

**Mark E. Caplinger, P.A.**

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June 14, 2022

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

Re: Docket 22-GIMT-455-GIT

Dear Ms. Retz,

Enclosed is the FCC Section 254(e) certification for Federal Universal Service Support in the above referenced docket for Cellular Network Partnership d/b/a Pioneer Cellular (CNP).

We are filing Attachments 3a and 4 proprietary and confidential under seal. Cellular Network Partnership believes that the information contained in Attachments 3a and 4 is of such competitive sensitivity that its disclosure to any person other than CNP, the Commission, and Staff is prohibited by K.S.A. 66-1220(a). Disclosure of trade secrets and confidential information to any person, including parties to this proceeding, is prohibited unless the Commission finds the disclosure is warranted, after considering all of the factors in that statute. The carrier believes that disclosure of the information contained in Attachments 3a and 4 would have a significant and adverse impact on its competitive stance regarding existing or potential competing entities including wireless carriers, competitive local exchange carriers, and incumbent local exchange carriers. Regulatorily mandated disclosure of any or all of the subject information would create a competitive bias in favor of any actual or potential competitor not required to provide comparable information, reducing or eliminating any benefit to consumers otherwise resulting from unbiased competition and damaging the submitting company's ability to engage in fair competition.

Very truly yours,

*Nancy McKenzie* Ad. Asst.  
*for*

Mark E. Caplinger  
Attorney for Cellular  
Network Partnership  
dba Pioneer Cellular

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Dwight D. Keen, Chair  
Susan K. Duffy, Commissioner  
Andrew J. French, Commissioner

In the Matter of Certification of Compliance )  
with Section 254(e) of the Federal )  
Telecommunications Act of 1996 and ) Docket No. 22-GIMT-455-GIT  
Certification of Appropriate Use of Kansas )  
Universal Service Fund Support. )

SECTION 254(e) CERTIFICATION  
FEDERAL HIGH-COST UNIVERSAL SERVICE SUPPORT  
FCC Docket Reference: CC Docket No. 96-45  
and KANSAS UNIVERSAL SERVICE FUND SUPPORT  
(Please type or print legibly)  
**(Circle all Federal and Kansas Support Received)**

1. My title is General Manager of  
Cellular Network Partnership (Company/Cooperative). In this capacity, I am in a position  
of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-  
cost Loop support (HCL/FHCS) Safety Valve support (SVS), Connect America Cost Model (CACM)  
support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-  
CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund  
(RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this  
certification I am binding Cellular Network Partnership (Company/Cooperative) to the statements  
made in this certification.

2. Cellular Network Partnership (Company/Cooperative) was named as  
an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal  
support purposes in Docket No. 06-CNPZ-1028-ETC Tele-Cell by order dated  
November 21, 2006 and KUSF support purposes in Docket No. N/A by order  
dated N/A.

Docket No. 22-GIMT-455-GIT  
Attachment 1

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CACM, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by Cellular Network Partnership (Company/Cooperative) was used in the proceeding calendar year 2021 and will be used in the new calendar year 2023 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal Telecommunications Act, and/or Kansas statutes and KCC requirements.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

(Pursuant to Kan. Stat. Ann. 53-601.)

  
Signature

Richard Ruhl  
Printed/Typed Name

Executed on 6/13/2022 date.

Email address: raruhl@ptci.com



Annual ETC Certification of Requirements Imposed by the  
Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 4.5, of at least 30 minutes in duration for each service area in which an Eligible Telecommunications Carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 C.F.R. § 4.5(e)?  
**(Yes/No) No . IF YES, PLEASE COMPLETE THE FOLLOWING:**

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

There were no unfilled requests for service in 2021.

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

There were no complaints filed in 2021.

4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. Please complete the following, as applicable to your company:

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is \_\_\_\_\_ of the \_\_\_\_\_ (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding \_\_\_\_\_ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that \_\_\_\_\_ (Company/ Cooperative) is in compliance with the Commission's quality of service standards as adopted in Docket No. 191.206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_ (date).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed/Typed Name

**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is General Manager of the Cellular Network Partnership (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding Cellular Network Partnership (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cellular Network Partnership (Company/ Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6/13/2022 (date).

  
Signature

Richard Ruhl

Print / Typed Name



5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 54.202(a)(2).

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**  
**KCC Docket Reference: 06-GIMT-446-GIT**  
(Please type or print legibly)

1. My title is General Manager of the Cellular Network Partnership (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding Cellular Network Partnership (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cellular Network Partnership (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6/13/2022 (date).



Signature

Richard Ruhl

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline services) throughout the service area for which it has been designated "using media of general distribution." Please complete the following:

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Anthony Republican	Newspaper	Southern Kansas	March 2021
Attica Independent	Newspaper	Southern Kansas	March 2021
Caldwell Messenger	Newspaper	Southern Kansas	March 2021
Harper Advocate	Newspaper	Southern Kansas	March 2021
Gyp Hill Premiere	Newspaper	Southern Kansas	March 2021

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent LEC. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent LEC and complete the certification.

Basic Plan \$30 per month
Nationwide Coverage
Unlimited Talk
Unlimited Texts

**COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is General Manager of the Cellular Network Partnership (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding Cellular Network Partnership (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Cellular Network Partnership (Company/ Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6/13/2022 (date).



Signature

Richard Ruhl

Printed/Typed Name