

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

Before Commissioners:                      Dwight D. Keen, Chair  
    Shari Feist Albrecht  
    Jay Scott Emler

In the Matter of the Application of IdeaTek                      )  
Telcom, LLC as an Eligible Telecommunications                      )  
Carrier for Purposes of Receiving Federal                      ) Docket No. 19-WLDT-102-ETC  
Universal Service Support As Awarded Under                      )  
the Connect America Fund Phase II Auction                      )  
(Auction 903) Program.                      )

**ORDER NUNC PRO TUNC**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and determination. Having examined its files and record, and being duly advised in the premises, the Commission finds and concludes as follows:

1.        On December 18, 2018, the Commission issued an Order Granting Eligible Telecommunications Carrier Status in this Docket. The Order referenced the Applicant as IdeaTek Telecom, LLC in the caption and the body of the order, when the correct name was IdeaTek Telcom, LLC (IdeaTek). As the Order Granting Eligible Telecommunications Status is required to gain funding under Connect America Fund (CAF), Phase II, the correct name of the Applicant needs to be inserted in the caption and the order to permit proper identification of the party and the incorrect name needs to be replaced in both places.

2.        The confusion over the name was in part created when the Applicant incorrectly used the “Telecom” reference in the caption, while correctly identifying the company in the body of the Application. The mistake was inadvertent and resulted in an Order that needs to be

reformed. The restated Order with the correct name is attached to this Order showing the changes that are to be made.

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. To correct the error contained in caption and the body of the Order Granting Eligible Telecommunications Carrier Status issued December 18, 2018, the name IdeaTek Telcom, LLC should be inserted in place of the misspelled name.

B. The Commission retains jurisdiction over IdeaTek Telcom, LLC, and the subject matter of this Docket for the purpose of issuing such additional orders as it may deem necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Keen, Chair; Albrecht, Commissioner; Emler, Commissioner

Dated: 02/12/2019



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Lynn M. Retz  
Secretary to the Commission

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Universal Service Support As Awarded Under                      )  
the Connect America Fund Phase II Auction                      )  
(Auction 903) Program.                      )

**ORDER GRANTING ELIGIBLE TELECOMMUNICATIONS CARRIER STATUS**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and determination. Having examined its files and record, and being duly advised in the premises, the Commission finds and concludes as follows:

**I. BACKGROUND**

1. On September 11, 2018, IdeaTek Telcom, LLC (IdeaTek) filed an Application requesting designation as an Eligible Telecommunications Carrier (ETC) under Section 214(e)(2) of the Telecommunications Act of 1996 and Federal Communications Commission (FCC) Rule 54.201(d).<sup>1</sup> Specifically, IdeaTek seeks ETC status to be able to participate in the high-cost program within the federal universal service fund as a result of the reverse auction (Auction 903) process conducted by the FCC to provide support under the Connect America Fund (CAF), Phase II (Phase II), to receive support in the rendition of voice and broadband service in unserved high-cost areas in Kansas. IdeaTek was awarded \$6,186,881.60 for 2,490 locations under Phase II for certain census blocks located in the rural parts of western Reno and Sedgwick Counties, Kansas and requests ETC designation for the census blocks identified in Exhibits B and C attached to its

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<sup>1</sup> 47 U.S.C. § 214 (e) (1) and 47 C.F.R. § 54.201.

Application.<sup>2</sup> IdeaTek's selected bid offering was presented at the highest performance tier of 1Gbps downstream and 500Mbps upstream with low latency.<sup>3</sup>

2. On November 29, 2018, the Commission Staff (Staff) submitted its Report and Recommendation dated November 28, 2018, which is attached and incorporated by reference, advising the Commission to grant IdeaTek's Application and designate it as an ETC for the purpose of participating in the high-cost federal universal service fund within the census blocks identified as part of its Application and in conjunction with the Phase II auction held by the FCC from July 24, 2018 to August 21, 2018.<sup>4</sup>

## **II. DISCUSSION AND ANALYSIS**

3. The FCC transformed its high-cost program for universal service with an order and rulemaking that changed intercarrier compensation and targeted support in rural, insular and high-cost areas to encourage the deployment of networks capable of providing broadband services.<sup>5</sup> As part of this process, the FCC created the Connect America Fund.<sup>6</sup> The Phase II reverse auction process was designed to award high-cost support up to \$1.98 billion in areas where incumbent price cap carriers had declined to provide a combination of voice and broadband service in high-cost areas of the country.<sup>7</sup> As part of the Phase II process, it was required by a successful bidding

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<sup>2</sup> Application ¶13 at 5.

<sup>3</sup> Application ¶12 at 5.

<sup>4</sup> Staff Report and Recommendation, November 28, 2018 at 10 (Staff R&R).

<sup>5</sup> See Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-94, 17695, paras. 77-83, 86 (2011) (USF/ICC Transformation Order and/or FNPRM), *aff'd sub nom. In re: FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014) (defining "voice telephony service" as the supported service and requiring Connect America Fund support recipients to offer broadband as a condition of receiving support).

<sup>6</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17710, para. 123.

<sup>7</sup> See, USF/ICC Transformation Order and FNPRM, 26 FCC Rcd at 17732, 18085-108, paras. 178, 1189-1295.

telecommunications carrier to obtain ETC certification to be able to receive high-cost universal service support.<sup>8</sup>

4. The Staff Report and Recommendation provides an excellent summary of the Phase II auction process and describes the FCC's federal universal service reforms, which were designed to modernize telecommunication networks by bringing broadband to unserved areas, supporting advanced mobile and broadband networks in rural, insular and high-cost areas and expanding fixed broadband networks.<sup>9</sup> The Staff notes the FCC awarded \$1.49 billion in high-cost support to 103 winning bidders to provide fixed broadband and voice services to over 700,000 locations in 45 states.<sup>10</sup> Staff discusses the deployment schedule for Phase II recipients with 100% of the locations receiving broadband and voice services within 6 years, while 40% are to be in place by the third year and 20% each year thereafter.<sup>11</sup> Staff also sets forth the reporting, certification and data requirements to be filed with the Universal Service Administrative Company on an annual basis as part of the Phase II process.<sup>12</sup> Staff furthermore discusses the financial and letter of credit requirements to assure compliance with the bid proposals and their implementation.<sup>13</sup>

5. Under Section 214(e)(2) of the Federal Telecommunications Act of 1996 (Act), states possess primary authority for designating ETC status. Section 214(e)(2) states:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common

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<sup>8</sup> Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949, 5999, paras 141 et seq. (2016) (Phase II Auction Order and/or FNPRM).

<sup>9</sup> Staff R&R at 1-9.

<sup>10</sup> Id. at 2.

<sup>11</sup> Id. at 2-3.

<sup>12</sup> Id. at 3.

<sup>13</sup> Id.

carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.<sup>14</sup>

To be an ETC for federal support purposes, a telecommunications carrier must meet the requirements set forth in Section 214(e)(1) of the Act, unless those requirements have been subject to forbearance by the FCC. Section 214(e)(1) requirements have been applied consistently since the inception of the Act and appear as follows:

A common carrier designated as an eligible telecommunications carrier ... shall be eligible to receive universal service support in accordance with section 254 ... and shall, throughout the service area for which the designation is received--

**(A)** offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

**(B)** advertise the availability of such services and the charges therefor using media of general distribution.<sup>15</sup>

Universal Service is defined to be an evolving level of telecommunications services as defined by the FCC, "taking into account advances in telecommunications and information technologies and services." Universal Service is further defined to permit access to advanced telecommunications and information services in rural and high cost areas, as set forth in Section 254(b)(3), which states:

Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to

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<sup>14</sup> 47 U.S.C. § 214 (e) (2).

<sup>15</sup> 47 U.S.C. § 214 (e) (1).

those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.<sup>16</sup>

Services supported by Universal Service in rural, insular and high-cost areas are set forth in FCC

Rule 54.101, which states:

(a) Services designated for support. Voice telephony services and broadband service shall be supported by federal universal service support mechanisms.

(1) Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

(2) Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.<sup>17</sup>

6. Based on these legal principles, the Commission now discusses the IdeaTek ETC Application and the supporting Staff Report and Recommendation.

#### **Service or Functionalities**

In the Application, IdeaTek indicates it will provide the supported services under the CAF Phase II universal service programs. Staff summarizes the services IdeaTek will offer as follows:

**Voice-grade access to the public switched network** – IdeaTek operates a voice network switch and media gateways, which are interconnected with the appropriate interexchange carriers (IXCs), incumbent local exchange carrier (ILEC) tandem and end office switches, which enables its voice customers to have access to the public switched network. Within

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<sup>16</sup> 47 U.S.C. § 254 (b) (3).

<sup>17</sup> 47 C.F.R. § 54.101.

its internal network, IdeaTek uses digital Internet Protocol (IP)-based voice technology to transport voice services from the customer premise over fiber optic lines to the IdeaTek switch. IdeaTek's voice technologies offer both traditional functional-equivalent voice landline and Plain Old Telephone Service (POTS), as well as other more advanced voice services such as hosted Private Branch Exchange (PBX) and Session Initiation Protocol (SIP) trunking, which all have access to the Public Switched Telephone Network (PSTN).<sup>18</sup>

**Local usage** – IdeaTek does not charge for local service minutes of use. Local calling is free for all standard voice lines and IdeaTek's local calling scope is much larger than the associated ILEC local calling scope.

**Access to emergency services** – IdeaTek provides 911 services to all of its voice customers and is directly connected with the 911 tandems associated with its service areas.

**Toll limitations for qualifying low-income consumers** – IdeaTek can block toll calling for any customer upon that customer's request. This toll block feature is provided free of charge to all customers.

**Broadband Internet Access Services** – IdeaTek provides fiber optic based broadband Internet services with speeds up to 1 Gbps download and 10 Megabits per second upload for residential users. It routes traffic from a fiber optical network terminal (ONT)/modem at the customer premise to its internal network and then out to Internet service points of presence it maintains with multiple providers. These points are where IdeaTek hands off customer Internet traffic to another Internet carrier and serves to provide access to and from all or substantially all Internet endpoints.<sup>19</sup>

As a result of this analysis, Staff concludes IdeaTek will be able to provide the service and functionalities required by the federal universal support system, consistent with the requirements set forth in Rule 54.101(a).<sup>20</sup>

### **FCC Minimum Service Offering Requirements**

7. As noted, Section 253(b)(3) of the Act requires reasonably comparable telecommunications and information services in high cost areas with those of urban areas. Staff's Report and Recommendation indicates there are reasonably comparable services being provided by IdeaTek with those existing in urban areas. Staff states ETCs must certify to the FCC that

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<sup>18</sup> IdeaTek has approved interconnection agreements with the ILECs in the requested census blocks, AT&T and CenturyLink, in Docket Nos. 10-SWBT-407-IAT and 10-UTDT-800-IAT, respectively.

<sup>19</sup> Staff R&R at 4-5.

<sup>20</sup> Staff R&R at 5.



pricing for basic residential service must be within two standard deviations of the national urban monthly rate of \$25.50.<sup>21</sup> IdeaTek offers a monthly rate of \$25.00 for voice service that permits free nationwide calling, seven-digit area code dialing, 911 service, Caller ID, Call Waiting, Voicemail and 3-way calling. This compares with the AT&T monthly residential rate of \$29.00 and the CenturyLink rate of \$19.48, both limited to calling within the exchange. Because IdeaTek provides expanded nationwide calling for the basic residential rate, Staff maintains that the IdeaTek customers will have reasonably comparable voice service when compared to other Kansas households in non-rural wire centers.<sup>22</sup>

8. With respect to broadband services, the urban benchmark rate is \$85.54 for 4Mbps/1Mbps and \$217.43 for 1,000Mbps/100Mbps. This compares to the IdeaTek rates of \$40 per month for 25Mbps/5Mbps and \$100 for 1Gbps/500Mbps, which is well below the national benchmark and consequently, according to Staff, reasonably compares to broadband rates in urban areas. IdeaTek does not have usage limitations for broadband service, which also reasonably compares with the Lifeline minimum standard usage rate made effective by the FCC on December 1, 2018. This also demonstrates comparability with other affordable broadband services being offered in Kansas based on the Staff analysis.<sup>23</sup>

#### **Types of Facilities Used**

9. IdeaTek operates a fiber optic network. According to Staff, the network operates on an Internet Protocol (IP) Ethernet standards infrastructure and telephony service is delivered on an IP-based network session initiation protocol or SIP.<sup>24</sup> IdeaTek states its voice services are provided as Voice over Internet Protocol (VoIP) and are functionally equivalent to telephone

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<sup>21</sup> Staff R&R at 5.

<sup>22</sup> Id.

<sup>23</sup> Id.

<sup>24</sup> Staff R&R at 6.

service and are comparably priced with traditional landline voice service. Staff has indicated it had no issues with these facilities and noted IdeaTek had stated that its voice telephony was covered by K.S.A. 2018 Supp. 66-2017 (d) (1)<sup>25</sup> and is otherwise not restricted for universal fund support.<sup>26</sup>

### **Service Areas**

10. Section 214(e)(1) of the Act requires an ETC to offer supported services throughout the service area where a designation is made by a state commission. The relevant service area under Section 214(e)(5) is the geographic area established by the Commission for universal service support or in the case of a rural carrier, the company's study area unless otherwise established by the FCC taking into account any recommendations made by the Federal-State Joint Board. However, for purposes of CAF Phase II, the FCC indicated the relevant areas for eligibility in the competitive bidding process would be at a minimum the census block.<sup>27</sup> Accordingly, the FCC determined the statutory definition of a service area should not apply and would forebear application in favor of the census block as the relevant geographic designation for establishing service areas for universal service support.<sup>28</sup> The IdeaTek Application therefore is based on the census block as the service area for the purpose of ETC designation.<sup>29</sup>

11. As part of its application, IdeaTek seeks eligibility status in 597 census blocks awarded by the FCC in Auction 903, and those areas are provided in Exhibit B of the Application and are set forth in Exhibit 1 of the Staff Report and Recommendation attached to the Order.<sup>30</sup> As noted by the Staff, the census blocks awarded in IdeaTek are located in the Abbyville, Arlington,

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<sup>25</sup> Id.

<sup>26</sup> See, e.g., K.S.A. 2017 Supp. 66-217 (b) (1).

<sup>27</sup> Connect America et al., Report and Order and Further Notice of Proposed Rulemaking, May 26, 2016, ¶ 61, "Phase II Auction Order".

<sup>28</sup> Phase II Auction Order at ¶¶157-168.

<sup>29</sup> Application ¶13 at 5.

<sup>30</sup> Id. at Exhibit B.

Burrton, Landon, Partridge, Pretty Prairie, Sterling and Sylvia exchanges within Century-Link territory and Andale, Cheney, Garden Plain, Halstead, Hutchinson, Kingman, and Nickerson exchanges served by AT&T, as well as the Colwich, Goddard and Parkview Zones found in AT&T's Wichita Exchange.<sup>31</sup> IdeaTek would be required to provide supported services in each of these census blocks and has indicated it has the technical and financial ability to serve each of the census blocks included in the Application.<sup>32</sup> Based on the Staff review, the Commission finds it appropriate to consider ETC designation based on the census blocks identified in Exhibit B of the Application.<sup>33</sup> Staff has noted that fifty-one of the Burrton census blocks have previously been certified by the Commission for ETC eligibility and federal high-cost support, but given the changes being made in the high-cost program, the Commission is not differentiating between these census blocks and is including all census blocks included in the application, including the fifty-one Burrton census blocks, for the purpose of making the ETC designation.<sup>34</sup>

### **Advertising**

12. ETCs are required to advertise the availability of services supported by universal service and the charges to be assessed throughout their designated service areas under Section 214(e)(1) of the Act. IdeaTek indicates it advertises the availability of service through various media outlets, including websites, digital advertising, newspaper, radio, direct mailings, public exhibits and displays and billing inserts. The Staff has reviewed the language IdeaTek proposes to use in advertising its services and has approved the content.<sup>35</sup> The language IdeaTek proposes to use in its advertising also conforms to requirements set forth by the Commission in Docket No.

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<sup>31</sup> Staff R&R at 7.

<sup>32</sup> Application at ¶28 at 12.

<sup>33</sup> Staff R&R at 7.

<sup>34</sup> Id.

<sup>35</sup> Staff R&R at 8.

06-GIMT-446-GIT and includes contact information for the Office of Public Affairs and Consumer Protection in the event customers need to ask questions about the service or register complaints.<sup>36</sup> Accordingly, the Commission finds IdeaTek will satisfy the advertising requirements set forth in Section 214(e)(1) of the Act.

### **Public Interest**

13. The Commission is authorized to designate a carrier an ETC consistent with the public interest, convenience and necessity as set forth in Section 214(e)(2) of the Act. The IdeaTek Application seeks authority for ETC status in the service territories of two price cap carriers, AT&T and CenturyLink, resulting in a less rigorous public interest review under the Act.<sup>37</sup> Nonetheless, the Commission has utilized certain principles highlighted by the FCC in its *Virginia Cellular Order* as a basis for determining whether multiple ETC designations are in the public interest for a particular service area.<sup>38</sup> It is important to note when considering the public interest that the service areas in question currently are not served by a carrier offering both voice and broadband.

14. IdeaTek has provided several factors for the Commission to consider in determining whether its Application is in the public interest. They are:

**Benefits of Increased Competitive Choice** – By FCC rule, a census block was only available for the Phase II 903 Auction if no unsubsidized competitor was serving in the block. IdeaTek indicates that ETC designation will bring competition, or at least minimum, qualifying services to the census blocks in question. IdeaTek maintains competition will bring innovation and investment in areas now being unserved with broadband. IdeaTek emphasizes that competition

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<sup>36</sup> Id.

<sup>37</sup> Staff R & R. at 8.

<sup>38</sup> See In the Matter of Federal State Joint Board on Universal Service: Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia, Rel. January 22, 2004 (“Virginia Cellular Order”), FCC Docket No. DA 03-338; and see also, Order in Docket No. 04-ALKT-283-ETC, September 24, 2004, and Order in Docket No. 04-RCCT-338-ETC, September 30, 2004.

will increase the service levels in the areas where it does business as the incumbent providers respond to the service offerings coming into their territories.

**Impact of Multiple Designations on the Universal Service Fund** – IdeaTek has participated in the Universal Service Administrative Company high cost programs as a competitive ETC and provides service under the Schools and Libraries and Lifeline programs. The FCC allocated \$1.98 billion to its Auction 903 Phase II program over a 10 year period, resulting in the IdeaTek awards not being duplicative and within the FCC budget. As a competitive ETC, IdeaTek is not eligible for the KUSF; and the universal service funds are not negatively impacted with an ETC designation for the census blocks covered by the Application.

**Unique Advantages and Disadvantages of the Competitor's Service Offering** – IdeaTek has committed to providing a gigabit-speed network. It is the only carrier making this high tier offering in Kansas under the Phase II Auction program. This will allow remote areas of Kansas to have access to an advanced broadband network with some of the fastest speeds in Kansas and lasting scalability for the future. No disadvantages were identified as part of the IdeaTek service offering.

**Commitments Made Regarding High-quality Telecommunications Services By Company** – Staff indicates that IdeaTek uses advanced fiber optic infrastructure, which is the basic component of IdeaTek's service quality and reliability. Its service nodes are generally served by redundant equipment/hardware, multiple network service points (ring network or mesh network topology), and multiple power sources (utility, battery, generator). IdeaTek utilizes a distributed network design that does not rely on a single point or core (when feasible) but rather distributes resource needs and loads based on service availability. The Company maintains multiple, redundant network egress/ingress points, provides 24/7/365 customer support, and a 24/7/365 network operation center, which monitors the network, responds to trouble, and mitigates network issues. Furthermore, the Company maintains emergency equipment, material stock, and mobile generators for disaster situations such as ice storms and tornadoes. The Company has operation plans and response/staging locations for emergency situations, as needed.<sup>39</sup>

**Competitive ETC's Ability to Provide the Support Services Throughout the Designated Service Area Within a Reasonable Time Frame** - IdeaTek has constructed over 2,600 miles of fiber in the state of Kansas in the last 15 years and is well versed in the risks and challenges of service delivery in low density/high cost service areas. IdeaTek has developed deployment models and methods, which enable it to deliver services in areas other providers will not deploy in. IdeaTek expects to have the network constructed in in approximately three years, half the time that is accorded under Phase II.<sup>40</sup>

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<sup>39</sup> See IdeaTek response to Staff RFI 4.

<sup>40</sup> Staff R & R at 8-9.

After reviewing the Application with the benefit of information requests and considering the public interest factors set forth above, the Staff concludes that designating IdeaTek an ETC as a result of the CAF Phase II Auction is in the public interest for the 597 census blocks identified in this docket.

### **III. FINDINGS AND CONCLUSIONS**

14. The Commission adopts the Staff's Report and Recommendation of November 28, 2018, and its analysis in support of the IdeaTek Application for ETC status. The application is a product of the FCC CAF Phase II reverse auction and seeks ETC designation in order to participate in the high-cost program within the federal universal service fund. It proposes to provide the highest tier of service under the Phase II Auction and is unique in delivering advanced broadband service at 1 Gbps and 500 Mbps to 2,490 unserved locations in 597 census blocks. The Application meets the requirements of Section 214(e)(1) and is consistent with the public interest, convenience and necessity.

#### **IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. The IdeaTek Telcom, LLC's Application filed in this matter on September 11, 2018, is hereby granted and IdeaTek Telcom is designated an Eligible Telecommunications Carrier in the 597 census blocks identified in its Application for the purpose of qualifying for the high cost fund within the federal universal service program, and in conformity with the Connect America Fund Phase II Auction. The designated service area for the purpose of this order is identified as Attachment 1 to the Staff Report and Recommendation of November 28, 2018, which is incorporated as part of the Order.

B. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529 (a) (1).<sup>41</sup>

C. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further order, or orders, as it may deem necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Albrecht, Chair; Emler, Commissioner; Keen, Commissioner

Dated: \_\_\_\_\_

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Lynn M. Retz  
Secretary to the Commission

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<sup>41</sup> K.S.A. 66-118b; K.S.A. 77-503 (c) and K.S.A. 77-531(b).

**CERTIFICATE OF SERVICE**

19-WLDT-102-ETC

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of electronic service on 02/12/2019.

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