

Duane D. Dickson Sr Manager – Regulatory Strategy & Financial Analysis duane.dickson@tdstelecom.com 608-664-4410

January 10, 2025

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

RE: Docket No. 24-GIMT-229-GIT

KS USF Traffic Study Factors – Q1 2025

Dear Ms. Retz:

Enclosed for filing please find a public version of TDS Metrocom, LLC's Request for Approval of Use of Traffic Studies for Kansas Universal Service Fund Reporting and associated affidavit of Andrew S. Petersen.

Please let me know if you have any questions regarding this filing.

Sincerely,

Duane D Dickson

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Duane D. Dickson

Sr Manager – Regulatory Strategy & Financial Analysis

Enclosures

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of an Investigation to Determine)	
the Annual Assessment Rate for the Twenty-)	Docket No. 24-GIMT-229-GIT
Eighth Year of the Kansas Universal Service)	
Fund, Effective March 1, 2024)	

REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDIES FOR KANSAS UNIVERSAL SERVICE FUND REPORTING

COMES NOW TDS Metrocom, LLC ("TDS Metrocom") and requests approval by the State Corporation commission of the State of Kansas ("Commission") for TDS Metrocom to use, effective October 1, 2023, the inverse percentage derived by TDS Metrocom's traffic studies for its federal Universal Service Fund ("FUSF") filings to determine the intrastate revenues for its Kansas Universal Service Fund ("KUSF") assessment. In support, TDS Metrocom provides the following:

1. In its January 24, 2012 and February 1, 2012 Orders in Docket No. 12-GIMT-168-GIT, the Commission established that wireless carriers and interconnected VoIP providers may utilize a traffic study methodology to determine revenue allocations between jurisdictions.

Further, if the provider utilizes a traffic study methodology, it must provide the jurisdictional percentages ("traffic factors") to the Commission at least annually in the annual KUSF docket and identify the specific timeframes for which the traffic factors apply, as well as provide an affidavit from an officer of the company attesting that it uses the inverse of the intrastate KUSF revenue percentages for interstate FUSF remittance purposes.

2. On August 1, 2022, in Docket No. 22-GIMT-142-GIT, TDS Metrocom filed its request to use a traffic study methodology for KUSF reporting purposes and establish the quarterly intrastate percentage to be applied for KUSF reporting purposes, effective July 1, 2022. On August 9, 2022, the Commission approved TDS Metrocom's request and intrastate traffic

factor.

3. In accordance with the Commission's above-referenced orders in Docket No. 12-GIMT-168-GIT and Docket No. 22-GIMT-142-GIT, TDS Metrocom hereby submits its updated intrastate percentage for KUSF reporting purposes, effective January I, 2025, equal to the inverse of its updated quarterly interstate traffic study factor developed and utilized for its FUSF reporting. See Exhibit A attached hereto. The traffic study was performed via actual traffic data of TDS Metrocom.

WHEREFORE, TDS Metrocom respectfully requests the Commission approve its company-specific quarterly traffic study and its use of the inverse of the federal percentages derived from that study for KUSF reporting purposes.

Respectfully submitted,

duane.dickson@tdstelecom.com

Digitally signed by Duane D Dickson
Dickson
Date: 2025.01.10 14:27:48 -08'00'

Duane D. Dickson Sr Manager – Regulatory Strategy & Financial Analysis TDS Telecom Service, LLC S25 Junction Rd Madison, WI 53717 Ph: 608-664-4410

EXHIBIT A - PUBLIC

TDS Metrocom, LLC -- Interstate and International Revenue Percentage Calculation

Line	Description	Jurisdiction	Traffic Source	SumOfMinutes (Oct 2023-Sep 2024)
1	Total Subscriber Interstate/InterLATA Minutes	Inter	LD SABRE DB	Redacted
2	Total Subscriber Intrastate/InterLATA Minutes	Intra	LD SABRE DB	Redacted
3	Total Subscriber Intrastate/IntraLATA Minutes	Intra	LD SABRE DB	Redacted
4	Total Subscriber Interstate/IntraLATA Minutes	Inter	LD SABRE DB	Redacted
5	Total Subscriber International Minutes	Inter	LD SABRE DB	Redacted
6	Total Subscriber Intrastate/InterLATA DA Minutes	Intra	LD SABRE DB	Redacted
7	Total Subscriber Intrastate/IntraLATA DA Minutes	Intra	LD SABRE DB	Redacted
8	Total Subscriber Long Distance Minutes			Redacted
	Factor Application Effective From: Factor Application Effective To: Total Interstate and International (Inter) Total Intrastate (Intra)			Jan 2025 Mar 2025 Redacted Redacted

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STATE OF IOWA)	
COUNTY OF FLOYD)	

BEFORE ME, the undersigned person, Andrew S. Petersen, appeared who deposed and said:

- 1. I, Andrew S. Petersen, Sr Vice President-Corporate Affairs for TDS Telecom Service, LLC, am an officer of TDS Metrocom, LLC and authorized to give this Affidavit on its behalf. I have knowledge of the methods and procedures used by TDS Metrocom to determine assessable revenues for the Kansas Universal Service Fund ("KUSF") and the Federal Universal Service Fund ("FUSF").
- I hereby confirm and verify that the traffic study methodology and inverse of the intrastate traffic factors presented and submitted to the Kansas Corporation Commission within this filing are those utilized by TDS Metrocom for its FUSF reporting purposes.

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Andrew S. Petersen

Sr Vice President-Corporate Affairs

Sworn before me this 10th day of January, 2025, by Andrew S. Petersen, as Sr Vice President-Corporate Affairs, who is personally known to me or produced identification and who did take an oath.

Printed Name of Notary:

My Commission Expires:

DocuSigned by:

Jodette L. Friedrich

JODETTE L. FRIEDRICH

NOTARIAL SEAL

IOWA

Commission Number 841316

My Commission Expires:

NOTARY PUBLIC