

COLLEEN R. JAMISON
JAMISON LAW, LLC

June 25, 2024

Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604

RE: S&T Telephone Cooperative Assoc., Inc.
Docket No. 24-GIMT-612-GIT
254(e) certifications

Dear Ms. Retz:

On behalf of S&T Telephone Cooperative Assoc., Inc., attached please find for filing in Docket No. 24-GIMT-612-GIT the 254(e) certifications required by the Commission to be filed in this docket by June 28, 2024 (Attachments 1, 2a, 4, and 5).

In this filing, the entirety of Attachments 2a and 4 have been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket.

Please let me know if you have any questions.

Cordially yours,

Colleen R. Jamison

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JAMISON LAW, LLC

Encl.

cc: Zack Odell
Christina Hickert

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 24-GIMT-612-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 CEO of S&T Telephone Cooperative Association (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 S&T Telephone Cooperative Association (Cooperative) to the statements made in this certification.

2. S&T Telephone Cooperative Association (Cooperative) was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997 and KUSF support purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by S&T Telephone Cooperative

**Docket No. 24-GIMT-612-GIT
Attachment 1**

Association (Cooperative) was used in the proceeding calendar year 2023 and will be used in the new calendar year 2025 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.)

Zack Odell

Signature

Zack Odell
Printed/Typed Name

Executed on 06/14/2024 date.

Email address: zack.odell@sttelcom.com

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2023

	REGULATED AMOUNT
WORKING LOOPS	
1. Total Loops	
2. Category 1.3 Loops	
3. Consumer Broadband-only Loops	
INVESTMENT** Remove all BLS only investments	
1. Plant Accounts	
a. Acct 2001 - Telephone Plant in Service	
2. Selected Plant Accounts	
a. Acct 2210 - Central Office Switching	
b. Acct 2220 - Operator System Equipment	
c. Acct 2230 - Central Office Transmission	
d. Total Central Office Equip	
e. Circuit Equip Cat 4.13	
f. Acct 2410 - Cable & Wire Facilities Total	
AMORTIZABLE TANGIBLE ASSETS	
Acct. 2680 - Tangible Assets	
Acct. 2680 (2230) - Central Office Transmission	
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	
Acct. 2680 (2410) Cable & Wire Facilities	
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	
Acct. 6560 (2680) Dep & Amort	
PART 36 - COST STUDY DATA	
1. Acct. 2410 - Cost Study Avg C&WF	
2. Cost Study Avg C&WF Cat 1	
3. C&WF CAT 1 Factor	
4. COE CAT 4.13 Factor	
5. Switching Factor	

For the Following Lines, Use Gross Additions for Plant and Annual Amounts for Expenses for the Test Year

	REGULATED AMOUNT
INVESTMENT, EXPENSE AND TAXES**	
Remove all BLS only amounts	
1. Selected Plant Accounts	
a. Acct 2230 - Central Office Transmission	
b. Total Central Office Equip	
c. Acct 2410 - Cable & Wire Facilities Total	
2. Expenses - Plant Specific Exp	
a. Acct 6110 - Network Support Total	
b. Acct 6110 - Network Support Benefits	
c. Acct 6110 - Network Support Rents	
d. Acct 6120 - General Support Total	
e. Acct 6120 - General Support Benefits	
f. Acct 6120 - General Support Rents	

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2023

- g. Acct 6210 - Central Office Switching Total
 - h. Acct 6210 - Central Office Switching Benefits
 - i. Acct 6210 - Central Office Switching Rents
 - j. Acct 6220 - Operator Systems Total
 - k. Acct 6220 - Operator Systems Benefits
 - l. Acct 6220 - Operator Systems Rents
 - m. Acct 6230 - Central Office Transmission Total
 - n. Acct 6230 - Central Office Transmission Benefits
 - o. Acct 6230 - Central Office Transmission Rents
 - p. Total - Central Office (Acct. 6210 - 6230)**
 - q. Acct 6410 - Cable & Wire Facilities
 - r. Acct 6410 - Cable & Wire Facilities Benefits
 - s. Acct 6410 - Cable & Wire Facilities Rents
 - t. Total Plant Specific Expense (Accts. 6110 - 6410)**
- 3. Expenses - Plant Non Specific Exp
 - a. Acct 6530 - Network Operations
 - b. Acct 6530 - Network Operations Benefits
 - 4. Depreciation & Amortization Exp
 - a. Acct 6560 (#2210) - Central Office Switching
 - b. Acct 6560 (#2220) - Operator Systems
 - c. Acct 6560 (#2230) - Central Office Transmission
 - d. Acct 6560 (#2210-2230) - Total
 - e. Acct 6560 (#2410) - Cable & Wire Facilities
 - 5. Corporate Operating Expenses
 - a. Acct 6710 - Executive & Planning
 - b. Acct 6710 - Executive & Planning Benefits
 - c. Acct 6720 - General Admin
 - d. Acct 6720 - General Admin Benefits
 - e.Total Corporate Operating Expense
(line 535+550)**
 - 6. Other Expenses and Revenues
 - a. Benefits Portion
 - b. Rents Portion
- Total Expenses (Excluding Depreciation)
- 7. Operating Taxes
 - a. Acct 7200

Test for use of FUSF & KUSF

CAPITAL:

- 1. Category 1 C&WF
- 2. Category 4.13 COE and Switching

MAINTENANCE:

- 3. CWF - MAINT. EXP.
- 4. COE - MAINT. SW
- 5. COE - MAINT-OP SYSTEM
- 6. COE - MAINT. - TRANS.

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2023

7. CWF - NETWORK SUPPORT
8. COE - NETWORK SUPPORT

9. CWF GENERAL SUPPORT
10. COE GENERAL SUPPORT

20. CWF NETWORK OPERATION
21. COE NETWORK OPERATION

22. CWF EXEC. & PLANNING
23. COE EXEC. & PLANNING

24. CWF GENERAL ADMIN.
25. COE GENERAL ADMIN.

26. CWF OPERATING TAXES
27. COE OPERATING TAXES

28. CWF BENEFITS - TTL OPER EXP
29. COE BENEFITS - TTL OPER EXP

30. CWF RENTS - TTL OPER EXP
31. COE RENTS - TTL OPER EXP

A. Total Cash Expenditures Associated with USF

B. Certified Federal USF Receipts:

- B1. High Cost Loop / Frozen High Cost Support (HCL/FHCS)
- B2. Safety Valve Support for acquired Exch. (SVS)
- B3. Alternative Connect America Model (ACAM/ACAM II)
- B4. Connect America Fund, Phase I, II (CAF I/CAF II)
- B5. Rural Digital Opportunity Fund, Phase I (RDOF I)
- B6. Rural Broadband Experiment (RBE)

B7. Total Federal USF Receipts

C. Gross KUSF Receipts (do not deduct KUSF assessments)

D. Total FUSF and KUSF Receipts

E. Do Expenditures Exceed FUSF Receipts?

Amount Expenditures Exceed Certified FUSF

(negative number means FUSF exceeds Expenditures)

F. Do Expenditures Exceed FUSF & KUSF Receipts?

Amount Expenditures Exceed Certified FUSF & KUSF

(negative number means FUSF & KUSF exceeds Expenditures)

Please provide the following information:

Contact: Stacey Brigham

Title: Regulatory Director

Phone No.: 719-266-4334

E-Mail: sbrigham@tcatel.com

REDACTED

**Incumbent ETC Investment and Expenses
Kansas Test for USF Certification**

**24-GIMT-612-GIT
Attachment 2a**

Company Name: S&T Telephone Cooperative Association

DATA YEAR: 2023

Narrative Report for New Investments

ETC Certification for Use of **USF** Support
Provided to the Kansas Corporation Commission

Company Name: S&T Telephone Cooperative Association

Data Year: 2023

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
A	B	C	D	E	F= C x D
Subtotal					
Total					

NOTES:

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255). For CETCs, this amount should match the

Contact: Stacey Brigham
Title: Regulatory Director

Phone No.: 719-2664334
E-Mail: sbrigham@tcatel.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)?

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.

0

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

0.004273504

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 CEO of the S&T Telephone Cooperative Association (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 S&T Telephone Cooperative Association (Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that S&T Telephone Cooperative Association (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 06/14/2024 (date).



Signature

Zack Odell

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 _____ 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 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 _____ (date).

Signature

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 CEO of the S&T Telephone Cooperative Association (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 S&T Telephone Cooperative Association (Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that S&T Telephone Cooperative Association (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 06/14/2024 (date).



Signature

Zack Odell

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
S&T Website; Google Ads; YouTube	Internet	Worldwide	24 / 7 /365
KGCR - FM	Radio	Northwest Kansas	Varies - Monthly
KRDQ	Radio	Northwest Kansas	Varies - Monthly
KWGB - FM	Radio	Northwest Kansas	Varies - Monthly
KXXX / KQLS	Radio	Northwest Kansas	Varies - Monthly
KLOE - AM	Radio	Northwest Kansas	Varies - Monthly
S&T Media	CATV	Service Areas	Varies - Monthly
Various	Newspapers	Northwest Kansas	Varies
Facebook; Instagram; LinkedIn	Social	Worldwide	Varies

S&T Annual Phone Directory	Print	Brewster, Colby, Dighton, Goodland, Grinnell, Kanorado, Levant, Menlo, Russell Springs, Winona, Atwood, Bird City, Gove, Grainfield, Hoxie, Leoti, McDonald, Oakley, Sequin, Sharon Springs, Tribune, Wallace, Weskan Customers & non-customers receive the directory in the mail as long as they have a mailing address with the post office	November 2023
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(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.

N/A for ILEC

COMPARABLE LOCAL USAGE PLAN 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 offers a local usage plan comparable to that of the incumbent. I am binding _____ (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that _____ (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 _____ (date).

Signature

Printed/Typed Name