

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

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

In the Matter of An Investigation to Determine )  
the Affordable Local Service Rates for Rate- ) Docket No. 25-GIMT-141-GIT  
of-Return Regulated Carriers and the Annual )  
Assessment Rate for the Twenty-Ninth Year of )  
the Kansas Universal Service Fund, Effective )  
March 1, 2025. )

**ORDER OPENING DOCKET; PROTECTIVE ORDER APPLICABLE TO CURB;  
REQUIRING ENTRIES OF APPEARANCE TO ACTIVELY PARTICIPATE AND  
ESTABLISHING PROCEDURAL SCHEDULE**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

**I. Background on KUSF Contributions and Affordable Rates**

1. K.S.A. 66-2008(a) provides:

“The Commission shall require every telecommunications carrier, telecommunications public utility and wireless telecommunications service provider that provides intrastate telecommunications services and, to the extent not prohibited by federal law, every provider of interconnected VoIP service, as defined by 47 C.F.R. 9.3, to contribute to the KUSF based upon the provider's intrastate telecommunications services net retail revenues on an equitable and nondiscriminatory basis. The commission shall not require any provider to contribute to the KUSF under a different contribution methodology than such provider uses for purposes of the federal universal service fund, including for bundled offerings. Any telecommunications carrier, telecommunications public utility, wireless telecommunications service provider or provider of interconnected VoIP service which contributes to the KUSF may collect from customers an amount equal to such carrier's, utility's or provider's contribution, but such carrier, provider or utility may collect a lesser amount from its customer.”

2. In Docket No. 94-GIMT-478-GIT, the Commission declared that an assessment on intrastate retail revenues determined on an annual basis would result in equitable and non-discriminatory contributions to the KUSF.<sup>1</sup> This Docket will be utilized in part to determine the assessment rate for the Twenty-Ninth Year of the KUSF (March 2025 – February 2026).

3. This Docket will also be utilized to determine the residential and single line business affordable rates for local exchange service provided by rural telephone companies subject to traditional rate-of-return regulation pursuant to K.S.A. 66-2005(e). K.S.A. 2005(e) requires the Commission to determine the affordable rates every two years after March 1, 2007.<sup>2</sup> Previously referred to as “Target Rates,” the Affordable Rates are considered to be the reasonable price rural customers should pay toward their cost of service – recognizing that rates in rural areas are subsidized by non-rural customers through the KUSF.<sup>3</sup> Rural telephone companies are authorized under K.S.A. 66-2005(e)(1)(C) to raise their local monthly service rates by \$2.00 per year to reach the Affordable Rates. To protect non-rural customers from having to subsidize rural customers with artificially low rates, a rural telephone company that elects not to raise its rates will have its KUSF support reduced by the revenue it would have received had it raised its rates.<sup>4</sup>

4. The affordable residential rate is the weighted arithmetic mean of the residential local service rates, as of October 1, of the preceding calendar year, for rural local exchange carriers (RLECs) and rate groups 1 through 3 for all other incumbent LECs, except electing carriers, weighted by the number of residential access lines to which each rate applies, rounded to the

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<sup>1</sup> See Order, Docket No. 94-GIMT-478-GIT, p. 39-40 (Dec. 27, 1996).

<sup>2</sup> See K.S.A. 66-2005(e)(1). The Affordable Rate is calculated by finding the arithmetic mean of residential local service rates charged in Kansas in all exchanges served by rural telephone companies and all exchanges in rate groups 1 through 3 as of February 20, 2002, of all other local exchange carriers, but not including elected carriers, weighted by the number of residential access lines to which each such rate applies, and thereafter rounded to the nearest quarter-dollar.

<sup>3</sup> See Order Adopting Stipulation and Agreement, Exhibit A ¶ 11, Docket No. 02-GIMT-068-KSF (March 11, 2002).

<sup>4</sup> See K.S.A. 66-2005(d); K.S.A. 66-2008(d); Order Adopting Stipulation and Agreement, Exhibit A, ¶ 20, Docket No. 02-GIMT-068-GIT (Mar. 11, 2002).

nearest quarter-dollar.<sup>5</sup> The affordable single-line business rate is the existing rate or an amount \$3.00 higher than the affordable residential rate, whichever is greater.<sup>6</sup> Rural telephone companies that utilize K.S.A. 66-2007(b) to raise their rates shall have their Affordable Rates increased by an equivalent amount.<sup>7</sup>

5. K.S.A. 66-2005(e)(7) allows an RLEC to adopt a uniform rate for residential and single-line business local service, which rate shall be deemed an affordable rate under subsection (e) if the uniform rate generates an equal amount of revenue as that which would be generated by the separate residential and single-line affordable business rates.

6. K.S.A. 66-2005(e)'s Affordable Rate provisions do not apply to RLECs that do not receive KUSF support; however, such RLECs' residential rates are included in the affordable rate calculation.<sup>8</sup>

## **II. Staff's Report and Recommendation**

7. Commission Staff (Staff) submitted a Report and Recommendation (R&R) on September 4, 2024, attached hereto as Exhibit A and incorporated herein by reference. In order to determine the KUSF Year 29 assessment rate and the affordable residential and single-line business rates for the rate-of-return RLECs, Staff recommended that the RLECs and Brightspeed file Attachment A and documentation to support their access line data in the Docket and provide an electronic copy of Attachment A in Excel format no later than October 14, 2024. Staff recommended that Brightspeed be directed to file Attachment B and supporting documentation in the Docket and provide an electronic copy in Excel format to Staff no later than October 14, 2024.

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<sup>5</sup> See K.S.A. 66-2005(e)(1).

<sup>6</sup> See *Id.* at 66-2005(e)(2).

<sup>7</sup> See *Id.* at 66-2005(e)(5).

<sup>8</sup> See *Id.* at 66-2005(e)(8).

Brightspeed will also need to file its intrastate access rates, revenues, and its usage as of September 30, 2024, in the Docket no later than October 14, 2024.

8. In order for the Commission to address the KUSF Year 29 assessment rate and Affordable Rates at the same time, Staff calculated the preliminary Affordable Rates to be utilized by the RLECs when completing their Attachments. The residential and single-line business preliminary Affordable Rates are \$19.00 and \$22.00, respectively.

9. Staff recommended that all companies be reminded that they may be subject to penalties if the required data is not filed in the Docket and provided to Staff in accordance with the Commission’s Order.

10. Staff also recommended that parties be directed to notify Staff if they become aware of a computational error in their own data, Staff’s testimony, or Staff’s calculations as soon as they become aware of an error to allow Staff time to determine if the error impacts its calculations and file revised calculations and testimony, if needed.

**II. Procedural Schedule**

11. Staff proposed a procedural schedule to govern this Docket as follows:

<u>Date</u>	<u>Event</u>
October 14, 2024	Companies file data
December 13, 2024	Staff files Direct Testimony
December 27, 2024	Intervenors file Testimony
January 6, 2025	Staff files Reply Testimony, if needed
January 15, 2025 at 9 a.m. via Zoom	Evidentiary Hearing, if needed
By January 31, 2025	Order Adopting Year 29 Rates

**III. Commission’s Adoption of Staff’s Recommendations**

12. The Commission finds Staff’s recommendations to be reasonable and hereby adopts the same. Companies shall file their information in the Docket utilizing the forms provided by Staff referenced above, and available for download from the Commission’s website at:

<https://kcc.ks.gov/telecommunications/service-provider-forms>. Parties shall adhere to the Procedural Schedule adopted herein. Failure to submit data in a timely manner may subject a company to penalties pursuant to K.S.A. 66-138. Companies shall submit electronic versions of their Attachments filed in the Docket, in Microsoft Excel format, to Staff at [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov).

#### **IV. Procedural Matters Regarding Electronic Service and Entries of Appearance**

13. The Commission finds that all carriers contributing to, and all carriers receiving distributions from the KUSF, and the Citizens' Utility Ratepayer Board (CURB), should be parties to this docket.

14. The Commission anticipates the number of carriers or entities that will want to be actively involved in this proceeding will be fewer than all carriers or entities being served with this Order. Active parties are those carriers or entities desiring to be involved in litigating issues to be identified and explored in this general investigation. Only those entities that participate as active parties in this docket will be served with pleadings, testimony, briefs, and procedural orders as this proceeding progresses; only active parties will be given notice of and allowed to participate in hearings, roundtables, or other sessions that are scheduled in this proceeding. An entity that desires to participate as an active party in this proceeding shall file an Entry of Appearance within fifteen (15) days of the issuance of this Order. If a carrier or entity does not file an Entry of Appearance in this proceeding, but later desires to become an active party, that carrier or entity may do so by submitting a Late Filed Entry of Appearance and state whether it is willing to receive electronic service and, if so, provide an email address for service, as discussed above and below. Upon receipt of the Commission's Order on the assessment rate, an entity that chose not to actively participate in this docket will be allowed to petition for reconsideration, but the entity will not be

allowed to introduce new issues inasmuch as it was given notice of the adjudicative proceeding with service of this Order, but chose not to participate.

15. The Commission urges active parties to this proceeding to consent to receipt of pleadings, testimony, briefs, and orders by electronic service without a hard-copy follow-up as required by K.A.R. 82-1-216(a)(6). A party may note its consent on its Entry of Appearance. Testimony, briefs, and other pleadings must be served electronically by 3:00 p.m. on the date due, without requiring service among the parties of a follow-up hardcopy. However, the original and at least seven paper copies of testimony, briefs, and other pleadings must still be filed in the Commission's Docket Room by close of business on the date of the deadline, pursuant to K.A.R. 82-1-215(a). Any electronic service of Commission or Prehearing Officer's orders without follow-up hard copies will specifically state in the electronic message serving the order that the electronic message constitutes service of the attached order and that a hard copy will not follow. Parties should provide the Commission their current email address and must maintain accurate, current lists of electronic service email addresses based on information contained within the Commission's orders.

**V. Protective Order Applicable Only to CURB**

16. K.S.A. 66-1220a and K.A.R. 82-1-221a set forth requirements for the designation and treatment of information deemed confidential in Commission proceedings. The Commission finds it is appropriate to issue this Protective Order in order to establish procedures relating to confidential data and information.

17. K.S.A. 66-1220a limits disclosure of trade secrets or confidential commercial information of regulated utilities. Under K.S.A. 66-1220a(a)(4), the Commission must consider alternatives to disclosure that will serve the public interest and protect the regulated entity. This

Protective Order provides an interim procedure under K.S.A. 66-1220a(a)(4) to facilitate the prompt and orderly conduct of this case. This Protective Order will govern the treatment and handling of confidential information until further order of the Commission.

18. A party may designate, in writing and clearly marked, any information as confidential that it believes, in good faith, to be a trade secret or other confidential commercial information. The party designating the information as confidential must provide a written statement of the specific grounds for the designation at the time the designation is made.<sup>9</sup> The party claiming confidentiality has the burden of proving the confidential status of the information. Designating information as confidential does not establish that the information will remain confidential after review by the Commission.<sup>10</sup>

19. The provisions of this Protective Order apply to CURB, as other active party carriers will not have access to carrier specific confidential information, unless otherwise ordered, in which case the Protective Order shall apply to all information designated as confidential subject to review by any other designated active party. The provisions also apply to Staff, except that Staff is not required to sign nondisclosure certificates or view voluminous materials on site and is not required to return or destroy confidential information upon request at the conclusion of a proceeding. Outside experts and consultants used by Staff shall have access to information and voluminous materials on the same basis as Staff, except that outside Staff experts and consultants are required to comply with this Protective Order and to sign nondisclosure certificates as contained in Appendix A. CURB and outside experts and consultants used by Staff who do not sign a non-disclosure certificate will not be granted access to confidential information filed in this docket.

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<sup>9</sup> K.A.R. 82-1-221a(a)(5).

<sup>10</sup> *See* K.S.A. 66-1220a.

20. The following definitions shall apply:

**Information:** “Information” refers to all documents, data, including electronic data, studies and other materials furnished pursuant to requests for information or other modes of discovery, or any other information or documents that are otherwise a part of the Commission record.

**Confidential Information:** “Confidential information” refers to information which, if disclosed, would likely result in harm to a party’s economic or competitive interests or which would result in harm to the public interest, generally, and which is not otherwise available from public sources. “Confidential information” may include, but is not limited to: (1) material or documents that contain information relating directly to specific customers; (2) employee-sensitive information; (3) marketing analyses or other market-specific information relating to services offered in competition with others; (4) reports, work papers or other documentation related to work produced by internal or external auditors or consultants; (5) strategies employed, to be employed, or under consideration; (6) contract negotiations; and, (7) information concerning trade secrets, as well as private technical, financial, and business information.

21. A party designating information as confidential shall make the confidential information available to CURB, Staff, and/or outside experts and consultants used by Staff under the restrictions in this Protective Order, if such disclosure is not otherwise privileged or objectionable on other evidentiary grounds. The nondisclosure certificate shall contain the signatory’s name, permanent address, title or position, date signed, and an affirmation that the signer is acting on behalf of a party to this proceeding. The nondisclosure certificate shall be filed in the Docket. If a response to a discovery request requires the duplication of voluminous material, or the material is not easily copied because of its binding or size, the furnishing party may require that the voluminous material be viewed on its own premises. If duplication of voluminous material can be accomplished without undue burden on the party disclosing the information, the voluminous material may be copied at the expense of the requesting party. Voluminous material shall include documents or materials comprised of 500 pages or more.



22. A party may designate pre-filed testimony and exhibits as confidential pursuant to this Protective Order. The specific grounds for the confidential designation shall be stated in writing at the time the designation is made or the testimony filed. Any party obtaining confidential information may use or refer to such information in pre-filed or oral testimony provided that the confidentiality is maintained, unless otherwise ordered by the Commission.

23. If information to be disclosed in response to a data request contains confidential information designated by another party in this Docket, the furnishing party shall maintain the confidential status by marking the information as confidential and only provide response to parties that have signed nondisclosure certificates. If information that a party intends to use in this proceeding or that would be disclosed in response to a data request contains confidential information obtained from a source outside of this proceeding, the party intending to use or provide the confidential information must notify the original source which claimed confidential status to allow that entity to decide whether to claim confidentiality in this proceeding.

24. When pleadings, pre-filed testimony, or exhibits include confidential information, the parties are to follow these procedures<sup>11</sup>:

- a. File seven copies of the complete document, including all confidential information. The cover is to clearly state "CONFIDENTIAL VERSION." Confidential pages shall be stamped "CONFIDENTIAL," and the specific confidential information shall be identified by being underlined.
- b. File one copy with the confidential portions redacted, for use as a public document. The cover is to clearly state "PUBLIC VERSION."
- c. File one copy of the pages that contain confidential information in a separate envelope marked "CONFIDENTIAL." This filing will be maintained in the docket room file under seal. If there are multiple pages with confidential information and it is impracticable to separate the pages with the confidential information, the party may file instead one copy of the entire document that is stamped "CONFIDENTIAL."

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<sup>11</sup>This does not apply to parties who file using E-Filing EXPRESS. *See* 14-GIMX-280-MIS.

25. Confidential testimony may be offered or subject to cross-examination at hearings. Parties have the right to object to the admissibility of confidential information on standard evidentiary grounds such as relevance. Confidential information that is received into evidence will be kept under seal. Confidential information shall be discussed only after the hearing is closed to all persons except the Commission, its Staff, hearing examiners, court reporters, attorneys of record and individuals to whom the designated information is available under the terms of this Protective Order. Parties shall make every effort at hearings to ask and answer questions in such a way as to preserve the confidentiality of the information without the need to close the hearing. The transcript of live testimony or oral argument disclosing confidential information shall be kept under seal and copies provided only to persons entitled to access to confidential information. Neither the parties nor their attorneys shall disclose or provide copies of the contents of such transcripts to anyone other than those who may have access to the designated information under the terms of this Protective Order.

26. If a party disagrees with a claim that information is confidential or should not be disclosed, the parties shall first attempt to resolve the dispute on an informal basis. If the parties cannot resolve the dispute informally, the party contesting the confidential treatment may file a motion with the Commission. Commission Staff is also prepared to challenge a confidential designation when Staff believes that the information does not meet the definition of confidential information. When a dispute concerning the confidentiality is brought before the Commission, the Commission will review the matter to determine: (1) if the party claiming confidentiality has met its burden of establishing the confidential designation is proper, and (2) whether disclosure is warranted under K.S.A. 66-1220a. The contested information shall not be disclosed pending the Commission's ruling.

27. All persons who are afforded access to confidential information under the terms of this Protective Order shall neither use nor disclose such information for purposes of business or competition or any other purpose other than the purpose of preparation for and litigation of this proceeding. During the course of this proceeding, parties shall keep confidential information secure in accordance with the purposes and intent of this order. At the conclusion of this proceeding, including judicial review, a party claiming that information was confidential may require that other persons in possession of its confidential information return or destroy all such confidential information and all notes, tapes, documents, and any other medium containing, summarizing, or otherwise embodying such confidential information. If the party claiming confidentiality requests destruction, the person destroying the information shall certify its destruction. Counsel shall be entitled to retain memoranda or pleadings including or embodying confidential information to the extent reasonably necessary to preserve a file on this proceeding.

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. RLECs shall file Attachment A and supporting access line documentation in this Docket and provide an electronic copy of Attachment A, in Excel format to [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov) on or before October 14, 2024.

B. Brightspeed shall file Attachments A and B, supporting access line documentation separated by wire center and KUSF Zone, and its intrastate access rates, revenues, and usage for the twelve months ending September 30, 2024, in this Docket and provide electronic copies of Attachment A and B, in Excel format, to [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov) on or before October 14, 2024.

C. Excel copies of Attachments A and B can be located on the Commission's website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>.

D. A carrier not submitting data in a timely manner may be subject to penalties, pursuant to K.S.A. 66-138.

E. With respect to service, the Commission waives the requirement that the Attachments filed in this Docket be served upon all parties. Parties need only file the Attachments and supporting documentation and serve them upon the Commission. However, pleadings, motions, testimony, or other filings will need to be served on parties who enter their appearance, Staff counsel, and any appointed prehearing/presiding officer.

F. Entries of appearance will be required for active participation in this Docket, as explained above. Parties have fifteen (15) days to enter an appearance to become an active participant.

G. Staff's proposed Procedural Schedule in Paragraph 11, above, is adopted.


H. Parties are directed to inform Staff as soon as possible if they become aware of any computation error, thus allowing Staff to timely file revised calculations, if necessary.

I. 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).<sup>12</sup>

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 09/17/2024

  
\_\_\_\_\_  
Lynn M. Retz  
Executive Director

AAL

<sup>12</sup> K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

APPENDIX A

Docket No. 25-GIMT-141-GIT

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

NONDISCLOSURE CERTIFICATE OF CURB

I, \_\_\_\_\_, have been presented a copy of the Protective Order issued in Docket No. 25-GIMT-141-GIT on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

I have requested review of confidential information produced in the above-mentioned docket on behalf of \_\_\_\_\_.

I hereby certify that I have read the above-mentioned Protective Order and agree to abide by its terms and conditions.

Dated this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Printed name and title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party/Employer

\_\_\_\_\_  
Address (City, State and ZIP)

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Facsimile

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

Laura Kelly, Governor

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

**FROM:** Steve Garrett, Deputy Chief of Telecommunications  
Jeff McClanahan, Director of Utilities

**DATE:** September 4, 2024

**SUBJECT:** Docket No. 25-GIMT-141-GIT

In the Matter of an Investigation to Determine the Affordable Local Service Rates for Rate-of-Return Regulated Carriers and the Annual Assessment Rate for the Twenty-Ninth Year of the Kansas Universal Service Fund, Effective March 1, 2025.

### **EXECUTIVE SUMMARY**

The Commission opens a docket each year to determine the new Kansas Universal Service Fund (KUSF) assessment rate for the upcoming Fiscal Year (FY) and, for odd-numbered years, the Commission also determines the affordable residential and single-line business rates for the rural Local Exchange Carriers (RLECs).

Staff recommends the Commission issue an order to open a new docket to address the affordable residential and single-line business rates for the RLECs and the KUSF assessment rate for the twenty-ninth year of the KUSF, effective March 1, 2025, through February 28, 2026, (FY 29) and adopt the proposed Procedural Schedule set forth in this Report and Recommendation (R&R). Staff further recommends the Commission direct each RLEC and the Brightspeed Companies of Kansas (Brightspeed) to complete and file Attachment A and documentation to support the access lines reported in the Docket on or before October 14, 2024. Staff also recommends Brightspeed be directed to file Attachment B and separate its reported access lines in its documentation by wire center and KUSF Zone. Brightspeed will also need to file its intrastate access rates, revenues, and usage for the twelve-months ended September 30, 2024,<sup>1</sup> in the Docket by October 14, 2024.

Each company should be directed to provide an Excel copy of Attachment A and B, as applicable, to Staff at [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov) no later than October 14, 2024. Staff recommends the Commission include the following link in the Order to allow companies to download Attachment A, ILEC Access Line Report, and Attachment B, Brightspeed KUSF Report: <https://kcc.ks.gov/telecommunications/service-provider-forms>. Companies should be reminded that they may be subject to penalties if the required data is not filed in the Docket and provided to

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<sup>1</sup> *Order on Petition for Reconsideration*, Docket No. 08-GIMT-1023-GIT, April 23, 2010.

Staff in accordance with the Commission's Order. Staff also recommends a party notify Staff as soon as possible if it becomes aware of a computational error in Staff's testimony or calculations to allow Staff time to file revised calculations and testimony should the error impact our calculations.

## **BACKGROUND**

The Commission opens a docket each year to determine the new KUSF assessment rate for the next Fiscal Year. For odd-numbered years, the Commission must also determine the affordable local service rates for the RLECs.

K.S.A. 66-2005(d) authorizes an RLEC to increase its local rates to the Commission's approved affordable residential and single-line business rates. In order to determine appropriate KUSF support, K.S.A. 66-2005(e) authorized the affordable residential rate for RLECs to be based on the residential local service rates charged in all Kansas exchanges served by the RLECs and for rate groups 1 through 3<sup>2</sup> served by Brightspeed as of October 1, 2024. The affordable residential rate is calculated by multiplying a company's reported residential lines in service as of September 30, 2024, by its monthly service rate. As shown in Exhibit 1, the total revenue for all companies is divided by the aggregated number of residential lines and then divided by 12 to determine the monthly affordable residential rate. The resulting affordable residential rate must then rounded to the nearest quarter dollar. K.S.A. 66-2005(e)(1)(C) authorizes a maximum local rate increase of \$2.00 per year and K.S.A. 66-2005(e)(2) requires the affordable single-line business rate to be the greater of an RLEC's existing rate or \$3.00 higher than the affordable residential rate.

K.S.A. 66-2005(e)(5) requires that, if an RLEC increases a local service rate after February 20, 2002, pursuant to K.S.A. 66-2007(b), the RLEC's affordable rates are increased by an amount equal to the rate increase authorized under K.S.A. 66-2007(b). K.S.A. 66-2005(e)(7) authorizes an RLEC to adopt the same local service rate for both residential and single-line business service, referred to as a "unified" rate, with a unified rate deemed affordable if the rate generates an amount of revenue equal to or greater than the revenue that would be generated if the RLEC had separate residential and single-line business service rates. Lastly, K.S.A. 66-2005(e)(8) states this subsections' provisions do not apply if an RLEC does not receive KUSF support.

A short time frame exists between when the companies file their local service rate and access line data and Staff files its testimony with its proposed affordable rates and KUSF assessment rate in December. Staff, therefore, calculated the preliminary March 1, 2025, affordable rates, contained in Exhibit 1 and summarized in Table 1:

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<sup>2</sup> Rate Group 1 represents 1 to 1,500 access lines, Rate Group 2 represents 1,501 to 2,500 access lines, and Rate Group 3 represents greater than 2,501 access lines.

**Table 1: Preliminary Affordable Rates**

Company or Group	Residential Rate	No. of Lines	Percent of Lines
RLECs	\$18.83	38,179	83%
Brightspeed	19.48	7,981	17%
Total		46,160	100%
Weighted Average Rate	\$18.94		
<b>Residential Affordable Rate</b>	<b>\$19.00</b>		
<b>Business Affordable Rate</b>	<b>\$22.00</b>		

To calculate the preliminary \$19.00 affordable residential rate, Staff relied on each RLEC's and Brightspeed's<sup>3</sup> tariffed residential local service rate in effect as of September 1, 2024, and the residential lines in service as of December 31, 2024, as reported in the company's Annual Report for the year ended December 31, 2024. The calculation also recognizes the following:

1. Consolidated Communications of Kansas; Consolidated Communications of Missouri; Elkhart Telephone Company, Inc.; Haviland Telephone Company; LaHarpe Telephone Company, Inc.; MoKan Dial, Inc.; and Moundridge Telephone Company do not receive KUSF support, therefore, the actual rate tariffed by these companies was recognized;
2. Craw-Kan Telephone Cooperative, Inc. and Southern Kansas Telephone Co., Inc.'s monthly service rates exceed the affordable rates to recover costs associated with providing extended area service (EAS) and the EAS rate additives were removed; and
3. Home Telephone Co., Inc.; Pioneer Telephone Association, Inc.; Totah Telephone Company, Inc.; and United Telephone Association, Inc. have unified rates, with the service rate amount exceeding the affordable residential rate being excluded for calculation purposes.

## **ANALYSIS**

The RLECs and Brightspeed will need to report their residential and single-line business lines in service as of September 30, 2024, and their monthly local service rates, by rate group, as of October 1, 2024, on Attachment 1. The RLECs receiving KUSF support that have rates lower than the preliminary \$19.00 residential and the \$22.00 single-line business rates should use the preliminary rates to complete Attachment A. All companies should provide documentation supporting their reported access line data. Brightspeed will also need to complete Attachment B to calculate its preliminary KUSF FY 29 support and its intrastate access rate, usage, and revenue data for the twelve months ended September 30, 2024.<sup>4</sup>

Staff will need sufficient time to review and analyze the data filed by the companies and calculate the final RLEC affordable local service rates. Staff will also need to review and analyze data to calculate its proposed KUSF FY 29 assessment rate and write supporting testimony.

<sup>3</sup> Order Approving Tariff Revisions, Docket No. 18-UTDT-483-TAR, May 15, 2018.

<sup>4</sup> Order Setting Embarq's Intrastate Access Rates to Parity and Providing for Rebalancing Through the KUSF, Docket No. 08-GIMT-1023-GIT, March 10, 2010; Order on Petition for Reconsideration, April 23, 2010; and Order on Second Petition for Reconsideration, June 4, 2010.



Companies' that have formally entered their appearance in this docket (Intervenors) should file rebuttal testimony at least ten days prior to a hearing.<sup>5</sup> To allow companies sufficient time to change their billing systems, the Commission generally issues an Order adopting the new KUSF assessment rate and affordable rates in January. Staff, therefore, suggests the following Procedural Schedule:

<u>Description</u>	<u>Proposed Date</u>
Companies file data	October 14, 2024
Staff files Direct Testimony	December 13, 2024
Intervenors file Testimony	December 27, 2024
Staff Reply Testimony, if necessary	January 6, 2025
Evidentiary Hearing, if necessary	January 15, 2025
Order Adopting FY 29 Rates	January __, 2025

**RECOMMENDATION**

Staff recommends the Commission issue an order opening a docket to address the RLECs' affordable local service rates, the KUSF FY 29 assessment rate, and adopt the proposed Procedural Schedule. The RLECs and Brightspeed should be directed to file Attachment A and provide an electronic copy, in Excel format, to Staff on or before October 14, 2024. Brightspeed should be directed to also file Attachment B, its intrastate access rate, revenue, and usage data for the twelve months ended September 30, 2024, and supporting documentation in the Docket and provide Excel copies to Staff no later than October 14, 2024.

Staff recommends the order include the following link to allow companies to download Attachments A and B: <https://kcc.ks.gov/telecommunications/service-provider-forms>. Staff further recommends the Commission remind all companies they may be subject to penalties if their data is not filed or provided to Staff by the due date. In addition, the companies should contact Staff as soon as possible if they become aware of any computational error in Staff's calculations to allow Staff time to file revised calculations and testimony should the error impact our calculations.

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<sup>5</sup> K.A.R. 82-1-229.

Calculation of  
Rate-of-Return LEC Affordable Rates

COMPANY	Tariffed Res Rate (9/30/2024) (A)	Rate Used for Avg Rate Calc (B)	9/30/2024 Res Line Count (l) (C)	Revenue (D = B x C)	Comments (E)
Blue Valley (All Exchanges)	18.75	18.75	1,725	32,344	Docket 17-304
Columbus	18.75	18.75	216	4,050	Will receive KUSF, Docket No. 22-546. Docket 17-307
Consolidated Communications KS Cedar Point & Saffordville Exchanges (former Bluestem)	24.24	24.24	163	3,951	Does not receive KUSF Increased rates in Docket Nos. 12-621, 13-643, 20-331, 21-288, & 22-378. Cedar Point & Saffordville Exchanges affordable rate for KUSF will be \$7.50 above RLEC affordable rate. Americus Exchange affordable rate for KUSF will be \$7.38 above RLEC affordable rate.
All other Exchanges	20.77	20.77	511	10,613	Does not receive KUSF Increased rates in Docket Nos. 12-621, 13-643, 20-331, 21-288, & 22-378. All other exchanges except Jetmore affordable rate for KUSF will be \$7.50 above RLEC affordable rate. Jetmore Exchange affordable rate for KUSF will be \$7.18 above RLEC affordable rate.
Consolidated Communications MO	22.50	22.50	65	1,463	Does not receive KUSF. Increased rates in Docket Nos. 12-622, 13-642, 20-327, 21-304, & 22-401. Company's affordable rate for KUSF will be \$7.50 above RLEC affordable rate.
Craw-Kan	19.36	18.75	7,569	141,919	Docket 04-701 added \$0.61 for EAS Dockets 17-303, 21-095
Cummingham	18.75	18.75	693	12,994	Docket 17-293
Elkhart	18.75	18.75	580	10,875	Docket 17-294
Golden Belt	20.25	20.25	1,608	32,562	Docket Nos. 12-638, 17-008, 21-095
Gorham - All Exchanges	18.75	18.75	306	5,738	Docket 17-288
H&B Comm.	18.75	18.75	137	2,569	Docket 17-313
Haviland	18.75	18.75	1,115	20,906	Does not receive KUSF Docket Nos. 12-408, 19-056, 21-095
Home	19.10	18.75	1,132	21,225	Unified Rate Docket 17-295
JBN	18.75	18.75	814	15,263	Docket 21-095
KanOkla	18.75	18.75	702	13,163	Docket 17-564 (reduced to \$17.25), 21-095
LaHarpe	18.75	18.75	221	4,144	Does not receive KUSF. Docket 17-296
Madison	18.75	18.75	220	4,125	Docket 17-308
MoKan	16.60	16.60	714	11,852	Does not receive KUSF Increased rates in Docket Nos. 13-519, 14-348, & 15-351. Company's affordable rate will be \$4.50 above affordable rate.
Moundridge	18.75	18.75	536	10,050	Does not receive KUSF Docket 17-008
Mutual	18.75	18.75	180	3,375	Docket 17-297
Peoples	18.75	18.75	886	16,613	Docket 17-312
Pioneer	20.50	18.75	1,979	37,106	Unified Rate Additive \$1.75/line Docket 21-095
Rainbow	18.75	18.75	910	17,063	Docket 17-291, 21-095
Rural (All exchanges)	18.75	18.75	2,588	48,525	Docket 21-095
S&A	18.75	18.75	346	6,488	Docket 21-095
S&T	18.75	18.75	953	17,869	Docket 17-292
South Central	18.75	18.75	652	12,225	Docket 21-095
Southern KS -Others	18.75	18.75	569	10,669	Docket 02-1014 (EAS for Clearwater) Docket 21-095
Southern KS - Clearwater	26.70	18.65	508	9,474	Docket 02-1014: EAS additive (Clearwater) Docket 17-284
Totah	19.10	18.75	409	7,669	Unified Rate Additive \$.35/line Docket 21-095
Tri-County	18.75	18.75	1,652	30,975	Docket 17-302
Council Grove	18.75	18.75	732	13,725	Docket 17-302
Twin Valley (RG 1-3)	18.75	18.75	2,008	37,650	Docket 17-311
United Tele. Assoc.	19.75	18.75	2,813	52,744	Unified Rate Additive \$1.00/line Docket 21-095
Wamego	18.75	18.75	557	10,444	Docket 17-285
Wheat State	18.75	18.75	909	17,044	Docket 17-287
Wilson	18.75	18.75	405	7,594	Docket 17-286
Zenda	18.75	18.75	96	1,800	Docket 21-095
<b>RLEC TOTAL</b>		<b>\$ 18.83</b>	<b>38,179</b>	<b>\$ 718,853</b>	
		<b>Avg Rate</b>	<b>Lines</b>	<b>Weighted Rev</b>	<b>Lines</b>
RLECs		\$ 18.83	38,179	\$ 718,853	83%
Brightspeed RG 1 - 3 [2]		19.48	7,981	155,470	17%
Affordable Rate Calculation		<b>\$ 18.94</b>	<b>\$ 46,160</b>	<b>\$ 874,323</b>	<b>100%</b>
Rounded to Nearest Quarter- Dollar, 3/1/2025:					
Residential Affordable Rate		<b>\$ 19.00</b>			
Business Affordable Rate		<b>\$ 22.00</b>			
Notes:					
1. Include residential lines in bundles and concession lines.					
2. Order Approving Tariff Revisions, Docket No. 18-UTDT-483-TAR, May 15, 2018.					

**Company Information**

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**Company Name:** \_\_\_\_\_

**KUSF Carrier Identification Code:** KS0000 \_\_\_\_\_

**Submission Date:** \_\_\_\_\_

**Street:** \_\_\_\_\_

**City/State/Zip:** \_\_\_\_\_

**Contact Name:** \_\_\_\_\_

**Contact Phone #:** \_\_\_\_\_

**E-Mail Address:** \_\_\_\_\_

**Lines in Service as of:** \_\_\_\_\_ 9/30/2024

**Company Officer/Title:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

Line	Description	No. Lines
1	Residential Lines as of 9/30/2024:	
2	Residential - City	_____
3	Residential - Rural	_____
4	Residential - Concession	_____
5	Residential - Other	_____
<b>6</b>	<b>Total Residential Lines</b>	<b>_____</b> <b>_____</b>
7	Business Lines as of 9/30/2024:	
8	Single-Line Business	_____
9	Multi-Line Business	_____
10	Concession Lines	_____
11	Key Lines	_____
12	Lines terminating in PBX, Centrex, or Hunt Group	_____
13	Primary Line Interface Arrangments (Each PRI = 5 lines)	_____
14	Company Official	_____
15	Payphones:	_____
16	Company Owned	_____
17	Non-Company Owned	_____
18	Other (Please Describe)	_____
		_____
<b>19</b>	<b>Total Business Lines</b>	<b>_____</b> <b>_____</b>
<b>20</b>	<b>Total Lines (Line 6 + Line 19)</b>	<b>_____</b> <b>_____</b>

Residential and Business Lines and Rates  
(RLECs and Brightspeed)

**Company:** \_\_\_\_\_

Instructions: Report the number of lines and local rate, as of September 30 and October 1, 2024, respectively. If your company has more than 1 rate group, list each rate group separately. (K.S.A. 66-2005). Please complete even if your Company does not receive KUSF support.

Maximum Rate increase is \$2.00 per line per year.

<b>RESIDENCE</b>					
Current Rate Level Oct. 1, 2024 (a)	Monthly Rate Increase (b)	New Rate Level March 1, 2025 (c = a + b)	Number Lines Sept. 30, 2024 (d)	Rev/Month e=(b x d)	Rev/Yr. f=(e x 12)
	\$ -	\$ -		\$ -	\$ -
	\$ -	\$ -		\$ -	\$ -
	\$ -	\$ -		\$ -	\$ -
<b>Total-Residential</b>			-	\$ -	\$ -

<b>BUSINESS (Excludes Company-Official Lines)</b>					
Current Rate Level Oct. 1, 2024 (a)	Monthly Rate Increase (b)	New Rate Level March 1, 2025 (c = a + b)	Number Lines Sept. 30, 2024 (d)	Rev/Month e=(b x d)	Rev/Yr. f=(e x 12)
	\$ -	\$ -		\$ -	\$ -
	\$ -	\$ -		\$ -	\$ -
	\$ -	\$ -		\$ -	\$ -
<b>Total Business</b>			-	\$ -	\$ -

<b>Grand Total: Residence &amp; Business</b>			
		Rev/Month	Rev/Yr.
Residential Total		\$ -	\$ -
Business Total		-	-
<b>Total: Residence &amp; Business</b>		\$ -	\$ -

<u>Category:</u>	<u>Comments</u>
Residential Lines	Retail residential lines located in a "high-cost" area as determined by the Commission (Order No. 10, Docket 99-GIMT-326-GIT).
Business Lines	Retail single-line and multi-line business lines located in a "high-cost" area as determined by the Commission. (Order No. 10, Docket No. 99-GIMT-326-GIT).
Company-Official Lines	Lines do not produce end-user revenues, are not subject to KUSF assessment, and do not qualify for KUSF support. (Order Determining Assessment for the KUSF Starting March 1, 2001, Docket No. 01-GIMT-235-GIT, Jan. 19, 2001; Order Determining Remaining Issue, Jan. 17, 2002 ).
Key Lines, PBX, Centrex, Hunt Lines	All Key Lines and Lines terminating in a Centrex, PBX, or Hunt Group are assessable lines. These lines do not qualify for KUSF support. (Order Addressing Synchronization of Counting Single-Line Business Lines. Docket No. 99-GIMT-326-GIT. Julv 22. 2002).
Concession Lines	Concession Lines are assessed the KUSF percentage rate on revenues billed. For local rate rebalancing purposes, include concession lines as if they are billed at the normal monthly rate. (Docket No. 01-GIMT-235-GIT, Jan. 19, 2001 Order Determining Assessment for the KUSF Starting March 1, 2001; Jan. 17, 2002 Order Determining Remaining Issue).
Payphones	All coin lines, including access lines to the company's own payphones or payphones owed by other providers. (Docket 01-GIMT-235-GIT).
Primary Rate Interface (PRI) Arrangements	Consist of 24 channels (23 B channels plus one D channel for signaling) & generally used by large businesses in a PBX-type setting and therefore, treated like PBX, Centrex, and other Hunt Group Settings. (Docket 09-GIMT-272-GIT). Count each arrangement as 5 lines. (Order Setting the Kansas Universal Service Fund Assessment Rate for Year Fourteen and Canceling January 20, 2009 Technical Hearing, Docket No. I0-GIMT-188-GIT, Jan. 13, 2010).
Other Lines	May include: one-way (Internet, Fire, alarm), Kansas non-jurisdictional, or other lines. Please describe lines reported in this category. Lines that do not provide 2-way voice grade service or that are not subject to the KCC's jurisdiction are not eligible for KUSF support or subject to the KUSF assessment.

Notes:

See also Docket No. 10-GIMT-667-GIT, September 24, 2010 Order.

Calculation of Gross  
KUSF Support  
Brightspeed

		As of September 30, 2021 (Note 1)						As of September 30, 2022 (Note 1)					
		ZONE 1			ZONE 2			ZONE 1			ZONE 2		
Wire Center	Study Area	Total Supported Lines	KUSF Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Alta Vista	Eastern	\$	18.19	\$ -	\$	100.01	\$ -	\$	18.19	\$ -	\$	100.01	\$ -
Altoona	Eastern	\$	21.80	\$ -	\$	91.96	\$ -	\$	21.80	\$ -	\$	91.96	\$ -
Belle Plaine	Eastern	\$	-	\$ -	\$	31.13	\$ -	\$	-	\$ -	\$	31.13	\$ -
Benedict	Eastern	\$	-	\$ -	\$	117.03	\$ -	\$	-	\$ -	\$	117.03	\$ -
Blue Mound	Eastern	\$	40.47	\$ -	\$	114.80	\$ -	\$	40.47	\$ -	\$	114.80	\$ -
Bucyrus	Eastern	\$	-	\$ -	\$	39.07	\$ -	\$	-	\$ -	\$	39.07	\$ -
Buffalo	Eastern	\$	-	\$ -	\$	70.97	\$ -	\$	-	\$ -	\$	70.97	\$ -
Centropolis	Eastern	\$	-	\$ -	\$	69.73	\$ -	\$	-	\$ -	\$	69.73	\$ -
Circleville	Eastern	\$	34.46	\$ -	\$	90.67	\$ -	\$	34.46	\$ -	\$	90.67	\$ -
Conway	Eastern	\$	-	\$ -	\$	98.49	\$ -	\$	-	\$ -	\$	98.49	\$ -
Coyville	Eastern	\$	-	\$ -	\$	88.71	\$ -	\$	-	\$ -	\$	88.71	\$ -
Delia	Eastern	\$	-	\$ -	\$	84.53	\$ -	\$	-	\$ -	\$	84.53	\$ -
Denison	Eastern	\$	29.99	\$ -	\$	84.00	\$ -	\$	29.99	\$ -	\$	84.00	\$ -
Durham	Eastern	\$	-	\$ -	\$	103.19	\$ -	\$	-	\$ -	\$	103.19	\$ -
Easton	Eastern	\$	7.74	\$ -	\$	43.71	\$ -	\$	7.74	\$ -	\$	43.71	\$ -
Edgerton	Eastern	\$	-	\$ -	\$	21.98	\$ -	\$	-	\$ -	\$	21.98	\$ -
Effingham	Eastern	\$	4.01	\$ -	\$	59.56	\$ -	\$	4.01	\$ -	\$	59.56	\$ -
Emmett	Eastern	\$	39.17	\$ -	\$	93.49	\$ -	\$	39.17	\$ -	\$	93.49	\$ -
Fall River	Eastern	\$	-	\$ -	\$	68.10	\$ -	\$	-	\$ -	\$	68.10	\$ -
Fontana	Eastern	\$	-	\$ -	\$	47.58	\$ -	\$	-	\$ -	\$	47.58	\$ -
Gardner	Eastern	\$	-	\$ -	\$	3.08	\$ -	\$	-	\$ -	\$	3.08	\$ -
Greeley	Eastern	\$	8.04	\$ -	\$	66.26	\$ -	\$	8.04	\$ -	\$	66.26	\$ -
Gridley	Eastern	\$	14.80	\$ -	\$	109.86	\$ -	\$	14.80	\$ -	\$	109.86	\$ -
Harveyville	Eastern	\$	24.75	\$ -	\$	82.47	\$ -	\$	24.75	\$ -	\$	82.47	\$ -
Heston	Eastern	\$	-	\$ -	\$	17.30	\$ -	\$	-	\$ -	\$	17.30	\$ -
Hoyt	Eastern	\$	5.81	\$ -	\$	45.96	\$ -	\$	5.81	\$ -	\$	45.96	\$ -
Inman	Eastern	\$	-	\$ -	\$	42.76	\$ -	\$	-	\$ -	\$	42.76	\$ -
Lafontaine	Eastern	\$	-	\$ -	\$	125.45	\$ -	\$	-	\$ -	\$	125.45	\$ -
Lancaster	Eastern	\$	4.09	\$ -	\$	51.05	\$ -	\$	4.09	\$ -	\$	51.05	\$ -
Lane	Eastern	\$	-	\$ -	\$	32.96	\$ -	\$	-	\$ -	\$	32.96	\$ -
Lebo	Eastern	\$	2.99	\$ -	\$	77.37	\$ -	\$	2.99	\$ -	\$	77.37	\$ -
Lehigh	Eastern	\$	41.68	\$ -	\$	117.10	\$ -	\$	41.68	\$ -	\$	117.10	\$ -
Leroy	Eastern	\$	17.48	\$ -	\$	111.73	\$ -	\$	17.48	\$ -	\$	111.73	\$ -
Linwood	Eastern	\$	8.12	\$ -	\$	29.30	\$ -	\$	8.12	\$ -	\$	29.30	\$ -
Mapleton	Eastern	\$	-	\$ -	\$	93.54	\$ -	\$	-	\$ -	\$	93.54	\$ -
Mayetta	Eastern	\$	16.87	\$ -	\$	51.20	\$ -	\$	16.87	\$ -	\$	51.20	\$ -
Mclouth	Eastern	\$	3.77	\$ -	\$	50.21	\$ -	\$	3.77	\$ -	\$	50.21	\$ -
Meriden	Eastern	\$	1.17	\$ -	\$	28.18	\$ -	\$	1.17	\$ -	\$	28.18	\$ -
Michigan Valley	Eastern	\$	-	\$ -	\$	86.39	\$ -	\$	-	\$ -	\$	86.39	\$ -
Mound City	Eastern	\$	1.71	\$ -	\$	53.47	\$ -	\$	1.71	\$ -	\$	53.47	\$ -
Neosho Falls	Eastern	\$	-	\$ -	\$	93.55	\$ -	\$	-	\$ -	\$	93.55	\$ -
Nortonville	Eastern	\$	5.83	\$ -	\$	57.07	\$ -	\$	5.83	\$ -	\$	57.07	\$ -
Osage City	Eastern	\$	-	\$ -	\$	37.89	\$ -	\$	-	\$ -	\$	37.89	\$ -
Overbrook	Eastern	\$	1.30	\$ -	\$	54.24	\$ -	\$	1.30	\$ -	\$	54.24	\$ -
Oxford	Eastern	\$	-	\$ -	\$	49.26	\$ -	\$	-	\$ -	\$	49.26	\$ -

Notes:

1. Reflect line location corrections approved by the Commission in Docket No. 16-GIMT-511-GIT.
2. Listed wire centers are high-cost and eligible for KUSF support.

Calculation of Gross  
KUSF Support  
Brightspeed

		As of September 30, 2021 (Note 1)						As of September 30, 2022 (Note 1)					
		ZONE 1			ZONE 2			ZONE 1			ZONE 2		
Wire Center	Study Area	Total Supported Lines	KUSF Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Ozawkie	Eastern		\$ 7.56	\$ -		\$ 38.45	\$ -		\$ 7.56	\$ -		\$ 38.45	\$ -
Parker	Eastern		\$ 12.16	\$ -		\$ 67.36	\$ -		\$ 12.16	\$ -		\$ 67.36	\$ -
Perry	Eastern		\$ 0.15	\$ -		\$ 36.68	\$ -		\$ 0.15	\$ -		\$ 36.68	\$ -
Piqua	Eastern		\$ -	\$ -		\$ 117.23	\$ -		\$ -	\$ -		\$ 117.23	\$ -
Princeton	Eastern		\$ 8.28	\$ -		\$ 67.05	\$ -		\$ 8.28	\$ -		\$ 67.05	\$ -
Quincy	Eastern		\$ -	\$ -		\$ 243.23	\$ -		\$ -	\$ -		\$ 243.23	\$ -
Richmond	Eastern		\$ 9.84	\$ -		\$ 69.69	\$ -		\$ 9.84	\$ -		\$ 69.69	\$ -
Rossville	Eastern		\$ -	\$ -		\$ 45.52	\$ -		\$ -	\$ -		\$ 45.52	\$ -
Silver Lake	Eastern		\$ -	\$ -		\$ 27.20	\$ -		\$ -	\$ -		\$ 27.20	\$ -
Spring Hill	Eastern		\$ 0.41	\$ -		\$ 21.46	\$ -		\$ 0.41	\$ -		\$ 21.46	\$ -
St. Marys	Eastern		\$ -	\$ -		\$ 15.95	\$ -		\$ -	\$ -		\$ 15.95	\$ -
Thayer	Eastern		\$ 11.90	\$ -		\$ 75.96	\$ -		\$ 11.90	\$ -		\$ 75.96	\$ -
Toronto	Eastern		\$ 14.09	\$ -		\$ 80.33	\$ -		\$ 14.09	\$ -		\$ 80.33	\$ -
Walton	Eastern		\$ 12.47	\$ -		\$ 70.57	\$ -		\$ 12.47	\$ -		\$ 70.57	\$ -
Wellsville	Eastern		\$ -	\$ -		\$ 41.21	\$ -		\$ -	\$ -		\$ 41.21	\$ -
Winchester	Eastern		\$ 1.11	\$ -		\$ 60.84	\$ -		\$ 1.11	\$ -		\$ 60.84	\$ -
Windom	Eastern		\$ -	\$ -		\$ 60.58	\$ -		\$ -	\$ -		\$ 60.58	\$ -
Abbeyville	S. Central		\$ -	\$ -		\$ 59.22	\$ -		\$ -	\$ -		\$ 59.22	\$ -
Alden	S. Central		\$ 27.44	\$ -		\$ 45.06	\$ -		\$ 27.44	\$ -		\$ 45.06	\$ -
Arlington	S. Central		\$ 10.55	\$ -		\$ 71.51	\$ -		\$ 10.55	\$ -		\$ 71.51	\$ -
Belpre	S. Central		\$ -	\$ -		\$ 72.04	\$ -		\$ -	\$ -		\$ 72.04	\$ -
Claffin	S. Central		\$ 6.34	\$ -		\$ 75.04	\$ -		\$ 6.34	\$ -		\$ 75.04	\$ -
Cunningham	S. Central		\$ 15.68	\$ -		\$ 109.55	\$ -		\$ 15.68	\$ -		\$ 109.55	\$ -
Hoisington	S. Central		\$ -	\$ -		\$ 49.76	\$ -		\$ -	\$ -		\$ 49.76	\$ -
Hudson	S. Central		\$ -	\$ -		\$ 57.73	\$ -		\$ -	\$ -		\$ 57.73	\$ -
Langdon	S. Central		\$ -	\$ -		\$ 67.61	\$ -		\$ -	\$ -		\$ 67.61	\$ -
Macksville	S. Central		\$ -	\$ -		\$ 43.76	\$ -		\$ -	\$ -		\$ 43.76	\$ -
Murdock	S. Central		\$ -	\$ -		\$ 92.68	\$ -		\$ -	\$ -		\$ 92.68	\$ -
Partridge	S. Central		\$ 13.29	\$ -		\$ 64.25	\$ -		\$ 13.29	\$ -		\$ 64.25	\$ -
Preston	S. Central		\$ -	\$ -		\$ 87.12	\$ -		\$ -	\$ -		\$ 87.12	\$ -
Pretty Prairie	S. Central		\$ 9.13	\$ -		\$ 70.83	\$ -		\$ 9.13	\$ -		\$ 70.83	\$ -
St. John	S. Central		\$ 0.42	\$ -		\$ 73.11	\$ -		\$ 0.42	\$ -		\$ 73.11	\$ -
Sterling	S. Central		\$ -	\$ -		\$ 33.26	\$ -		\$ -	\$ -		\$ 33.26	\$ -
Sylvia	S. Central		\$ -	\$ -		\$ 48.80	\$ -		\$ -	\$ -		\$ 48.80	\$ -
Subtotal		-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -

Notes:

1. Reflect line location corrections approved by the Commission in Docket No. 16-GIMT-511-GIT.
2. Listed wire centers are high-cost and eligible for KUSF support.



Calculation of Gross  
KUSF Support  
Brightspeed

		As of September 30, 2021 (Note 1)						As of September 30, 2022 (Note 1)					
		ZONE 1			ZONE 2			ZONE 1			ZONE 2		
Wire Center	Study Area	Total Supported Lines	KUSF Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)
Riverton	South East		\$ 5.38	\$ -		\$ 36.70	\$ -		\$ 5.38	\$ -		\$ 36.70	\$ -
Scammon	South East		\$ 2.06	\$ -		\$ 28.18	\$ -		\$ 2.06	\$ -		\$ 28.18	\$ -
Subtotal		-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -
Alma	United		\$ -	\$ -		\$ 63.41	\$ -		\$ -	\$ -		\$ 63.41	\$ -
Altamont	United		\$ 0.82	\$ -		\$ 57.60	\$ -		\$ 0.82	\$ -		\$ 57.60	\$ -
Baldwin	United		\$ -	\$ -		\$ 20.81	\$ -		\$ -	\$ -		\$ 20.81	\$ -
Buhler	United		\$ -	\$ -		\$ 26.31	\$ -		\$ -	\$ -		\$ 26.31	\$ -
Burlingame	United		\$ -	\$ -		\$ 27.66	\$ -		\$ -	\$ -		\$ 27.66	\$ -
Burlington	United		\$ -	\$ -		\$ 32.11	\$ -		\$ -	\$ -		\$ 32.11	\$ -
Burrton	United		\$ 9.41	\$ -		\$ 82.62	\$ -		\$ 9.41	\$ -		\$ 82.62	\$ -
Ellinwood	United		\$ -	\$ -		\$ 37.54	\$ -		\$ -	\$ -		\$ 37.54	\$ -
Eskridge	United		\$ -	\$ -		\$ 95.25	\$ -		\$ -	\$ -		\$ 95.25	\$ -
Fredonia	United		\$ -	\$ -		\$ 4.78	\$ -		\$ -	\$ -		\$ 4.78	\$ -
Garnett	United		\$ -	\$ -		\$ 21.33	\$ -		\$ -	\$ -		\$ 21.33	\$ -
Haven	United		\$ -	\$ -		\$ 9.16	\$ -		\$ -	\$ -		\$ 9.16	\$ -
Highland	United		\$ -	\$ -		\$ 21.49	\$ -		\$ -	\$ -		\$ 21.49	\$ -
Hillsboro	United		\$ -	\$ -		\$ 13.26	\$ -		\$ -	\$ -		\$ 13.26	\$ -
Kincaid	United		\$ -	\$ -		\$ 54.52	\$ -		\$ -	\$ -		\$ 54.52	\$ -
Lyndon	United		\$ -	\$ -		\$ 28.81	\$ -		\$ -	\$ -		\$ 28.81	\$ -
Melvern	United		\$ -	\$ -		\$ 60.74	\$ -		\$ -	\$ -		\$ 60.74	\$ -
Moran	United		\$ 7.46	\$ -		\$ 72.61	\$ -		\$ 7.46	\$ -		\$ 72.61	\$ -
Morrill	United		\$ -	\$ -		\$ 36.76	\$ -		\$ -	\$ -		\$ 36.76	\$ -
Mound Valley	United		\$ 15.01	\$ -		\$ 78.78	\$ -		\$ 15.01	\$ -		\$ 78.78	\$ -
Oskaloosa	United		\$ -	\$ -		\$ 26.07	\$ -		\$ -	\$ -		\$ 26.07	\$ -
Oswego	United		\$ -	\$ -		\$ 24.81	\$ -		\$ -	\$ -		\$ 24.81	\$ -
Pomona	United		\$ -	\$ -		\$ 28.28	\$ -		\$ -	\$ -		\$ 28.28	\$ -
Powhattan	United		\$ -	\$ -		\$ 51.81	\$ -		\$ -	\$ -		\$ 51.81	\$ -
Quenemo	United		\$ -	\$ -		\$ 111.32	\$ -		\$ -	\$ -		\$ 111.32	\$ -
Troy	United		\$ -	\$ -		\$ 45.65	\$ -		\$ -	\$ -		\$ 45.65	\$ -
Valley Falls	United		\$ -	\$ -		\$ 26.42	\$ -		\$ -	\$ -		\$ 26.42	\$ -
Wathena	United		\$ 2.68	\$ -		\$ 45.16	\$ -		\$ 2.68	\$ -		\$ 45.16	\$ -
Waverly	United		\$ 1.12	\$ -		\$ 84.23	\$ -		\$ 1.12	\$ -		\$ 84.23	\$ -
Westphalia	United		\$ -	\$ -		\$ 75.84	\$ -		\$ -	\$ -		\$ 75.84	\$ -
White Cloud	United		\$ 14.45	\$ -		\$ 69.22	\$ -		\$ 14.45	\$ -		\$ 69.22	\$ -
Subtotal		-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -
Total Company		-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -
Grand Total - Company		-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -	-	\$ -	\$ -

Notes:

1. Reflect line location corrections approved by the Commission in Docket No. 16-GIMT-511-GIT.
2. Listed wire centers are high-cost and eligible for KUSF support.

**CERTIFICATE OF SERVICE**

25-GIMT-141-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of first class mail and electronic service on 09/17/2024

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25-GIMT-141-GIT

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