the Company filed audit True-up reports for March 2018 through February 2021 (FYs 22 – 24) to correctly report its revenues. On February 28, 2022, the Company submitted an affidavit, signed by an officer of the Company, attesting to the amount and the completion date of the customer credits. On March 25, 2022, the Company provided VPS with the documentation confirming the customer refunds have been completed.

VPS recommends that the Commission determine Sprint Spectrum is in compliance with the Commission's Order and the Docket No. 21-SSLZ-056-KSF be closed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Shomari J. Jackson".

Shomari J. Jackson
Consultant

¹ Report on Compliance with the Commission's Order Adopting the Audit Report and Recommendation, Docket No. 21-SSLZ-056-KSF, January 20, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April 2022, the above Kansas Universal Service Fund Compliance 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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TOPEKA, KS 66604

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Shomari Jackson

From: [Dawn Cartellone](#)
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Cc: [Haas, Bill](#); mark.johnson@dentons.com; [Judi Ushio](#); [Dennis Smith](#); [Nicole Stephens](#); [Shomari Jackson](#)
Subject: Kansas USF FY23-Sprint Spectrum
Date: Friday, April 1, 2022 2:03:16 PM
Attachments: [image001.png](#)
[Sprint Spectrum FY23 Compliance Report 2022-04-01 EFILED.pdf](#)

The attached Compliance Report has been filed with the KCC.

Dawn Cartellone

Analyst

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From: do-not-reply@kcc.ks.gov
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Cc: d.shupe@kcc.ks.gov; l.retz@kcc.ks.gov; s.conn@kcc.ks.gov; d.mayfield@kcc.ks.gov
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The Kansas Corporation Commission (KCC) E-Filing system has received a filing.

Transaction Id: 20220401_3k0wpi

Date submitted: 04/01/2022

File Name: Sprint Spectrum FY24 Compliance Report 2022-04-01 EFILED.pdf

Security: PUBLIC

Industry: Telecom

Filing Type: Compliance

Docket Number: 21-SSLZ-056-KSF

Caption: Sprint Spectrum, LP FY23 Compliance Report

You will receive a Confirmation of Receipt when the Docket Room processes your filing.

/s/ Kansas Corporation Commission

KCC Help Desk: 785-271-3300