



May 1, 2019

Ms. Lynn Retz
Secretary of the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

RE: Docket No. 16-GIMT-511-GIT
CenturyLink's Updated Compliance Filing on CAF II and KUSF Support
Consistent with the Commission's December 12, 2017 Order

Dear Ms. Retz:

In its May 24, 2016 Opening Order, the Commission directed CenturyLink in Ordering Paragraph A to file (A) its proposed model, (B) its revised CAF II support, (C) the 2015 enabled locations reported to the FCC, and (D) its preliminary 2016 enabled data by July 1, 2016. CenturyLink made the required compliance filing on June 30, 2016 and labeled the individual elements of its filing as Attachment A, B, C and D, respectively. On August 16, 2016, after ongoing discussions with Staff, CenturyLink filed with the Commission a slightly revised Attachment A and Attachment B.

On August 22, 2016, Staff filed its Report and Recommendation which recommended the Commission (1) adopt CenturyLink's August 16, 2016 model, (2) adopt true-ups and adjustments proposed by Staff and (3) adopt a bi-annual CAF II and KUSF support true-up process. The Commission accepted Staff's recommendation in an Order dated October 10, 2016 and further directed CenturyLink to file an updated CAF II model, reflecting 2016 enabled locations and preliminary 2017 enabled locations, and CAF II support offset by May 1, 2017. On May 1, 2017, CenturyLink made the required filing. On December 6, 2017, Staff filed its Report and Recommendation.

On December 12, 2017, the Commission issued its Order modifying CenturyLink's KUSF support for the following six months and directing CenturyLink to file its updated CAF II model and KUSF support calculations, and household location data within exchanges where it has enabled broadband services no later than May 31, 2018. CenturyLink made this filing on May 1, 2018.

Although the Commission has not set a similar deadline for a 2019 data submission in an Order, consistent with the established schedule as agreed upon by Staff, CenturyLink makes this filing which includes the following attachments:

- Attachment A & C combined: A) CenturyLink's revised proposed model to reflect 2018 CAF II enabled locations AND C) Detailed location data for the 16,756 enabled locations CenturyLink has enabled under CAF II (labeled "CAF 2 Completed" tab in the Excel spreadsheet).

It should also be noted that the "adjustment location factor" proposed by CenturyLink and approved by the Commission in its October 10, 2016 Order (Para. 8) has been removed from the model for the 2017 and 2018 enabled census blocks as further directed by the Commission in its Order (Para. 9).

The United Telephone Companies of Kansas d/b/a CenturyLink considers Attachment A and C to be confidential and of commercial value, and it has not been made public. The file also contains location data which could be valuable to a competitor in evaluating or formulating different strategies for the Kansas market. This document is filed pursuant to K.S.A. 66-1220a, and CenturyLink asks the Commission to treat this document as confidential and exempt from public disclosure under that statute. A redacted copy has been filed publically.

- Attachment B – CenturyLink's revised KUSF Support. CenturyLink's revised KUSF support figure is the result of the model in Attachment A. The revised KUSF support amount differs by -\$47,236 (or -\$3,936 monthly) from the previous model as a result of 2018 enabled locations. CenturyLink considers Attachment B to be public data.

Finally, as directed by the Commission in its Order dated October 10, 2016, (Para. 11), CenturyLink and Staff continue their on-going cooperative efforts to identify and resolve any potential location discrepancies. While these isolated location discrepancies are common in the industry and could potentially impact the amount of KUSF support, this verification initiative is unrelated to the CAF program or the CAF offset.

If you have any questions concerning this matter, please contact me.

Yours appreciatively,



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Docket No. 16-GIMT-511-GIT
CenturyLink's Compliance Filing on CAF II and KUSF Support

SUBMITTED PURSUANT TO
K.S.A. 66-1220A

United Telephone Companies of Kansas
d/b/a/ CenturyLink

Attachment A & C
KUSF/CAF Model – See Separate Excel File

This Attachment contains confidential and of commercial value, and it has not been made public
as described in the cover letter

CONFIDENTIAL AND PROPRIETARY

Company: CenturyLink of Kansas

Wire Center	As of September 30, 2018						KUSF / CAF2 Overlap															Zone1 KUSF Reduction	Zone 2 KUSF Reduction	Total KUSF Reduction
	ZONE 1			ZONE 2			Zone 1								Zone 2									
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2	Total KUSF Needed in WC after CAF2 Overlap	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2			
Alta Vista	\$	18.19		\$	100.01		7								55									
Altoona	\$	21.80		\$	91.96		19								27									
Belle Plaine	\$	-		\$	31.13		-								-									
Benedict	\$	-		\$	117.03		15								6									
Blue Mound	\$	40.47		\$	114.80		24								23									
Bucyrus	\$	-		\$	39.07		11								327									
Buffalo	\$	-		\$	70.97		19								16									
Centropolis	\$	-		\$	69.73		10								113									
Circleville	\$	34.46		\$	90.67		-								59									
Conway	\$	-		\$	98.49		-								3									
Coyville	\$	-		\$	88.71		9								4									
Delia	\$	-		\$	84.53		-								22									
Denison	\$	29.99		\$	84.00		1								66									
Durham	\$	-		\$	103.19		33								21									
Easton	\$	7.74		\$	43.71		1								207									
Edgerton	\$	-		\$	21.98		7								182									
Effingham	\$	4.01		\$	59.56		4								59									
Emmett	\$	39.17		\$	93.49		-								48									
Fall River	\$	-		\$	68.10		1								31									
Fontana	\$	-		\$	47.58		4								153									
Gardner	\$	-		\$	3.08		41								819									
Greeley	\$	8.04		\$	66.26		2								45									
Gridley	\$	14.80		\$	109.86		3								16									
Harveyville	\$	24.75		\$	82.47		1								61									
Hesston	\$	-		\$	17.30		-								-									
Hoyt	\$	5.81		\$	45.96		-								99									
Inman	\$	-		\$	42.76		-								123									
Lafontaine	\$	-		\$	125.45		3								6									
Lancaster	\$	4.09		\$	51.05		3								26									
Lane	\$	-		\$	32.96		-								130									
Lebo	\$	2.99		\$	77.37		-								83									
Lehigh	\$	41.68		\$	117.10		8								10									
Le Roy	\$	17.48		\$	111.73		8								13									
Linwood	\$	8.12		\$	29.30		5								314									
Mapleton	\$	-		\$	93.54		13								43									
Mayetta	\$	16.87		\$	51.20		-								145									
Mc Louth	\$	3.77		\$	50.21		-								248									
Meriden	\$	1.17		\$	28.18		-								331									
Michigan Valley	\$	-		\$	86.39		4								44									
Mound City	\$	1.71		\$	53.47		2								129									
Neosho Falls	\$	-		\$	93.55		33								4									
Nortonville	\$	5.83		\$	57.07		-								126									
Osage City	\$	-		\$	37.89		9								44									
Overbrook	\$	1.30		\$	54.24		3								123									
Oxford	\$	-		\$	49.26		-								-									
Ozawkie	\$	7.56		\$	38.45		-								77									
Parker	\$	12.16		\$	67.36		4								118									
Perry	\$	0.15		\$	36.68		-								213									
Piqua	\$	-		\$	117.23		19								3									
Princeton	\$	8.28		\$	67.05		2								51									
Quincy	\$	-		\$	243.23		1								4									
Richmond	\$	9.84		\$	69.69		-								85									
Rossville	\$	-		\$	45.52		-								119									
Silver Lake	\$	-		\$	27.20		-								343									
Spring Hill	\$	0.41		\$	21.46		6								531									
Saint Marys	\$	-		\$	15.95		24								135									
Thayer	\$	11.90		\$	75.96		1								96									
Toronto	\$	14.09		\$	80.33		1								41									
Walton	\$	12.47		\$	70.57		-								-									
Wellsville	\$	-		\$	41.21		3								369									
Winchester	\$	1.11		\$	60.84		-								24									
Windom	\$	-		\$	60.58		14								2									
Abbyville	\$	-		\$	59.22		-								2									
Alden	\$	27.44		\$	45.06		2								13									
Arlington	\$	10.55		\$	71.51		-								-									
Belpre	\$	-		\$	72.04		13								5									
Claffin	\$	6.34		\$	75.04		-								6									
Cunningham	\$	15.68		\$	109.55		5								13									
Hoisington	\$	-		\$	49.76		-								-									
Hudson	\$	-		\$	57.73		3								18									
Langdon	\$	-		\$	67.61		7								1									
Macksville	\$	-		\$	43.76		3								5									

Company: CenturyLink of Kansas

Wire Center	As of September 30, 2018						KUSF / CAF2 Overlap															Zone1 KUSF Reduction	Zone 2 KUSF Reduction	Total KUSF Reduction	
	ZONE 1			ZONE 2			Zone 1								Zone 2										
	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Total Supported Lines	Per Line Support (Monthly)	KUSF Support (Annual)	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2	Total KUSF Needed in WC after CAF2 Overlap	Lines in CAF2 CB	Assigned CAF2 Funded Locations	Adjusted CAF2 Funded Locations	Assigned CAF2 Funding	KUSF in CAF2 CB	KUSF in nonCAF2 Areas	Total Funding where KUSF Exceeds CAF2				Total KUSF Needed in WC after CAF2 Overlap
Murdock		\$ -			\$ 92.68		-								-										
Partridge		\$ 13.29			\$ 64.25		-								-										
Preston		\$ -			\$ 87.12		13								5										
Pretty Prairie		\$ 9.13			\$ 70.83		-								3										
Saint John		\$ 0.42			\$ 73.11		9								7										
Sterling		\$ -			\$ 33.26		-								19										
Sylvia		\$ -			\$ 48.80		4								13										
Riverton		\$ 5.38			\$ 36.70		34								142										
Scammon		\$ 2.06			\$ 28.18		7								25										
Alma		\$ -			\$ 63.41		2								107										
Altamont		\$ 0.82			\$ 57.60		10								26										
Baldwin		\$ -			\$ 20.81		-								522										
Buhler		\$ -			\$ 26.31		-								70										
Burlingame		\$ -			\$ 27.66		3								64										
Burlington		\$ -			\$ 32.11		-								62										
Burrton		\$ 9.41			\$ 82.62		-								-										
Ellinwood		\$ -			\$ 37.54		-								-										
Eskridge		\$ -			\$ 95.25		1								104										
Fredonia		\$ -			\$ 4.78		4								63										
Garnett		\$ -			\$ 21.33		23								94										
Haven		\$ -			\$ 9.16		-								1										
Highland		\$ -			\$ 21.49		-								33										
Hillsboro		\$ -			\$ 13.26		27								22										
Kincaid		\$ -			\$ 54.52		5								25										
Lyndon		\$ -			\$ 28.81		-								149										
Melvorn		\$ -			\$ 60.74		7								62										
Moran		\$ 7.46			\$ 72.61		3								29										
Morrill		\$ -			\$ 36.76		5								25										
Mound Valley		\$ 15.01			\$ 78.78		1								12										
Oskaloosa		\$ -			\$ 26.07		1								230										
Oswego		\$ -			\$ 24.81		52								60										
Pomona		\$ -			\$ 28.28		8								94										
Powhattan		\$ -			\$ 51.81		3								26										
Quenemo		\$ -			\$ 111.32		15								11										
Troy		\$ -			\$ 45.65		1								98										
Valley Falls		\$ -			\$ 26.42		-								95										
Wathena		\$ 2.68			\$ 45.16		-								160										
Waverly		\$ 1.12			\$ 84.23		21								22										
Westphalia		\$ -			\$ 75.84		18								22										
White Cloud		\$ 14.45			\$ 69.22		39								15										
Subtotal	5,795		538,161	19,402		9,910,220	727	977	478	\$ 607,587	\$ 38,953	\$ 499,209	\$ 14,449	\$ 513,658	9,195	19,320	6,477	\$ 10,800,190	\$ 4,394,242	\$ 5,515,978	\$ 2,145,527	\$ 7,661,505	\$ 24,504	\$ 2,248,716	\$ 2,273,219
Total Company				25,197		\$ 10,448,382									9,922	20,298	6,954	\$ 11,407,777	\$ 4,433,195	\$ 6,015,187	\$ 2,159,976	\$ 8,175,162			

Calculation of CenturyLink's Revised KUSF Year#23 Support Amount Resulting From Changed Federal Offset

	Year23 Approved (1)		Year23 Revised Proposal (2)	Difference
Gross High Cost	\$ 10,448,382	➡	\$ 10,448,382	\$ -
Federal Offset	\$ (2,225,984)	from model	\$ (2,273,219)	\$ (47,235)
NET HIGH COST	\$ 8,222,398		\$ 8,175,163	\$ (47,235)
Gross Access	\$ 575,519	➡	\$ 575,519	\$ -
Access True up	\$ (357,269)	➡	\$ (357,269)	\$ -
NET ACCESS	\$ 218,250		\$ 218,250	\$ -
KUSF Adjustment/Rounding	\$ 1	➡	\$ -	\$ (1)
Qualifying KUSF	\$ 8,440,649		\$ 8,393,413	\$ (47,236)
Statutory KUS Cap	\$ 11,400,000		\$ 11,400,000	
Total KUSF	\$ 8,440,649		\$ 8,393,413	\$ (47,236)

Notes:

(1) Year23 approved amounts from Docket No. 19-GIMT-056-GIT for 6 months until revised model available
Amounts taken from Attachment B pages 1 and 4 from Reams's Direct Testimony filed 12/14/2018

(2) KCC Order in Dkt No. 16-511 dated December 12, 2017 directed CenturyLink to file its revised KUSF support amount on May 31, 2018 with 2018 results filed on May 1, 2018. No such procedural schedule has been established in a docket for 2019 although CenturyLink submits the 2019 updated data based on the schedule agreed upon with Staff.
Federal offset amount taken from AI-118 from May 1st 2019 KUSF/CAF Model summary page