



June 27, 2022

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

RE: Docket No. 22-BUYC-035-KSF (Company Code KS004854)

In the Matter of the Audit of inContact, Inc. by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for Fiscal Year 24, March 2020 - February 2021

Dear Ms. Retz:

Attached is a Motion for Extension of Time for Vantage Point Solutions, Inc., the KUSF Administrator, to File Audit Report for inContact, Inc. for filing in the referenced Docket.

If you have any questions or need further information, please do not hesitate to contact me at 605-995-1746 or by e-mail at julie.darrington@vantagepnt.com.

Thank you for your cooperation.

Sincerely,

Julie Darrington
VP of Consulting

Attachments

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2022, the above Kansas Universal Service Fund Motion for Extension of Time to File Audit 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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Julie Darrington

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

In the Matter of the Audit of inContact,)	
Inc. by the Kansas Universal Service)	
Fund (KUSF) Administrator Pursuant to)	Docket No. 22-BUYC-035-KSF
K.S.A. 66-2010(b) for Fiscal Year 24,)	
March 2020 - February 2021)	

**MOTION FOR EXTENSION OF TIME FOR KUSF ADMINISTRATOR
TO FILE AUDIT REPORT FOR
inCONTACT, INC.**

Vantage Point Solutions, Inc. (VPS), the Kansas Universal Service Fund (KUSF) Administrator, requests the Kansas Corporation Commission (KCC or Commission) of the State of Kansas to issue an order extending the date by which VPS shall file its audit report from June 30, 2022, to July 20, 2022. In support of its Motion, VPS states that:

1. On July 27, 2021, the Commission issued an Order opening this Docket and directing VPS to commence an audit of inContact, Inc. (inContact or Company) for the period of March 1, 2020, through February 28, 2021, (KUSF Operating Year 24) for KUSF purposes (Opening Order). The Commission directed VPS to complete and file its audit report by June 30, 2021.

2. On July 27, 2021, VPS emailed inContact at compliance@niceincontact.com requesting the Point of Contact(s) (POC) for the audit. No read receipt was received. VPS contacted its USF Administrator to inquire if there were any other email addresses available. On both July 29th and August 2nd, VPS resent the email to compliance@niceincontact.com and kmh@compliancegroup.com. On August 2nd, VPS received an email stating "Delivery of your message to kmh@compliancegroup.com failed permanently."

3. On August 6, 2021, VPS attempted to contact the via Company phone, leaving a voicemail. inContact emailed VPS on August 6th providing the appropriate contact for the audit.

4. On August 9, 2021, VPS sent an introductory letter, an initial audit questionnaire, and a request for KUSF related documentation (Audit Packet) via e-mail to inContact's POC. The due date for the requested information was August 20, 2021.

5. On August 18, 2021, the Company requested an extension of time to respond to DRs 1-15. VPS advised inContact that the Company would need to respond to DR 1 and submit a formal request outlining the nature of the extension. inContact provided the requested information on August 19, 2021.

6. VPS granted an extension to DRs 2-15 until August 31, 2021.

7. inContact provided responses to DRs 2-15 by August 30, 2021.

8. On September 16, 2021, VPS contacted the Company advising that an on-site visit was required, and VPS was needing to ascertain whether inContact's primary contact was available to conduct the on-site visit in person or if they were currently still working remotely, due to the COVID-19 Pandemic. On September 20, 2021, inContact advised that an on-site visit would be problematic due to its accounting and tax personnel folks still working remotely for the foreseeable future.

9. On October 1, VPS issued additional DRs 16-18 with a due date of October 12, 2021. On October 12th, inContact provided a response to DR 18, but requested an extension for DRs 16 and 17, due to additional time required to do research and the Company involved in its month-end close process. VPS granted an extension until October 21, 2021. inContact responded to DRs 16 and 17 on October 20, 2021.

10. During the months of October 2021 and February 2022, VPS conducted testing and worked on completing the audit program. As necessary, VPS reached out to the Company to inquire on items that needed clarification.

11. On February 9, 2022, VPS issued DR 19 with a due date of February 18, 2022. inContact responded to DR 19 on February 16, 2022.

12. On March 17, 2022, VPS emailed a list of Discussion Items for the remote site-visit and requested the Company's availability for a Microsoft Teams meeting. VPS again emailed the Company on April 1, 2022, requesting the Company's availability. On May 4, 2022, VPS emailed another POC requesting the Company's availability.

13. On May 4, 2022, VPS emailed Kansas Corporation Commission Staff (KCC) stating VPS reached out several times to the Company and received no response and inquiring if the KCC had any additional POCs. The KCC provided two (2) additional contacts. VPS emailed the additional contacts requesting availability for a Teams meeting to conduct the remote site-visit. The Company responded on May 12, 2022, providing their availability. The site visit was held on May 19, 2022.

14. On May 13, 2022, VPS issued an additional DR 20 with a due date of May 24, 2022.

15. On May 17, 2022, VPS issued an additional DR 21 with a due date of May 26, 2022.

16. On May 24, 2022, inContact responded to DR 20. However, the request was incomplete, as the Company did not actually confirm that the statements were true. VPS emailed the POCs informing them that the response to DR 20 was incomplete and advised that the Company should provide a confirmatory response to each of the

individual statements. VPS emailed the Company again on June 10th and June 20th, 2022, inquiring as to the status of the response to DR 20, so that VPS can proceed with finalizing the audit report. inContact provided a response to DR 20 on June 20, 2022.

17. On May 24, 2022, the Company requested an extension to June 3rd to respond to DR 21, which was granted. A response to DR 21 was provided on June 1, 2022.

18. On June 23, 2022, VPS submitted a draft Audit Report to the Company for review and/or comment, requesting it to reply by July 8, 2022, as to whether the Company agreed with the Audit Report or if it had comments to add to the report.

19. The Commission's Audit Review Procedures allow inContact the opportunity to review the draft Audit Report and provide a response from management. As a result, in order to allow VPS time to perform the appropriate review and evaluation of the additional data and allow inContact time to review the draft audit report and provide a management response, additional time beyond the current June 30, 2022, deadline is necessary.

20. VPS recommends and requests that the Commission extend the deadline for VPS to complete and file its audit report from June 30, 2022, to July 20, 2022. The additional time will allow VPS to finalize its review of inContact's information and submit its audit report to the Commission.

21. Therefore, for the reasons set forth above, VPS requests this Extension of Time be granted.

Vantage Point Solutions,

By: 
Julie Darrington
VP of Consulting

VERIFICATION

STATE OF South Dakota)
) ss
COUNTY OF Davison)

Julie Darrington, of lawful age being first duly sworn upon oath states:

That she is the VP of Consulting of Vantage Point Solutions, Inc. in this matter; that she has read and is familiar with the foregoing Motion and that the statements made therein are true and correct to the best of her information, knowledge and belief.

Julie Darrington
Julie Darrington
VP of Consulting

Subscribed and sworn to before me 27th day of June, 2022.

Sheila Hill
Notary Public



Comm. 5507 expires June 16, 2026