

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation Into the)
Adjustments of Intrastate Switched Access Charges)
for Rural Telephone Companies in Compliance)
with K.S.A. 66-2005(c) and FCC Reforms.)

Docket No. 16-GIMT-587-GIT

Direct Testimony

Prepared by

Sandy Reams

On Behalf of

Kansas Corporation Commission Staff

September 21, 2016

1 **Q. Please state your name and your employer.**

2 **A.** My name is Sandra (Sandy) Reams. I am the Assistant Chief of Telecommunications
3 employed by the Kansas Corporation Commission (Commission), 1500 Southwest
4 Arrowhead Road, Topeka, Kansas 66604.

5 **Q. What is your educational and professional background?**

6 **A.** I received a Bachelor of Arts in Accounting from Buena Vista University, Storm Lake,
7 Iowa, and hold Iowa Certified Public Accountant (CPA) Certificate No. 9487. In
8 December 1996, I became employed by the Commission as a Utility Regulatory Auditor
9 and was promoted to Senior Utility Regulatory Auditor in June 1997. In February 1998,
10 I changed positions to a Telecommunications Auditor and in April 2002, I was promoted
11 to Managing Auditor. In October 2011, I was promoted to my current position.

12 During my employment with the Commission, I have attended various regulatory and
13 telecommunications related courses. I have been a member of the National Association
14 of Regulatory Utility Commissioners' (NARUC) Staff Subcommittee on State Universal
15 Service Fund Administrators since 2002 and have served as the Subcommittee Chair
16 since August 2010. I also serve as an at-large Staff member on the Federal - State Joint
17 Board on Separations. I previously served as the Staff Chair for the State
18 Commissioners of the Federal - State Joint Conference on Accounting Issues and as a
19 member of the Federal - State Joint Oversight Team for the audits of Southwestern Bell
20 Telephone Company's (SWBT) compliance with affiliate transaction and non-
21 discriminatory provisions contained in Section 272 of the 1996 Federal
22 Telecommunications Act.

Q. Have you previously testified before the Commission?

A. Yes. I have provided written and oral testimony on intrastate access issues, the annual Kansas Universal Service Fund (KUSF) assessment rate and other KUSF-related issues, inter-LATA dialing parity and related cost recovery mechanisms, intrastate revenue requirement cost of service components, and Eligible Telecommunications Carrier (ETC) issues. Prior to joining the telecommunications section, I testified on gas industry issues, including shared service agreements, tax-related issues, and acquisition premiums.

I. Testimony Summary

Q. Please summarize your testimony.

A. My testimony discusses the Federal Communications Commission's (FCC) Intercarrier Compensation (ICC) reforms as they relate to K.S.A. 66-2005(c)'s requirement that the Rural Local Exchange Carriers (RLECs) adjust their intrastate switched access rates to parity with their interstate rates in odd-numbered years. My testimony discusses Staff's analysis of the data filed by the RLECs, the calculated change in their intrastate access revenues and KUSF support, and the related implementation issues.

The RLECs' data, summarized in Attachment 1 to my testimony, supports Staff's recommendations that the Commission issue an Order to:

- adopt the intrastate originating switched access rates, calculated intrastate originating and terminating access revenues, net revenue changes, and Connect America Fund (CAF) support offsets, identified in Attachment 1;
- adopt a net aggregate \$411,976 reduction in the RLECs' annual KUSF support;
- require the RLECs to file revised intrastate access tariffs in a separate proceeding to be opened later by the Commission to address the FCC's July 2017 reforms; and

- determine that the RLECs' revised intrastate originating access rates¹ and adjustments to their KUSF support be effective July 2017, concurrent with the FCC's implementation of the July 2017² ICC reforms.

Q. Please identify the documentation filed in support of your testimony.

A. Attachment 1 summarizes the data filed by the RLECs, as follows:

- page 1 summarizes the aggregate net change in each RLEC's intrastate originating and terminating access revenues, the applicable CAF support offset, and the resulting annual KUSF support impact;
- pages 2 and 3 show each RLEC's interstate and intrastate originating access rates, minutes of use (MOU), and resulting calculated revenues; and
- pages 4 and 5 show each RLEC's intrastate terminating access rates, MOU, and resulting calculated revenues.

Some MOU were designated as confidential, therefore, both a confidential and redacted Attachment 1 are being filed with my testimony. Access rates are calculated out six decimal places; therefore, the numbers in my testimony and Attachment 1 are rounded.

I. FCC Reforms

Q. Briefly explain the FCC's ICC reforms to date.

A. On November 18, 2011, the FCC released its Report and Order and Further Notice of Proposed Rulemaking³ (USF/ICC Order) and determined, in part, to reform the interstate and intrastate ICC regimes. The FCC capped all rate-of-return carriers' interstate originating and terminating switched access and reciprocal compensation rates and all intrastate terminating access rates as of December 29, 2011, but did not cap intrastate originating access rates. The FCC determined it would transition interstate and intrastate

¹ The July 2017 intrastate terminating access rates will be determined by the FCC; therefore, the Commission does not need to adopt revised intrastate terminating access rates in this proceeding.

² July 1, 2017, is a Saturday, thus, the intrastate originating access rate revisions should be implemented concurrent with the FCC's July 2017 implementation date.

³ See *In the Matter of Connect America Fund*, 26 F.C.C. Rcd. 17663 (Nov. 18, 2011).

1 terminating switched end office access rates to a Bill and Keep methodology, effective
2 July 2020. To “mitigate the effect of reduced intercarrier revenues on carriers and
3 facilitate continued investment in broadband infrastructure, while providing greater
4 certainty and predictability going forward than the *status quo*,”⁴ the FCC created two new
5 transitional recovery mechanisms - the CAF and Access Recovery Charge (ARC). CAF
6 support is recovered via the Federal fund and the ARC is recovered from a Local
7 Exchange Carrier’s (LEC) end users.

8 The FCC, through subsequent Orders, clarified its USF/ICC Order and harmonized its
9 rules. In March 2013, the FCC determined that RLECs participating in the National
10 Exchange Carrier Association (NECA) interstate access pools should adjust their
11 interstate (and intrastate) access rates to account for the impact RLECs entering or
12 exiting NECA’s access pools have on the pools.⁵ NECA, therefore, increases or reduces
13 its interstate terminating access rates to account for the impact of RLECs entering or
14 exiting its pools. Thus, each RLEC concurring in NECA’s tariff must also increase or
15 reduce its intrastate terminating rates to remain in parity with its interstate rates and
16 absent a NECA pool-related change, an RLEC cannot increase its intrastate terminating
17 access rates.

18 **Q. How have the FCC’s reforms impacted the RLECs’ intrastate terminating access**
19 **rates?**

20 **A.** The initial two phases of the FCC’s reforms, effective July 2012 and 2013, required each
21 LEC meeting certain revenue criteria to transition its intrastate switched end office access

⁴ Id., ¶ 36.

⁵ 47 C.F.R. §51.909. See also *In the Matter of Connect America Fund*, 28 F.C.C. Rcd 3319 (March 27, 2013).

1 and transport⁶ rates, rate structure, and revenues to parity with its interstate access rates,
2 rate structure, and revenues.⁷ Effective July 2014, the RLECs combined their terminating
3 local switching and information surcharge rates into a single, composite end office rate.
4 Beginning July 2014, the RLECs transitioned their interstate and intrastate terminating
5 end office rates towards \$.005 via an annual reduction equal to one-third of the
6 differential between the RLEC's then current rate and \$.005. As of July 2016, all of the
7 RLECs' interstate and intrastate terminating end office rates are \$.005. In addition, the
8 majority of the RLECs' intrastate terminating transport rates are in parity with their
9 interstate rates. Thus, on a going-forward basis, the RLECs' intrastate terminating end
10 office and transport rates should remain in parity with their interstate end office and
11 transport rates, with limited exceptions.

12 **Q. The FCC's reforms created several conflicts with K.S.A. 66-2005(c). Please**
13 **summarize the conflicts and how the Commission resolved them.**

14 A. First, K.S.A. 66-2005(c) requires the RLECs, subject to the Commission's approval, to
15 reduce their intrastate access rates to parity with their interstate rates on March 1st in odd-
16 numbered years. This conflicts with the FCC's reforms, which are effective every July.
17 To resolve this conflict, the Commission determined the RLECs' intrastate access rate
18 adjustments will be effective each July to coincide with the FCC's reforms.⁸

⁶ Transport includes Termination, Facility, and Tandem Switching services, as well as other local transport services.

⁷ The Commission addressed the FCC's reforms, for the RLECs, as follows: the July 2012 reforms in Docket No. 12-GIMT-170-GIT (Docket 12-170); the July 2013 reforms in Docket No. 13-GIMT-004-GIT (Docket 13-004); the July 2014 reforms in Docket No. 14-GIMT-446-GIT; the July 2015 reforms in Docket No. 15-GIMT-068-GIT (Docket 15-068); and the July 2016 reforms in Docket No. 16-GIMT-413-GIT (Docket 16-413).

⁸ Docket 13-004, September 14, 2014, Order Implementing Intrastate Switched Access Adjustments for Rural Local Exchange Carriers.

1 Next, K.S.A. 66-2005(c) does not distinguish between originating and terminating access
2 rates whereas the FCC's reforms focus on terminating access rates. K.S.A. 66-2005(c)
3 requires an RLEC to adjust its intrastate originating and terminating access rates to parity
4 with its interstate rates. In contrast, the FCC allows an RLEC to adjust its originating
5 access rates to parity, but only allows an RLEC participating in NECA's tariff or a NECA
6 pool recipient that withdraws from NECA's tariff to increase its intrastate terminating
7 access rates to parity. To resolve this conflict, the Commission has recognized an RLEC
8 may increase its intrastate originating rates to parity with its interstate rates and an RLEC
9 may increase its intrastate terminating rates to parity pursuant to FCC rules.⁹

10 Finally, K.S.A. 66-2005(c)(1) allows an RLEC to recover a reduction in its intrastate
11 access revenue via the KUSF on a revenue-neutral basis whereas the FCC allows an
12 RLEC to recover a percentage of its interstate and intrastate terminating access revenue
13 requirement via the CAF and ARC. K.S.A. 66-2005(c)(1) was amended, effective July
14 2013, to state a reduction in an RLEC's intrastate "cost recovery due to reduction of its
15 intrastate access revenue, except such revenue recovered from another support
16 mechanism, shall be recovered from the KUSF." Therefore, the Commission determined
17 an increase in an RLEC's intrastate originating or terminating access revenue will
18 continue to be applied as a reduction to an RLEC's KUSF support and a reduction in an
19 RLEC's intrastate terminating access revenue may result in an increase in the RLEC's

⁹ Docket 15-068, August 26, 2014, Order Opening Docket; Requiring RLEC Data Filings; Procedural Schedule; Discovery Order; Protective Order; General Service Matters.

1 KUSF support to the extent the revenue is not recovered via CAF or ARC support.¹⁰

2 **Q. Please explain the relevance of NECA's interstate access pool and tariff to this**
3 **Docket.**

4 A. NECA manages an access cost pool and tariff for a majority of the RLECs in the country.
5 The costs and usage of all member RLECs are pooled together to determine the interstate
6 access rates necessary to allow each participating RLEC to recover its interstate access
7 revenue requirement. NECA's tariff contains eight originating and terminating Rate
8 Bands, separately for premium and non-premium switched end office access service, and
9 two Rate Bands for originating and terminating transport service. The Rate Bands in
10 NECA's tariff allow RLECs with higher costs to recover their costs via higher rates and
11 those with lower costs to recover their costs via lower rates.

12 All of Kansas' RLECs, except Columbus Communications Services, LLC (Columbus);
13 LaHarpe Telephone Company, Inc. (LaHarpe); Pioneer Telephone Association, Inc.
14 (Pioneer); Moundridge Telephone Company (Moundridge); Rural Telephone Service Co.,
15 Inc. (Rural); and Totah Telephone Co., Inc. (Totah); concur in NECA's access pool and
16 tariff. Columbus and LaHarpe maintain their own interstate access tariffs. Effective
17 July 2016, Pioneer, Moundridge, Rural, and Totah withdrew from NECA's tariff and
18 maintain their own interstate access tariffs.¹¹

¹⁰ *In the Matter of an Investigation to Determine Intrastate Access Revenue due to Rural Local Exchange Carriers*, Docket No. 16-GIMT-468-GIT, April 26, 2016, Order Opening Docket To Determine Intrastate Access Revenue Due to Rural Local Exchange Carriers.

¹¹ Moundridge, Pioneer and Totah's interstate tariffs are included in John Staurulakis, Inc.'s interstate tariff. Rural's interstate tariff is contained in Alexicon's interstate tariff. Totah has advised Staff of a typographical error in its interstate Information Surcharge tariff rate, which it intends to revise.

II. Intrastate Access Rates and Revenues

Q. How do the RLECs tariff their intrastate access services?

A. For intrastate access purposes, Blue Valley Tele-Communications, Inc. (Blue Valley) maintains an intrastate access tariff that functions similar to NECA's tariff, with most of the RLECs concurring in Blue Valley's tariff. Historically, Blue Valley revised its intrastate access tariff in odd-numbered years, pursuant to K.S.A. 66-2005(c), to align its intrastate rates to parity with NECA's rates. Subsequent to the FCC's implementation of its ICC reforms, Blue Valley adjusts its intrastate originating rates to parity with NECA's interstate rates on a biennial basis, consistent with K.S.A. 66-2005(c), but adjusts its intrastate terminating rates to parity each July.

Columbus and LaHarpe have their own intrastate access tariffs. Pioneer concurs with some rates in Blue Valley's tariff and, for rates with which it does not concur, has company-specific rates in Blue Valley's tariff. Since Pioneer, Moundridge, Rural, and Totah have withdrawn from NECA's tariff; each company may either concur in Blue Valley's tariff, with company-specific intrastate rates identified in the tariff or implement its own intrastate access tariff.

Q. What information did each RLEC file in the Docket?

A. Pursuant to the Commission's July 14, 2016, Order opening this Docket (Opening Order), each RLEC filed its July 1, 2016, interstate and intrastate access rates,¹² its MOU for the twelve months' ended June 30, 2016, its calculated intrastate access revenues, its

¹² Docket 16-413, June 7, 2016, Order Approving Tariff Revisions for Blue Valley, Columbus, LaHarpe, and CenturyLink.

1 CAF and ARC support, and the resulting KUSF support adjustment. The RLECs also
2 provided electronic copies of their information to Staff.

3 **Q. Please discuss Staff's analysis of the RLECs' data.**

4 A. Staff reviewed the RLECs' filed data to ensure each RLEC reported the correct July 1,
5 2016, interstate and intrastate access rates. Staff compared the MOU reported for the
6 twelve months' ended June 30, 2016, to the MOU reported for the twelve months' ended
7 June 30, 2014,¹³ to determine if the changes appeared reasonable. Staff then input the
8 RLECs' reported rates and MOU into Staff's Excel workbook, or Attachment 1, to verify
9 that Staff and each RLEC arrived at the same revenue and KUSF impact calculations.
10 Staff contacted each RLEC and/or its consultant to discuss questions and information that
11 needed to be revised. Revisions have been provided to Staff and filed in the Docket.¹⁴

12 **Q. What are the results of Staff's analysis?**

13 A. Attachment 1 shows all of the RLECs except Columbus, LaHarpe, Pioneer, and Totah
14 will increase their intrastate originating rates to parity with their interstate rates.
15 Columbus, LaHarpe, and Pioneer will not adjust their intrastate originating rates as they
16 are at parity with their interstate rates. Moundridge and Rural were NECA pool
17 recipients and required to increase their interstate originating rates upon exiting NECA's
18 pool. Thus, Moundridge and Rural will increase their intrastate originating access rates to
19 parity with their interstate rates. Totah, as a NECA pool contributor,¹⁵ reduced its

¹³ As reported by each RLEC in Docket 15-068.

¹⁴ Although some RLECs have filed revised MOU data, several RLECs and/or their consultants have advised Staff that further review of switch and/or billing data is being conducted to verify the underlying data. Such reviews may take some time to finalize; therefore, it is possible an RLEC will need to file revised data upon completion of such review.

¹⁵ 47 C.F.R. §51.909(a)(4).

1 interstate originating rates, and will reduce its intrastate originating rates to parity with its
2 interstate rates. In total, the RLECs will increase their intrastate originating access
3 revenues a net \$439,457, comprised of:

- 4 • a \$400,226 net increase in switched end office revenue;
- 5 • a \$34,786 net increase in transport revenue; and
- 6 • a \$4,446 net increase in information surcharge revenue.

7 **Q. Please continue.**

8 A. For intrastate terminating rate purposes, none of the RLECs will increase their end office
9 rates since they are at parity with their interstate rates. The RLECs participating in
10 NECA's access tariff and Columbus, LaHarpe, and Pioneer have intrastate terminating
11 transport rates at parity with their interstate rates and, therefore, will not make any rate
12 adjustments. Although Moundridge and Rural were required to increase their interstate
13 terminating transport rates, they will not increase their intrastate terminating transport
14 rates since the intrastate rates are lower than the interstate rates. Totah, as a NECA pool
15 contributor, reduced its interstate terminating rates when it withdrew from NECA's pool
16 and will reduce its intrastate transport rates to parity with its interstate rates.

17 The impact to the RLECs' intrastate terminating revenue is limited to the terminating
18 revenue reduction calculated for Totah - \$1,356. As further discussed later in my
19 testimony, this reduction will not impact the KUSF since it will be recovered via CAF
20 and ARC support.

III. KUSF Impact

Q. Please explain how the CAF and ARC support received by each RLEC affected Staff's calculation of the impact to an RLEC's KUSF support.

A. In 2013, the Commission determined an RLEC could not recover a reduction in its intrastate terminating access revenue from the KUSF.¹⁶ The RLECs appealed the Commission's decisions and the Court of Appeals determined K.S.A. 66-2005(c)(1) is not preempted by the FCC's reforms, stating:

This statute continues to provide support to rural telephone companies for cost recovery lost due to reduced intrastate access revenue. . . . A logical reading of K.S.A. 66-2005(c)(1), however, infers that the RLECs will be required to seek support from the CAF and/or federally allowed access recovery charges before seeking KUSF distributions.¹⁷

The RLECs, therefore, reported their CAF and ARC support.¹⁸ Totah will be the only RLEC to reduce its intrastate terminating rates and experience a calculated intrastate terminating access revenue reduction.¹⁹ Totah will not recover any additional monies from the KUSF since its CAF support exceeds its intrastate terminating access revenue reduction.

Q. The calculated intrastate access revenue change determined in this Docket will be used to calculate the KUSF assessment rate, effective March 1, 2017, in Docket No.

¹⁶ Docket 12-170, May 29, 2013, Order and Docket No. 13-GIMT-004-GIT, May 22, 2013, Order, mailed May 31, 2013.

¹⁷ *Bluestem Tel. Co. v. Kan. Corp. Comm'n*, No. 112,364, Corrected Opinion at 26. (C.A. Kan. Mar. 22, 2016), *correcting* *Bluestem Tel. Co. v. Kan. Corp. Comm'n*, 52 Kan. App. 2d 96 (Nov. 25, 2015).

¹⁸ Attachment 1, p. 4, to Staff's Report and Recommendation, dated July 8, 2016, enclosed with the Opening Order. ARC and CAF support provide recovery for interstate and intrastate terminating access revenues and reciprocal compensation and should be allocated to these revenue categories. The CAF support reported by each RLEC exceeds its calculated intrastate terminating access revenue reduction, thereby eliminating any additional KUSF support. Staff, therefore, only recognized the reported CAF support and did not analyze or reflect the reported ARC support allocations.

¹⁹ Calculations of Access Reductions of Independent Telecommunications Group, Totah Communications, Inc.; Attachment 1, p. 4.

1 **17-GIMT-008-GIT.²⁰ What impact will the RLECs' intrastate originating and**
2 **terminating access rate adjustments have on the KUSF?**

3 A. The RLECs will increase their total intrastate access revenue a net \$438,101, comprised
4 of a net \$439,457 increase in originating revenue and a \$1,356 reduction in terminating
5 revenue. Bluestem Telephone Company, Inc.; FairPoint Communications Missouri, Inc.;
6 Haviland Telephone Company, Inc.; MoKan Dial, Inc.; Moundridge; and Sunflower
7 Telephone Company, Inc. do not receive KUSF support. The intrastate revenues
8 calculated for these RLECs cannot be applied as an offset to the KUSF and must be
9 subtracted from the KUSF impact. The net impact to the KUSF is an annual reduction of
10 \$411,976, effective July 2017.

11 **Q. K.S.A. 66-2005(c)(2) limits the amount of the access revenue recovery in relationship**
12 **to the increase in the KUSF assessment. Please explain the impact of that limitation**
13 **on this year's access revenue calculations.**

14 A. The RLECs will experience a net, aggregate increase in their intrastate access revenue,
15 with a corresponding reduction in their KUSF support. Since there is no increase in the
16 KUSF support payable to the RLECs, the .75% cap is moot.²¹

17 **Q. Should the RLECs that do not receive KUSF support implement the intrastate**
18 **access rate changes?**

19 A. Yes. These RLECs should implement the access rate adjustments.

²⁰ *In the Matter of An Investigation to Determine the Assessment Rate and the Affordable Local Service Rate for Rate-of-Return Regulated Carriers for the Twenty-First Year of the Kansas Universal Service Fund, Effective March 1, 2017*, Docket No. 17-GIMT-008-GIT.

²¹ The March 1, 2016, KUSF assessment rate, adopted in Docket No. 16-GIMT-067-GIT, is based on a \$729.9 million assessable revenue base. Assuming this same assessable revenue base would result in the .75% cap being approximately \$5.47 million.

III. Implementation Issues

Q. What steps are necessary to implement the access rate changes?

A. The RLECs will need to file revised intrastate access tariffs to implement new rates, effective July 2017. The intrastate originating access rates adopted in this Docket will be effective July 2017; however, the July 2017 intrastate terminating rates will be those determined in accordance with the FCC's reforms. For administrative efficiency, Staff recommends that the RLECs file one set of tariffs for their revised intrastate originating and terminating rates. The Commission will need to open a new proceeding in early 2017 to address the FCC's July 2017 reforms, therefore, the RLECs should file their revised tariffs in that docket.

Q. Please summarize Staff's recommendations to the Commission.

A. Staff recommends that the Commission issue an Order to adopt the following, as identified in Attachment 1, effective July 2017: 1) the intrastate originating switched access rates; 2) the calculated originating and terminating access revenues and net revenue changes; 3) the CAF support offsets; and 4) a net aggregate \$411,976 reduction in the RLECs' annual KUSF support. Staff also recommends that the Commission direct the RLECs to file their revised intrastate access tariffs in a separate proceeding to be opened at a later date by the Commission to address the FCC's July 2017 reforms.

Q. Does this conclude your Testimony?

A. Yes.

Summary of RLEC Intrastate Access Revenue Changes
and KUSF Support Adjustments

Originating Revenue						Terminating Revenue						Net Revenue (Without CAF) (L = D+H)	Total KUSF Increase / (Reduction) (M = E+K)
Company	End Office (A)	LT (B)	Info- Surcharge (C)	Total (D = A+B+C)	KUSF Impact (E)	End Office (F)	LT (G)	Total (H = F+G)	CAF Offset [2] (I)	Total (J = I - H)	KUSF Impact (K)		
Bluestem [1]	\$ 266	\$ 21	\$ 6	\$ 294	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 294	\$ -
Blue Valley	3,016	101	34	3,151	(3,151)	-	-	-	46,983	46,983	-	3,151	(3,151)
Columbus	-	-	-	-	-	-	-	-	129,024	129,024	-	-	-
Council Grove	582	192	7	781	(781)	-	-	-	34,882	34,882	-	781	(781)
CrawKan	3,210	228	46	3,483	(3,483)	-	-	-	305,320	305,320	-	3,483	(3,483)
Cunningham	174	1	2	177	(177)	-	-	-	23,405	23,405	-	177	(177)
Elkhart	288	112	3	404	(404)	-	-	-	7,498	7,498	-	404	(404)
FairPoint MO	104	29	1	134	-	-	-	-	-	-	-	134	-
Golden Belt	2,034	45	23	2,101	(2,101)	-	-	-	99,501	99,501	-	2,101	(2,101)
Gorham	227	7	3	237	(237)	-	-	-	6,992	6,992	-	237	(237)
H & B Comm	298	22	5	323	(323)	-	-	-	19,481	19,481	-	323	(323)
Haviland [1]	593	38	17	648	-	-	-	-	47,352	47,352	-	648	-
Home	378	61	4	444	(444)	-	-	-	100,662	100,662	-	444	(444)
JBN	614	20	9	643	(643)	-	-	-	76,896	76,896	-	643	(643)
KanOkla	888	59	10	956	(956)	-	-	-	47,423	47,423	-	956	(956)
LaHarpe	-	-	-	-	-	-	-	-	152,365	152,365	-	-	-
Madison	74	-	1	75	(75)	-	-	-	9,384	9,384	-	75	(75)
MoKan [1]	984	33	19	1,036	-	-	-	-	17,740	17,740	-	1,036	-
Moundridge [1]	24,109	73	265	24,448	-	-	-	-	50,768	50,768	-	24,448	-
Mutual	113	7	1	121	(121)	-	-	-	15,123	15,123	-	121	(121)
Peoples	100	0	1	101	(101)	-	-	-	39,055	39,055	-	101	(101)
Pioneer	-	-	-	-	-	-	-	-	354,731	354,731	-	-	-
Rainbow	1,238	85	14	1,337	(1,337)	-	-	-	39,952	39,952	-	1,337	(1,337)
Rural	356,083	33,621	3,920	393,624	(393,624)	-	-	-	126,500	126,500	-	393,624	(393,624)
S & A	208	13	2	223	(223)	-	-	-	3,239	3,239	-	223	(223)
S & T	275	1	3	279	(279)	-	-	-	39,952	39,952	-	279	(279)
South Central	699	19	10	728	(728)	-	-	-	15,799	15,799	-	728	(728)
Southern KS	451	31	17	499	(499)	-	-	-	5,207	5,207	-	499	(499)
Sunflower [1]	743	162	17	922	-	-	-	-	-	-	-	922	-
Total	(4,064)	(957)	(74)	(5,096)	5,096	-	(1,356)	(1,356)	23,587	22,231	-	(6,452)	5,096
Tri-County	1,413	9	18	1,440	(1,440)	-	-	-	77,835	77,835	-	1,440	(1,440)
Twin Valley	2,816	699	32	3,547	(3,547)	-	-	-	179,830	179,830	-	3,547	(3,547)
United Assn.	411	22	9	442	(442)	-	-	-	49,914	49,914	-	442	(442)
Wamego	624	13	7	644	(644)	-	-	-	8,070	8,070	-	644	(644)
Wheat State	1,119	13	13	1,145	(1,145)	-	-	-	81,660	81,660	-	1,145	(1,145)
Wilson	129	3	1	134	(134)	-	-	-	26,167	26,167	-	134	(134)
Zenda	26	5	0	30	(30)	-	-	-	853	853	-	30	(30)
Total	\$ 400,226	\$ 34,786	\$ 4,446	\$ 439,457	\$ (411,976)	\$ -	\$ (1,356)	\$ (1,356)	\$ 2,263,150	\$ 2,261,794	\$ -	\$ 438,101	\$ (411,976)

Notes:

[1] Company does not receive KUSF support, thus, there is no corresponding KUSF offset.

[2] Reflects CAF support only. Does not include any ARC support.

Company	July 1, 2016, Intrastate Originating Revenues						July 1, 2017, Intrastate Originating Revenues						Net Change						
	End Office	L.T. - Term	L.T. - Facility	L.T. - Switching	L.T. - Other	Info	End Office	L.T. - Term	L.T. - Facility	L.T. - Switching	L.T. - Other	Info	End Office	L.T. - Term	L.T. - Facility	L.T. - Switching	L.T. - Other	Info	
Blount	12,097	\$	470	\$	-	-	13,364	\$	579	\$	480	\$	-	292	\$	12	\$	-	6
Blount	146,071	\$	2,248	\$	-	-	149,900	\$	3,271	\$	1,762	\$	-	1,690	\$	65	\$	-	34
Blount	5,590	\$	1,468	\$	7,626	\$	5,690	\$	1,497	\$	7,708	\$	-	181	\$	30	\$	-	7
Blount	28,796	\$	85	\$	130	\$	29,774	\$	87	\$	142	\$	10,983	137	\$	162	\$	-	7
Blount	156,564	\$	17	\$	10,750	\$	159,774	\$	498	\$	10,983	\$	-	2,197	\$	2	\$	-	46
Blount	8,489	\$	12	\$	30	\$	8,664	\$	13	\$	30	\$	-	154	\$	6	\$	-	2
Blount	14,041	\$	559	\$	4,243	\$	14,329	\$	570	\$	4,464	\$	-	158	\$	101	\$	-	3
Blount	5,060	\$	667	\$	-	-	5,241	\$	702	\$	-	-	-	154	\$	13	\$	-	2
Blount	99,090	\$	2,106	\$	33	\$	101,123	\$	2,241	\$	33	\$	215	112	\$	45	\$	-	1
Blount	11,090	\$	83	\$	33	\$	11,167	\$	95	\$	33	\$	-	165	\$	1	\$	-	23
Blount	14,513	\$	462	\$	568	\$	14,811	\$	472	\$	568	\$	-	165	\$	12	\$	-	3
Blount	28,021	\$	1,577	\$	303	\$	29,514	\$	1,609	\$	303	\$	-	165	\$	12	\$	-	3
Blount	18,441	\$	858	\$	2,036	\$	19,524	\$	2,070	\$	2,036	\$	-	207	\$	32	\$	-	17
Blount	29,961	\$	817	\$	1,557	\$	30,576	\$	978	\$	1,557	\$	-	207	\$	32	\$	-	17
Blount	43,245	\$	943	\$	1,956	\$	44,132	\$	962	\$	1,956	\$	-	420	\$	17	\$	-	9
Blount	8,682	\$	3,611	\$	755	\$	8,862	\$	962	\$	1,956	\$	-	486	\$	19	\$	-	10
Blount	47,031	\$	755	\$	887	\$	48,015	\$	770	\$	905	\$	-	41	\$	40	\$	-	-
Blount	43,592	\$	62	\$	70	\$	45,702	\$	66	\$	70	\$	-	897	\$	18	\$	-	19
Blount	5,497	\$	20	\$	301	\$	5,610	\$	21	\$	307	\$	-	744	\$	30	\$	-	265
Blount	4,675	\$	10	\$	10	\$	4,975	\$	10	\$	-	-	-	62	\$	6	\$	-	113
Blount	27,453	\$	1,420	\$	3,762	\$	27,453	\$	1,420	\$	3,762	\$	-	55	\$	8	\$	-	1
Blount	60,329	\$	1,138	\$	2,658	\$	61,567	\$	1,161	\$	2,714	\$	-	55	\$	8	\$	-	-
Blount	312,056	\$	221	\$	435	\$	312,056	\$	221	\$	435	\$	-	353	\$	56	\$	-	-
Blount	10,126	\$	29	\$	30	\$	10,334	\$	225	\$	444	\$	-	353	\$	56	\$	-	-
Blount	13,385	\$	159	\$	764	\$	13,660	\$	30	\$	-	-	-	353	\$	56	\$	-	-
Blount	34,080	\$	622	\$	848	\$	34,776	\$	162	\$	760	\$	-	353	\$	56	\$	-	-
Blount	22,016	\$	672	\$	848	\$	22,408	\$	686	\$	865	\$	-	353	\$	56	\$	-	-
Blount	36,261	\$	1,582	\$	6,410	\$	37,004	\$	1,614	\$	6,540	\$	-	353	\$	56	\$	-	-
Blount	12,221	\$	1,205	\$	1,070	\$	12,317	\$	1,215	\$	1,113	\$	-	353	\$	56	\$	-	-
Blount	68,008	\$	28,374	\$	28,374	\$	68,157	\$	805	\$	-	-	-	353	\$	56	\$	-	-
Blount	177,208	\$	4,752	\$	28,774	\$	178,024	\$	4,860	\$	28,976	\$	-	353	\$	56	\$	-	-
Blount	20,030	\$	824	\$	191	\$	20,440	\$	892	\$	195	\$	-	353	\$	56	\$	-	-
Blount	30,422	\$	130	\$	134	\$	31,046	\$	142	\$	136	\$	-	353	\$	56	\$	-	-
Blount	54,539	\$	509	\$	57	\$	55,659	\$	602	\$	58	\$	-	353	\$	56	\$	-	-
Blount	6,306	\$	57	\$	57	\$	6,436	\$	60	\$	-	-	-	353	\$	56	\$	-	-
Blount	1,244	\$	58	\$	159	\$	1,270	\$	59	\$	163	\$	-	353	\$	56	\$	-	-
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,363	\$	68,022	\$	14,102	\$	24,962	\$	33,636	\$	4,446
Blount	1,584,505	\$	27,229	\$	67,241	\$	1,594,731	\$	27,33										

Company	July 1, 2016, Intrastate Access Revenue						July 1, 2017, Intrastate Access Revenues						Net Change					
	End Office	LT - Term	LT - Facility	LT - Tandem Switching	LT - Other Transport	Total	End Office	LT - Term	LT - Facility	LT - Tandem Switching	LT - Other Transport	Total	End Office	LT - Term	LT - Facility	LT - Tandem Switching	LT - Other Transport	Total
Bluestem	\$ 1,649	\$ 347	\$ 288	\$ -		\$ 2,285	\$ 1,649	\$ 347	\$ 288	\$ -		\$ 2,285	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Blue Valley	10,973	2,311	1,259	-		14,543	10,973	2,311	1,259	-		14,543	-	-	-	-	-	-
Columbus	6,667	-	-	-		6,667	6,667	-	-	-		6,667	-	-	-	-	-	-
Council Grove	5,953	2,675	13,903	-		22,531	5,953	2,675	13,903	-		22,531	-	-	-	-	-	-
Craw-Kan	28,113	118	193	14,928		43,352	28,113	118	193	14,928		43,352	-	-	-	-	-	-
Cunningham	2,424	60	95	-		2,578	2,424	60	95	-		2,578	-	-	-	-	-	-
Elkhart	1,906	628	5,336	-		7,871	1,906	628	5,336	-		7,871	-	-	-	-	-	-
FairPoint MO	598	806	720	-		2,123	598	806	720	-		2,123	-	-	-	-	-	-
Golden Belt	11,110	2,378	-	-		13,487	11,110	2,378	-	-		13,487	-	-	-	-	-	-
Gorham	2,150	215	85	544		2,993	2,150	215	85	544		2,993	-	-	-	-	-	-
H & B Comm	2,656	1,647	1,330	-		5,633	2,656	1,647	1,330	-		5,633	-	-	-	-	-	-
Haviland	17,973	3,785	726	-		22,484	17,973	3,785	726	-		22,484	-	-	-	-	-	-
Home	7,168	3,221	7,648	-		18,037	7,168	3,221	7,648	-		18,037	-	-	-	-	-	-
JBN	8,696	1,831	351	-		10,878	8,696	1,831	351	-		10,878	-	-	-	-	-	-
KanOkla	3,842	809	1,678	-		6,330	3,842	809	1,678	-		6,330	-	-	-	-	-	-
LaHarpe	4,397	-	-	-		4,397	4,397	-	-	-		4,397	-	-	-	-	-	-
Madison	1,352	-	10	-		1,362	1,352	-	10	-		1,362	-	-	-	-	-	-
MoKan	7,731	1,628	1,812	-		11,171	7,731	1,628	1,812	-		11,171	-	-	-	-	-	-
Moundridge	7,833	433	492	-		8,758	7,833	433	492	-		8,758	-	-	-	-	-	-
Mutual	1,767	64	934	-		2,764	1,767	64	934	-		2,764	-	-	-	-	-	-
Peoples	4,998	954	-	-		5,952	4,998	954	-	-		5,952	-	-	-	-	-	-
Pioneer	17,103	3,661	13,282	6,882		40,928	17,103	3,661	13,282	6,882		40,928	-	-	-	-	-	-
Rainbow	4,736	863	2,016	-	180	7,794	4,736	863	2,016	-	180	7,794	-	-	-	-	-	-
Rural	29,576	-	-	-	29,459	59,035	29,576	-	-	-	29,459	59,035	-	-	-	-	-	-
S & A	2,773	584	1,149	-		4,506	2,773	584	1,149	-		4,506	-	-	-	-	-	-
S & T	5,718	1,204	159	-		7,082	5,718	1,204	159	-		7,082	-	-	-	-	-	-
South Central	3,972	143	688	-		4,803	3,972	143	688	-		4,803	-	-	-	-	-	-
Southern KS	13,483	1,193	1,503	-		16,179	13,483	1,193	1,503	-		16,179	-	-	-	-	-	-
Sunflower	6,049	1,274	5,161	-		12,484	6,049	1,274	5,161	-		12,484	-	-	-	-	-	-
Totah (2)	2,905	1,685	2,233	-		6,823	2,905	1,102	1,459	-		5,467	-	(582)	(774)	-	-	(1,356)
Tri-County	7,076	-	-	-	390	7,466	7,076	-	-	-	390	7,466	-	-	-	-	-	-
Twin Valley	14,296	-	-	-		14,296	14,296	-	-	-		14,296	-	-	-	-	-	-
United Assn	9,384	1,976	432	-		11,793	9,384	1,976	432	-		11,793	-	-	-	-	-	-
Wamego	10,815	486	468	1,225		12,994	10,815	486	468	1,225		12,994	-	-	-	-	-	-
Wheat State	8,252	873	84	-		9,209	8,252	873	84	-		9,209	-	-	-	-	-	-
Wilson	3,046	104	20	-		3,170	3,046	104	20	-		3,170	-	-	-	-	-	-
Zenda	347	156	430	-		932	347	156	430	-		932	-	-	-	-	-	-
Total	\$ 279,490	\$ 38,113	\$ 64,485	\$ 23,579	\$ 30,029	\$ 435,695	\$ 279,490	\$ 37,530	\$ 63,711	\$ 23,579	\$ 30,029	\$ 434,339	-	(582)	(774)	-	-	(1,356)

July 1, 2016 Intrastate Access Rates					July 1, 2016, Interstate Rates				TERMINATING MOU (Docket 16-587)			
Company	End Office	LT-Term	LT-FACILITY	LT-Tandem Switching / Other	End Office	LT-Term	LT-Facility	LT-Tandem Switching / Other	End Office	LT-Term	LT-Facility	LT-Tandem Switching
Bluestem	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Blue Valley	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Columbus	0.005000	-	-	-	0.005000	-	-	-				
Council Grove	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Craw-Kan	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Cunningham	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Elkhart	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
FairPoint MO	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Golden Belt	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Gorham	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
H & B Comm	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Haviland	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Home	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
JBN	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
KanOkla	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
LaHarpe	0.005000	-	-	-	0.005000	-	-	-				
Madison	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
MoKan	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Moundridge	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Mutual	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Peoples	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Pioneer	0.005000	0.000795	0.000153	0.002012	0.005000	0.000795	0.000153	0.002012				
Rainbow	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Rural	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
S & A	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
S & T	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
South Central	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Southern KS	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Sunflower	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Total (2)	0.005000	0.001053	0.000202	0.002655	0.005000	0.000689	0.000122	0.001736				
Tri-County	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Twin Valley	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
United Assn	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Wamego	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Wheat State	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Wilson	0.005000	0.001053	0.000202	0.002655	0.005000	0.001053	0.000202	0.002655				
Zenda	0.005000	0.002247	0.000433	0.005668	0.005000	0.002247	0.000433	0.005668				
Total	0.005000	0.001441	0.000277	0.003634	0.005000	0.001431	0.000275	0.003609				

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

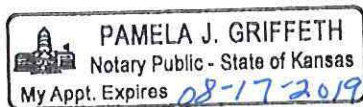
VERIFICATION


Sandra Reams, being duly sworn upon her oath deposes and says that she is Assistant Chief of Telecommunications for the State Corporation Commission of the State of Kansas, that she has read and is familiar with the foregoing *Direct Testimony* and that the statements contained therein are true and correct to the best of her knowledge, information and belief.



Sandra Reams, Assistant Chief of Telecommunications
State Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 21st day of September, 2016.




Notary Public

My Appointment Expires:

August 17, 2019

CERTIFICATE OF SERVICE

16-GIMT-587-GIT

I, the undersigned, certify that a true and correct copy of the above and foregoing Direct Testimony of Sandra Reams was served by electronic service on this 21st day of September, 2016, to the following:

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/s/ Pamela Griffeth

Pamela Griffeth
Administrative Specialist

* Denotes those receiving the Confidential version