2011.11.02 16:38:22 Kansas Corporation Commission /S/ Patrice Petersen-Klein

R_{eceived}

077

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

		0 °
In the Matter of Staff's Motion Requesting the)	State 2011
Commission Order S&T Telephone Coop)	DOLEN BY
Association, Incl. to Submit to an Audit for)	Docket No. 12-S&TT-234-KSF of Religion Con
Purposes of Determining its Cost-Based Kansas)	A Sansas Commission
Universal Service Fund Support, Pursuant to)	97
K.S.A. 66-2008.)	

STAFF REPLY

COMES NOW the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively), and submits its reply to the response of S&T Telephone Cooperative Association, Inc. ("S&T") to Staff's motion to submit S&T to an audit. Staff states as follows:

- 1. On October 7, 2011, Staff filed a motion in this docket asking the Commission to order S&T to submit to an audit for purposes of determining its cost-based Kansas Universal Service Fund support, pursuant to K.S.A. 66-2008(e).
- 2. On October 19, 2011, S&T filed a response. S&T requested that it be allowed to wait until March 2012 to make its compliance filing in order to allow S&T to include its 2011 financial data.
 - 3. Staff has no objection to this request.

WHEREFORE, Staff submits that it does not object to the request made by S&T in its response.

Respectfully submitted, acad

Matthew A. Spurgin, #20470

Litigation Counsel

1500 SW Arrowhead Rd.

Topeka, KS 66604

785-271-3110

785-271-3167 (fax)

m.spurgin@kcc.ks.gov

for Commission Staff

STATE OF KANSAS)	
) ss	
COUNTY OF SHAWNEE)	

VERIFICATION

Matthew A. Spurgin, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Reply* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.

Matthew A. Spurgin, # 20470

Kansas Corporation Commission of the

State of Kansas

Subscribed and sworn to before me this 2^{nd} day of November, 2011.

VICKI D. JACOBSEN

Notary Public - State of Kansas

My Appt. Expires (0-30-14

Victi D. Jacobsen Notary Public

My Appointment Expires: 6-30-14

CERTIFICATE OF SERVICE

12-S&TT-234-KSF

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Staff Reply was placed in the United States mail, postage prepaid, or hand-delivered this 3rd day of November, 2011, to the following:

JAMES M. CAPLINGER, ATTORNEY JAMES M. CAPLINGER, CHARTERED 823 W 10TH STREET TOPEKA, KS 66612 Fax: 785-232-0724 jim@caplinger.net

MATTHEW SPURGIN, ASSISTANT LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604-4027 Fax: 785-271-3167 m.spurgin@kcc.ks.gov ****Hand Delivered****

CAROLYN R. SOMERS, CFO S&T TELEPHONE COOPERATIVE ASSOCIATION, INC. 320 KANSAS AVENUE PO BOX 99 BREWSTER, KS 67732 Fax: 785-694-2750 crsomers@st-tel.net COLLEEN R. HARRELL JAMES M. CAPLINGER, CHARTERED 823 W 10TH STREET TOPEKA, KS 66612 Fax: 785-232-0724 colleen@caplinger.net

STEVE RICHARDS, GENERAL MANAGER
S&T TELEPHONE COOPERATIVE ASSOCIATION, INC.
320 KANSAS AVENUE
PO BOX 99
BREWSTER, KS 67732
Fax: 785-694-2750
srichards@st-tel.net

KEVIN KELLY, DIRECTOR OF REGULATORY TCA INC 526 CHAPEL HILLS DR STE 100 COLORADO SPRINGS, CO 80920-1030 Fax: 719-266-4335 kkelly@tcatel.com

Vicki Jacobsen