

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Audit of USCOC of Nebraska/)
Kansas LLC by the Kansas Universal Service Fund)
(KUSF) Administrator Pursuant to K.S.A. 66-2010(b)) Docket No. 24-USCZ-106-KSF
for KUSF Operating Year 26, Fiscal Year)
March 2022-February 2023.)

PETITION FOR RECONSIDERATION

COMES NOW USCOC of Nebraska/Kansas, LLC (“U.S. Cellular”) and petitions the Kansas Corporation Commission (“Commission”) for reconsideration of the deadlines set forth in its May 21, 2024 Order Adopting Audit Report (“Order”) pursuant to K.S.A 77-529(a)(1).

1. Pursuant to the Commission’s August 15, 2023 Order to Commence Audit, at paragraph 7, U.S. Cellular assembled all information requested by Vantage Point Solutions (“VPS”) so that VPS may timely complete and file its Audit Report with the Commission.

2. VPS’s April 25, 2024 Audit Report makes the recommendations that the Commission recites at paragraph 3 of its Order. That Audit Report further notes that U.S. Cellular agrees with the findings made therein, that U.S. Cellular is “currently implementing” VPS’s recommendations, and that U.S. Cellular “will be prepared to complete the steps” that VPS has recommended. Audit Report at 4.

3. However, the Audit Report also notes that U.S. Cellular reported to VPS that “more than 60 days will be needed to process the changes in the billing system and issuing of the refunds.” *Id.*

4. While U.S. Cellular promptly initiated the process of making VPS’s recommended changes upon issuance of the Audit Report, the fact remains that it will be unable to process the recommended changes in its billing system and to issue the required refunds within 60 days of the Commission’s May 21, 2024 Order.

5. Billing system changes, and any refunds that ensue, require a substantial amount

of time to fully implement. The next billing system release in which U.S. Cellular would be able to make the required updates is not until the end of August, a system limitation that prevents U.S. Cellular from updating the system until that time. Furthermore, issuance of credits cannot occur until the billing system is updated, and credits are then manually processed – the processing of credits is not a systematic process – in waves due to the limit to the number of credits that can be uploaded per billing cycle.

6. Accordingly, while U.S. Cellular will, within 60 days of the Commission’s May 21, 2024 Order, file audit true-ups for FYs 25, 26, and 27 to exclude its international calling usage revenues from its reporting and update its KUSF reporting procedures to exclude reporting of international calling usage revenues, it requires 180 days to:

- a. Issue one-time billing credits in the amount of \$2,236.20 to its affected customers, on a pro-rata basis;
- b. Update its billing system to exclude KUSF surcharge collection from international calling usage revenues;
- c. Provide VPS with ten (10) customer bills supporting that the refund process has been completed;
- d. File an affidavit, signed by an officer of the Company, attesting that the Company: corrected its KUSF reporting procedures to exclude international calling usage revenues from its reporting revenues; corrected its billing system to exclude KUSF surcharge collection from international calling usage revenues; and issued refunds through one-time billing credits, totaling \$2,236.20, to its affected customers, on a pro-rata basis.

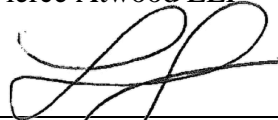
7. U.S. Cellular therefore petitions the Commission for reconsideration of its 60-day deadline for the above-enumerated tasks set forth in paragraph 5 and ordered paragraph A of its Order. U.S. Cellular anticipates it will complete these tasks no later than November 18, 2024. U.S. Cellular posits that it is logical for VPS to also be granted an extension of its 90-day

Compliance Report to 30 days after that November 18, 2024 deadline (i.e., until December 18, 2024).

WHEREFORE U.S. Cellular respectfully petitions this Commission for reconsideration of the 60-day deadline set forth in its May 21, 2024 Order Adopting Audit Report and requests that the Commission order U.S. Cellular to (1) issue the required one-time billing credits; (2) update its billing system as required; (3) provide VPS with ten (10) customer bills as required; and (4) file the required affidavit no later than November 18, 2024. VPS's Compliance Report would accordingly be due by December 18, 2024.

Respectfully submitted,

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VERIFICATION

STATE OF MAINE)
) ss:
COUNTY OF CUMBERLAND)

I, Lisa A. Gilbreath, verify under penalty of perjury under the laws of the state of Kansas that I am an attorney for U.S. Cellular, and that the foregoing Petition for Reconsideration is true and correct to the best of my knowledge and information. Executed on June 4, 2024.



Lisa A. Gilbreath

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Petition for Reconsideration was served via electronic service this June 4, 2024, to the parties appearing on the Commission's service list (last modified May 16, 2024).

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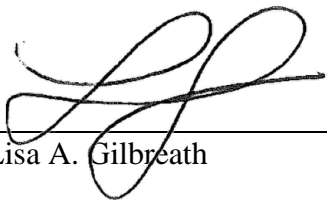
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