

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

Received
on

MAY 11 2012

**In the Matter of a General Investigation to)
Determine the Assessment Rate for the)
Sixteenth Year of the Kansas Universal)
Service Fund Effective March 1, 2012.)**

by
State Corporation Commission
of Kansas
Docket No. 12-GIMT-168-GIT

**VERIZON WIRELESS' MOTION AND UPDATE
ON USE OF INTRASTATE ALLOCATION METHODOLOGY**

WWC License LLC respectfully moves the Commission to approve its use of a company-specific traffic report for purposes of calculating its assessments payable to the Kansas Universal Service Fund ("KUSF"), and Verizon Wireless (VAW) LLC, Topeka Cellular Telephone Company, Inc., and Alltel Communications, LLC respectfully provide the Commission with this update of their continued use of a company-specific traffic report for KUSF assessment purposes. These four Verizon Wireless affiliates are collectively referred to as "Verizon Wireless."

1. In support hereof, Verizon Wireless files the accompanying affidavit of Robert W. Mutzenback, Director – Regulatory Compliance at Verizon.

2. As explained in more detail in Mr. Mutzenback's affidavit, Verizon Wireless utilizes a company-specific traffic report that relies on actual minutes of use ("MOU") data for both Federal Universal Service Fund ("FUSF") and KUSF purposes, using the inverse of the federal percentage derived from the report to determine the appropriate percentage for KUSF reporting and remittance purposes. WWC License LLC began using this methodology after the July 11, 2009 conversion of its billing systems to those used by Verizon Wireless.¹ The

¹ As with the Alltel entities that were the subject of the Commission's April 27, 2012 "Order Approving Traffic Factors and Assessing a Penalty" in Docket No. 11-GIMT-201-GIT ("*Alltel Order*"), it appears that WWC License

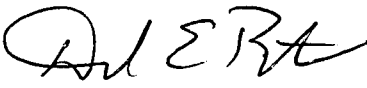
remaining Verizon Wireless affiliates have continued to use this previously-approved approach since 2009, and provide updated factors in conjunction with this submission.²

3. Because the traffic report contains proprietary and confidential trade secret actual MOU data, the factors developed using it are being filed under seal.

WHEREFORE, Verizon Wireless respectfully moves the Commission for an order approving WWC License LLC's use of a company-specific traffic report and the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and respectfully updates the Commission regarding the traffic factors utilized by Verizon Wireless (VAW) LLC, Topeka Cellular Telephone Company, Inc., and Alltel Communications, LLC.

Respectfully submitted,

Dated: May 10, 2012

By 

David Bengtson (#12184)
Stinson Morrison Hecker LLP
1625 N. Waterfront Parkway, Suite 300
Wichita, KS 67206-6620
Direct: (316) 268-7943
Fax: (316) 268-9798
DBengtson@stinson.com

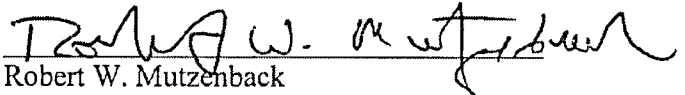
*Counsel for Verizon Wireless (VAW) LLC,
Topeka Cellular Telephone Company, Inc.,
and Alltel Communications, LLC*

LLC inadvertently neglected to notify the Commission of this change upon the conversion of its billing systems following its acquisition by Verizon Wireless.


² Verizon Wireless (VAW) LLC and Topeka Cellular Telephone Company, Inc. filed their previous update on September 3, 2009 in Docket 09-TCTZ-125-KSF. The last update for Alltel Communications LLC was filed on April 13, 2012 in Docket 11-GIMT-201-GIT. In the *Alltel Order*, the Commission approved Alltel Communications LLC's traffic factors through February 2012; the instant submission confirms that the traffic factor in use as of that point remains in effect today.

VERIFICATION

I, Robert W. Mutzenback, being of lawful age and duly sworn, state that I have read the above and foregoing Motion and verify that the statements contained therein are true and correct to the best of my knowledge and belief.


Robert W. Mutzenback

Subscribed and sworn to before me this 9th day of May, 2012.



Notary Public

HUNG TANG CHI
Notary Public, State of New York
No. 6071922
Qualified in Queens County
Commission Expires 3/25/2014

My Commission Expires:

CERTIFICATE OF SERVICE

The undersigned certifies that on this 10th day of May, 2012, a true and correct copy of the foregoing was sent by U.S. Mail, postage prepaid, and properly addressed to the following:

BRUCE A. NEY, GENERAL ATTORNEY
AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.
220 SE 6TH AVE STE 515
TOPEKA, KS 66603-3507

C. STEVEN RARRICK, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604

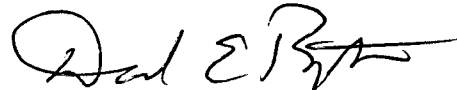
MARY KATHRYN KUNC, ATTORNEY
COMINGDEER LEE & GOOCH
6011 N. ROBINSON AVENUE
OKLAHOMA CITY, OK 73118

ROBERT A. FOX, SENIOR LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027

MARK E. CAPLINGER
MARK E. CAPLINGER, P.A.
7936 SW INDIAN WOODS PL
TOPEKA, KS 66615-1421

SUSAN B. CUNNINGHAM, COUNSEL
SNR DENTON US LLP
7028 SW 69TH ST
AUBURN, KS 66402-9421

TORRY SOMERS, ATTORNEY AT LAW/NVLSVBO207
UNITED TELEPHONE CO. OF KANSAS D/B/A CENTURYLINK
6700 VIA AUSTI PKWY
LAS VEGAS, NV 89119



David E. Bengtson

3. Verizon Wireless uses the inverse of the federal percentage derived therewith to calculate the percentage for KUSF reporting purposes ($100\% - \text{FUSF \%} = \text{KUSF \%}$). This approach provides a fair and balanced symmetry between federal and state USF programs, and complies with the Commission's directive that carriers use the same allocation methodology for FUSF and KUSF purposes.

4. Verizon Wireless applies the KUSF percentage to its Kansas retail revenues to determine the amount it remits to the KUSF.

5. Verizon Wireless has used, and continues to use, the same methodology described herein at all times since 2009.

6. The intrastate factors used by Verizon Wireless for KUSF purposes for the KUSF reporting period from 2009 through the present are set forth on the confidential and proprietary attachment to my affidavit.

7. Because the intrastate factors are derived from proprietary and confidential trade secret actual MOU data, the attachment to my affidavit is being filed under seal.

Pursuant to Kan. Stat. Ann. 53-601, I certify that the foregoing is true and correct to the best of my knowledge.

Robert W. Mutzenback
Robert W. Mutzenback

Subscribed and sworn to before me this 9th day of May, 2012.

Hung Tang Chi
Notary Public

HUNG TANG CHI
Notary Public, State of New York
No. 6071922
Qualified in Queens County
Commission Expires 3/25/2014

My Commission Expires:



**STINSON
MORRISON
HECKER**
LLP

David E. Bengtson
316.268.7943 DIRECT
316.268.9798 DIRECT FAX
dbengtson@stinson.com

May 10, 2012

Via Federal Express

Patrice Petersen-Klein, Executive Director
Kansas Corporation Commission
Attn: Docket Room
1500 S.W. Arrowhead Rd.
Topeka, KS 66604-4027

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State Corporation Commission
of Kansas

Re: In the Matter of the General Investigation to Determine the
Assessment Rate for the Sixteenth Year of the Kansas Universal
Service Fund Effective March 1, 2012

Docket No. 12-GIMT-168-GIT

Dear Ms. Petersen-Klein:

Enclosed herewith for filing in the above-captioned matter, please find the original and seven (7) copies of Verizon Wireless' Motion and Update on Use of Intrastate Allocation Methodology and the Affidavit of Robert W. Mutzenback.

Please note that the public version of the Affidavit of Robert W. Mutzenback is attached to motion being filed, and there is also a confidential version of that affidavit which is enclosed herein in a sealed envelope. **Pursuant to K.S.A. 66-1220a and K.A.R. 82-1-221a, Verizon hereby requests confidential treatment of the affidavit filed herewith under seal.**

The data contained in the confidential affidavit includes competitively sensitive commercial information that would not otherwise be made public in the ordinary course of business. Disclosure of this confidential commercial information would be of significant competitive use to Verizon's competitors. Public dissemination would thus substantially prejudice Verizon and place the company at a competitive disadvantage.

In addition, public dissemination of the confidential commercial information will not aid the Commission in fulfilling its functions or materially benefit the public. Accordingly, the Commission previously granted confidential treatment to this type of data. Verizon therefore respectfully requests that the Commission afford the confidential version of that affidavit confidential treatment and maintain the information under seal.

One of the copies of the filing submitted herewith is an extra copy that I request be filed-stamped and returned to me in the enclosed self-addressed, stamped envelope.

Thank you for your courtesy in this matter. Please contact me should you have any questions.

Very truly yours,

STINSON MORRISON HECKER LLP

A handwritten signature in black ink, appearing to read "David E. Bengtson". The signature is stylized with a large initial "D" and a long, sweeping underline.

David E. Bengtson

DEB:kla

Enclosures

cc: Elaine Critides
Deborah Kuhn