

GVNW CONSULTING, INC.

2270 LA MONTANA WAY#100 COLORADO SPRINGS, CO 80918 TEL. 719.594.5800 www.gvnw.com

July 25, 2019

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

RE: Docket No. 19-BOWZ-032-KSF

In the Matter of the Audit of Boomerang Wireless, LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A 2017 Supp. 66-2010(b) for KUSF Operating Year 21, Fiscal Year March 2017-February 2018.

Dear Ms. Retz:

On May 23, 2019, the Kansas Corporation Commission (KCC or Commission) issued an Order adopting GVNW Consulting, Inc.'s (GVNW) Audit Report and directed Boomerang Wireless, LLC (Boomerang or Company) to: (1) file annual True-ups for Operating Years 21 and 22 to report the actual amount of KUSF assessments collected from subscribers in Box C and notify GVNW's auditor to allow for review of the revisions; (2) file, in this Docket, an affidavit attesting it has implemented procedures and processes to report the correct amount of KUSF assessments collected from subscribers and confirm the revised March through September 2018 CRWs report the correct intrastate revenue to the KUSF, within 60-days of the Commission's Order; and (3) implement procedures to ensure it retains copies of both the front and back of the Kansas Benefits card with a recipient's signature until such time as the National Verifier is implemented in Kansas.

On June 28, 2019, the Company notified GVNW that it filed True-ups for Operating Years 21 and 22, reporting the actual amount of the KUSF assessments collected from subscribers in Box C. GVNW reviewed the True-ups and determined the amounts reported in Box C are accurate.

On July 19, 2019, the Company filed, in this Docket, an affidavit attesting to procedures and processes it implemented to report the actual amount of KUSF assessments collected from subscribers, as ordered by the Commission. Boomerang advised GVNW that it will implement procedures to ensure it retains copies of both the front and back of the Kansas Benefits card. However, going forward, this will not be necessary once the state is participating in the National Verifier.

GVNW recommends that the Commission determine Boomerang is in compliance with the Commission's Order and that Docket No. 19-BOWZ-032-KSF be closed.

Sincerely,

Dennis C. Smith Consultant

cc w/encl: Sandy Reams

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of July 2019, the above Kansas Universal Service Fund Audit Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

Kansas Corporation Commission 1500 S.W. Arrowhead Road Topeka, KS 66604

Dennis Henderson, CEO BOOMERANG WIRELESS, LLC 955 Kacena Rd Ste A Hiawatha, IA 52233

Email: dhenderson@readywireless.com

Nicole Stephens, KUSF Administrator Manager GVNW Consulting, Inc. 2930 Montvale Dr., Ste. B Springfield, IL 62704

Email: nstephens@gvnw.com

Judi Ushio, Midwest Division Manager GVNW Consulting, Inc. 2270 La Montana Way #100 Colorado Springs, CO 80918

Email: jushio@gvnw.com

Walker Hendrix, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, KS 66604

Email: w.hendrix@kcc.ks.gov

Dennis C. Smith