

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

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

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 25-GIMT-332-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

ORDER OPENING DOCKET

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

1. The Federal Communications Commission (“FCC”), in its *USF/ICC Transformation Order & FNPRM*, requires Eligible Telecommunications Carriers (ETCs) to submit specific information as outlined in 47 C.F.R. § 54.313, to the states, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1 of each year, beginning in the year 2012.¹

2. The Commission finds this docket should be opened to collect those filings, as required by the FCC, and to determine whether the Commission should certify that the ETCs in Kansas will use their federal Universal Service Fund (USF) support for 2026 in compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and whether the ETCs appropriately

¹ *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, (May 14, 2012), ¶ 10.*

used their federal USF and Kansas Universal Service Fund (KUSF) support in 2024. States that desire ETCs to receive support pursuant to the USF high-cost program must file an annual certification with the FCC and USAC by October 1, stating that all federal high-cost support provided to such carriers within the state was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support was intended as required by 47 C.F.R. § 54.314.

3. Commission Staff (“Staff”) prepared a Report and Recommendation, dated March 3, 2025, which is attached hereto and made a part hereof by reference. The Report and Recommendation addresses the above stated matters and requests the Commission open this docket. The Commission approves Staff’s Report and Recommendation and adopts the request.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. This docket shall be opened for the purpose of receiving information and certifications to ensure compliance with 47 U.S.C. § 254(e) and to ensure appropriate use of federal USF and KUSF support.

B. ETC’s shall file their ETC certifications, along with the attached worksheet(s), with the Commission in this docket on or before June 30, 2025. ETC shall refer to Staffs R&R to determine which filings need to be made by which entities and how to report the information. ETCs shall email copies of the supporting Excel files for Attachments 2–4 to steve.garrett@ks.gov and hemant.bhagat@ks.gov, concurrent with the filing in the docket. The annual "ETC Certification Files" may be downloaded from the Commission's website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>. ETCs are reminded that late or incomplete filings may result in fines or penalties.

C. ETCs that received high-cost KUSF support in 2024 should use the Annual Total amount of support listed for the carrier on Staff Exhibit 1. If an ETC believes it should report a

different number, it should contact Staff to discuss the matter. If an ETC reports a different number, it needs to explain why the different amount was used and why it differs from the amount on Staff Exhibit 1.

D. ETCs are to certify all federal high-cost support receipts, therefore, to ensure Staff's review and the Commission's decisions regarding certification meet the obligation to certify all federal high-cost support, an ETC should report all federal high-cost support (i.e., ACAM) and not allocate its federal high-cost support. Staff's review and recommendations regarding ETC certification take into consideration that federal high-cost support may be provided for both voice and broadband services.

E. ETCs are reminded that any information they seek to file confidentially must comply with K.A.R. 82-1-221a. This includes K.A.R. 82-1-221a(a)(5)'s requirement of a written explanation explaining whether the information constitutes a trade secret or confidential commercial information, and an explanation regarding the harm or potential harm disclosure would cause. Failure to comply with such regulation may result in a penalty or public disclosure of information

F. 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).²

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 03/11/2025



Abigail D. Emery
Acting Secretary to the Commission

BWB

² K.S.A. 66-118b; K.S.A. 77-503(c); and K.S.A. 77-531(b).

EXHIBIT A



1500 SW Arrowhead Road
Topeka, KS 66604-4027

Phone: 785-271-3100
Fax: 785-271-3354
<http://kcc.ks.gov/>

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

Laura Kelly, Governor

REPORT AND RECOMMENDATION UTILITIES DIVISION

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

FROM: Steve Garrett, Deputy Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: March 3, 2025

SUBJECT: Docket No. 25-GIMT-332-GIT

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support.

EXECUTIVE SUMMARY:

The Federal Communications Commission (FCC) requires Eligible Telecommunications Carriers (ETCs) to submit specific information, set forth in 47 C.F.R. § 54.313, to the States, the Universal Service Administrative Company (USAC), tribal governments (where relevant), and the FCC by July 1st of each year.¹ In addition, pursuant to 47 C.F.R. § 54.314 and 47 U.S.C. § 254(e), States that desire to have ETCs in their state receive funding pursuant to the federal high-cost program must file an annual certification with USAC and the FCC. This filing states that all federal high-cost support provided to such carriers within Kansas was used in the preceding calendar year and will be used in the following calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

Staff recommends the Commission open a docket to collect the required filings by the ETCs and to determine whether the Commission should provide the aforementioned federal high-cost certification letter to the FCC and USAC. An ETC should also include a certification and information to ensure its Kansas Universal Service Fund (KUSF) support was used in the preceding calendar year (2024) and will be used in the coming calendar year (2026) appropriately.

¹ Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Third Order on Reconsideration, (May 14, 2012), ¶ 10.

Each company must submit a separate filing, with a copy of the supporting Excel files for Attachments 2 - 4, emailed to Staff at steve.garrett@ks.gov and hemant.bhagat@ks.gov, concurrent with the filing. The annual “ETC Certification Files” are available for download on the Commission’s website at the following web address: <https://kcc.ks.gov/telecommunications/service-provider-forms>. **Carriers should be reminded that late or incomplete filings may result in fines or penalties.**

BACKGROUND:

The Federal Telecommunications Act, § 254(e), requires that carriers receiving federal high-cost support shall use the support “*only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.*” (Emphasis added). The FCC delegated responsibility for oversight of § 254(e) to the States. The certification letter to the FCC and USAC, due no later than October 1, 2025.

For Kansas high-cost ETCs to be eligible to receive federal high-cost support in 2026. The Commission must send a letter to the FCC and USAC stating each ETC named in its letter provided certification that it used its federal high-cost support in the prior year (2024) and will use its federal high-cost support in the following year (2026) in accordance with § 254(e). Specifically, § 54.314(a), states,

States that desire eligible telecommunications carriers to receive support pursuant to the high-cost program must file an annual certification with the Administrator and the Commission stating that *all federal high-cost support* provided to such carriers within that State was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. High-cost support shall only be provided to the extent that the State has filed the requisite certification pursuant to this section. [Emphasis added].

Carriers are to certify all federal high-cost support receipts,² therefore, to ensure Staff’s review and the Commission’s decisions regarding certification meet the obligation to certify *all* federal high-cost support, an ETC should report all federal high-cost support (i.e. ACAM) and not allocate its federal high-cost support. Staff’s review and recommendations regarding ETC certification take into consideration that federal high-cost support may be provided for both voice and broadband services.

For KUSF support certification purposes, the Commission requires an ETC provide information documenting that it appropriately spent its KUSF support and will continue to spend its KUSF support appropriately.³

² Federal high-cost support includes: legacy support, safety valve support, Connect America Cost Model support, Connect America Fund support, Alternative Connect America Model support, Rural Broadband Experiment support, and Rural Digital Opportunity Fund support. Any ETC that will receive RDOF support in 2024 and/or 2025 must certify the receipt and use of the support.

³ Order Adopting Staff Workshop Report and Issue Resolutions and Soliciting Additional Comments, Docket No. 08-GIMT-154-GIT, Jan. 30, 2009.

ANALYSIS:

Kansas ETC Certification Forms

The Forms and Instructions ETCs will use to certify their Federal and Kansas high-cost support are as follow:

**Attachment
No.**

Description

1	Certification Form for federal High-Cost and KUSF Support
2a	Kansas' Test for Certification for Incumbent Local Exchange Carriers (ILECs)
2b	Kansas' Test for Certification for ILECs - Illustrative Data
3a	Kansas' Test for Certification for Competitive ETCs
3b	Kansas' Test for Certification for Competitive ETCs - Illustrative Data
4	Narrative Report for New Investments
5	Additional ETC Requirements Adopted in Docket No. 06-GIMT-446-GIT
6	Certification Instructions

Attachment 6 contains the Instructions for completing Attachments 1-5.

- ILECs that received in 2024 and/or will receive federal high-cost support and/or KUSF support in 2026 should complete Attachments 1, 2a, 4, and 5.
- Competitive ETCs that received high-cost support in 2024 and/or will receive federal high-cost support in 2026 need to complete Attachments 1, 3a, 4, and 5.
- Lifeline-Only ETCs need to complete only Attachment 5.

Attachments 2b and 3b are provided for illustration purposes only to assist in the completion of the cost reports in 2a and 3a. Additionally, since Competitive ETCs are eligible to receive federal high-cost support in Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T) exchanges, a Competitive ETC will need to include and certify any federal high-cost support received for AT&T's exchange on Attachments 3a and 4.⁴

Staff notes that in the past,⁵ many ETCs reported the net amount of KUSF received after deducting its assessments owed to the Fund. An ETC's statutory requirement to contribute to the KUSF is separate and distinct from its Kansas high-cost support and, therefore, the gross amount of KUSF support received should be reported on Attachments 2a and 3a.

Staff Exhibit 1 includes the amount of high-cost KUSF support disbursed to each ETC in 2024. This amount should be reported as the amount of KUSF high-cost support received in 2024. If the carrier believes a different amount should be reported, it should contact Staff.

⁴ The Commission's Order, Docket No. 07-GIMT-498-GIT, dated Aug. 9, 2007, reaffirmed its previous decision not to certify competitive ETCs' expenditures and investments of federal legacy high-cost support in non-supported areas, which were areas served by AT&T, except to the extent the competitive ETCs can justify an allocation of a portion of expenditures and investments of federal high-cost support to serve a supported area. The federal high-cost Connect America Fund and Rural Digital Opportunity Fund provide support specifically for census blocks in AT&T's and Brightspeed's service area; therefore, expenses and investments related to that funding must be reported.

⁵ See Docket No. 18-GIMT-394-ETC.

RECOMMENDATION:

Staff recommends the Commission open a docket to collect the required filings and to determine whether the Commission should certify to the FCC and USAC that all federal high-cost support provided to ETCs in Kansas was used in the preceding calendar year (2024) and will be used in the coming calendar year (2026) in accordance with Section 254(e). The docket should further include a certification and analysis to ensure KUSF support was used in 2024 and will be used in 2026 appropriately.

Staff further recommends all ETCs download the annual “ETC Certification Files” that are available on the Commission’s website at the following web address: <https://kcc.ks.gov/telecommunications/service-provider-forms>. Staff recommends the Commission require ETCs and competitive ETCs to submit their ETC certifications and the required worksheets, on or before Monday, June 30, 2025. Each company is expected to submit a separate filing, with Attachments, and email a copy of the supporting Excel files, for Attachments 2-4 to steve.garrett@ks.gov and hemant.bhagat@ks.gov. **Carriers should be reminded that late or incomplete filings may result in fines or penalties.**

KUSF High-Cost Support Paid to ETCs
January - December 2024
(Annual total should match amount reported. Include explanation for any variance)

Company	Jan. - Dec. 2024 Annual Total (A = B + C + D)	Jan - Feb. 2024 Total (FY 27) (B)	March 2024 Total (FY 28) (C)	April - May 2024 Total (FY 28)	June - Dec. 24 Total (FY 27) (D)
Blue Valley	\$ 1,363,821	\$ 237,443	\$ 118,740	\$ 225,054	\$ 782,584
Columbus	310,105	53,991	26,999	51,172	177,942
Consolidated Communications of Kansas (1)	-	-	-	-	-
Consolidated Communications of Missouri (2)	-	-	-	-	-
Craw-Kan	3,882,287	675,919	338,008	640,642	2,227,718
Cunningham	730,827	127,241	63,629	120,598	419,360
Elkhart	-	-	-	-	-
Golden Belt	1,496,158	260,451	130,259	246,899	858,550
Gorham	466,722	81,259	40,635	77,017	267,812
H & B	581,434	101,230	50,622	95,946	333,636
Haviland	-	-	-	-	-
Home	464,400	80,834	40,435	76,638	266,494
JBN	516,952	90,003	45,008	85,306	296,635
KanOkla	579,436	100,881	50,448	95,617	332,490
LaHarpe	-	-	-	-	-
Madison	190,666	33,196	16,600	31,463	109,407
Mokan	-	-	-	-	-
Moundridge	-	-	-	-	-
Mutual	184,445	32,113	16,058	30,436	105,837
Peoples	410,831	71,528	35,769	67,794	235,741
Pioneer	3,009,075	523,896	261,982	496,547	1,726,651
Rainbow	655,540	114,130	57,074	108,176	376,160
Rural	2,228,147	387,932	193,991	367,681	1,278,543
S & A	292,395	50,907	25,457	48,250	167,781
S & T	997,076	173,596	86,809	164,534	572,137
South Central	1,364,688	33,648	16,827	293,527	1,020,687
Southern Kansas	1,006,323	175,201	87,615	166,061	577,446
Total	311,222	34,442	17,223	32,644	226,913
Tri-County	1,114,624	194,061	97,044	183,931	639,588
Tri-County - Council Grove	814,352	141,782	70,901	134,382	467,288
Twin Valley	2,950,742	513,740	256,903	486,920	1,693,179
United Telephone Assoc.	1,348,702	234,816	117,423	222,558	773,905
Wamego	1,346,460	234,426	117,228	222,188	772,618
Wheat State	515,002	89,662	44,838	84,984	295,517
Wilson	616,804	107,389	53,701	101,783	353,931
Zenda	251,554	43,797	21,901	41,510	144,345
Brightspeed of Kansas (3)	6,222,180	1,182,990	503,919	1,007,838	3,527,433
	<u>\$ 36,222,969</u>	<u>\$ 6,182,503</u>	<u>\$ 3,004,046</u>	<u>\$ 6,008,094</u>	<u>\$ 21,028,326</u>

Notes:

- (1) Effective January 1, 2019, Bluestem Telephone and Sunflower Telephone Company's names were changed to Consolidated Communications of Kansas, Docket No. 19-SFLT-197-CCN.
- (2) FairPoint-MO changed its name to Consolidated Communications of Missouri, effective January 1, 2019. Docket No. 19-FCMT-161-CCN.
- (3) Reflects KUSF support paid to Brightspeed. Includes prior year KUSF & CAF Support adjustments paid during the year. Docket No. 16-GIMT-511-GIT

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. 25-GIMT-332-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 _____ of
_____ (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 _____ (Company/Cooperative) to the statements
made in this certification.

2. _____ (Company/Cooperative) was named as
an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal
support purposes in Docket No. _____ by order dated
_____ and KUSF support purposes in Docket No. _____ by order
dated _____.

**Docket No. 25-GIMT-332-GIT
Attachment 1**

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 _____ (Company/Cooperative) was used in the proceeding calendar year **2024** and will be used in the new calendar year **2026** *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

Printed/Typed Name

Executed on _____ date.

Email address: _____

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

25-GIMT-332-GIT
Attachment 2a

Company Name: _____		
	DATA YEAR:	<u>2024</u>
	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	
2. Category 1.3 Loops	(070)	
3. Consumer Broadband-only Loops	(090)	
 INVESTMENT** Remove all BLS only investments		
1. Plant Accounts		
a. Acct 2001 - Telephone Plant in Service	(160)	
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	
b. Acct 2220 - Operator System Equipment	(235)	
c. Acct 2230 - Central Office Transmission	(240)	
d. Total Central Office Equip	(245)	\$ -
e. Circuit Equip Cat 4.13	(250)	
f. Acct 2410 - Cable & Wire Facilities Total	(255)	
 AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 - Tangible Assets	(800)	\$ -
Acct. 2680 (2230) - Central Office Transmission	(805)	
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	
Acct. 2680 (2410) Cable & Wire Facilities	(815)	
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	
Acct. 6560 (2680) Dep & Amort	(830)	
 PART 36 - COST STUDY DATA		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	
2. Cost Study Avg C&WF Cat 1	(710)	
3. C&WF CAT 1 Factor		#DIV/0!
4. COE CAT 4.13 Factor		#DIV/0!
5. Switching Factor		1.000000

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

25-GIMT-332-GIT
Attachment 2a

Company Name: _____

DATA YEAR: 2024

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

INVESTMENT, EXPENSE AND TAXES**		REGULATED
Remove all BLS only amounts	LINE	AMOUNT

1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 - Cable & Wire Facilities Total	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	
b. Acct 6110 - Network Support Benefits	(340)	
c. Acct 6110 - Network Support Rents	(345)	
d. Acct 6120 - General Support Total	(350)	
e. Acct 6120 - General Support Benefits	(355)	
f. Acct 6120 - General Support Rents	(360)	
g. Acct 6210 - Central Office Switching Total	(365)	
h. Acct 6210 - Central Office Switching Benefits	(370)	
i. Acct 6210 - Central Office Switching Rents	(375)	
j. Acct 6220 - Operator Systems Total	(380)	
k. Acct 6220 - Operator Systems Benefits	(385)	
l. Acct 6220 - Operator Systems Rents	(390)	
m. Acct 6230 - Central Office Transmission Total	(395)	
n. Acct 6230 - Central Office Transmission Benefits	(400)	
o. Acct 6230 - Central Office Transmission Rents	(405)	
p. Total - Central Office (Acct. 6210 - 6230)	(410)	\$ -
q. Acct 6410 - Cable & Wire Facilities	(430)	
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	
t. Total Plant Specific Expense (Accts. 6110 - 6410)	(445)	\$ -
3. Expenses - Plant Non Specific Exp		
a. Acct 6530 - Network Operations	(450)	
b. Acct 6530 - Network Operations Benefits	(455)	
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210) - Central Office Switching	(510)	
b. Acct 6560 (#2220) - Operator Systems	(515)	
c. Acct 6560 (#2230) - Central Office Transmission	(520)	
d. Acct 6560 (#2210-2230) - Total	(525)	\$ -
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)	
5. Corporate Operating Expenses		
a. Acct 6710 - Executive & Planning	(535)	
b. Acct 6710 - Executive & Planning Benefits	(540)	
c. Acct 6720 - General Admin	(550)	
d. Acct 6720 - General Admin Benefits	(555)	
e.Total Corporate Operating Expense		\$ -
(line 535+550)	(565)	
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	
b. Rents Portion	(610)	-
Total Expenses (Excluding Depreciation)		\$ -
7. Operating Taxes		
a. Acct 7200	(650)	

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

25-GIMT-332-GIT
Attachment 2a

Company Name: _____	
DATA YEAR: 2024	
Test for use of FUSF & KUSF	
CAPITAL:	
1. Category 1 C&WF	#DIV/0!
2. Category 4.13 COE and Switching	#DIV/0!
MAINTENANCE:	
3. CWF - MAINT. EXP.	#DIV/0!
4. COE - MAINT. SW	-
5. COE - MAINT-OP SYSTEM	-
6. COE - MAINT. - TRANS.	#DIV/0!
7. CWF - NETWORK SUPPORT	#DIV/0!
8. COE - NETWORK SUPPORT	#DIV/0!
9. CWF GENERAL SUPPORT	#DIV/0!
10. COE GENERAL SUPPORT	#DIV/0!
20. CWF NETWORK OPERATION	#DIV/0!
21. COE NETWORK OPERATION	#DIV/0!
22. CWF EXEC. & PLANNING	#DIV/0!
23. COE EXEC. & PLANNING	#DIV/0!
24. CWF GENERAL ADMIN.	#DIV/0!
25. COE GENERAL ADMIN.	#DIV/0!
26. CWF OPERATING TAXES	#DIV/0!
27. COE OPERATING TAXES	#DIV/0!
28. CWF BENEFITS - TTL OPER EXP	#DIV/0!
29. COE BENEFITS - TTL OPER EXP	#DIV/0!
30. CWF RENTS - TTL OPER EXP	#DIV/0!
31. COE RENTS - TTL OPER EXP	#DIV/0!

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

25-GIMT-332-GIT
Attachment 2a

Company Name: _____			
DATA YEAR: 2024			
A. Total Cash Expenditures Associated with USF	#DIV/0!		
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	\$	-	
<hr style="border-top: 3px double #000;"/>			
C. Gross KUSF Receipts (do not deduct KUSF assessments paid)	\$	-	
<hr style="border-top: 3px double #000;"/>			
D. Total FUSF and KUSF Receipts	\$	-	
<hr style="border-top: 3px double #000;"/>			
E. Do Expenditures Exceed FUSF Receipts?	#DIV/0!		
Amount Expenditures Exceed Certified FUSF <i>(negative number means FUSF exceeds Expenditures)</i>	#DIV/0!		[A - B8]
F. Do Expenditures Exceed FUSF & KUSF Receipts? Amount Expenditures Exceed Certified FUSF & KUSF <i>(negative number means FUSF & KUSF exceeds Expenditures)</i>	#DIV/0!	#DIV/0!	[A - D]
 Please provide the following information:			
	Contact:	_____	
	Title:	_____	
	Phone No.:	_____	
	E-Mail:	_____	

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

**25-GIMT-332-GIT
Attachment 2b**

Company Name: ABC Telephone Company Inc.

	DATA YEAR	<u>2024</u>
	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	9,552
2. Category 1.3 Loops	(070)	9,262
3. Consumer Broadband-only Loops	(090)	500
INVESTMENT** Remove all BLS only investments		
1. Plant Accounts		
a. Acct 2001	(160)	\$ 26,978,955
2. Selected Plant Accounts		
a. Acct 2210 - Central Office Switching	(230)	5,247,838
b. Acct 2220 - Operator System Equipment	(235)	0
c. Acct 2230 - Central Office Transmission	(240)	5,962,811
d. Total Central Office Equip	(245)	\$ 11,210,649
e. Circuit Equip Cat 4.13	(250)	4,061,618
f. Acct 2410 - Cable & Wire Facilities Total	(255)	13,819,015
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 - Tangible Assets	(800)	0
Acct. 2680 (2230) - Central Office Transmission	(805)	0
Acct. 2680 (2230) - Cat. 4.13 Central Office Transmission	(810)	0
Acct. 2680 (2410) Cable & Wire Facilities	(815)	0
Acct. 2680 (2410) - Cable & Wire Facilities - Cat 1	(820)	0
Acct. 6560 (2680) Dep & Amort	(830)	0
PART 36 - COST STUDY DATA		
1. Acct. 2410 - Cost Study Avg C&WF	(700)	11,811,817
2. Cost Study Avg C&WF Cat 1	(710)	11,718,782
3. C&WF CAT 1 Factor		0.992124
4. COE CAT 4.13 Factor		0.362300
5. Switching Factor		1.000000

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

**25-GIMT-332-GIT
Attachment 2b**

Company Name: ABC Telephone Company Inc.

DATA YEAR 2024
REGULATED
LINE AMOUNT

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

INVESTMENT, EXPENSE AND TAXES**

Remove all BLS only amounts

	LINE	REGULATED AMOUNT
1. Selected Plant Accounts		
a. Acct 2230 - Central Office Transmission	(240)	198,228
b. Total Central Office Equip	(245)	480,061
c. Acct 2410 - Cable & Wire Facilities Total	(255)	436,274
2. Expenses - Plant Specific Exp		
a. Acct 6110 - Network Support Total	(335)	12,628
b. Acct 6110 - Network Support Benefits	(340)	1,362
c. Acct 6110 - Network Support Rents	(345)	256
d. Acct 6120 - General Support Total	(350)	211,447
e. Acct 6120 - General Support Benefits	(355)	8,068
f. Acct 6120 - General Support Rents	(360)	15,114
g. Acct 6210 - Central Office Switching Total	(365)	236,427
h. Acct 6210 - Central Office Switching Benefits	(370)	36,157
i. Acct 6210 - Central Office Switching Rents	(375)	2,922
j. Acct 6220 - Operator Systems Total	(380)	0
k. Acct 6220 - Operator Systems Benefits	(385)	0
l. Acct 6220 - Operator Systems Rents	(390)	0
m. Acct 6230 - Central Office Transmission Total	(395)	108,923
n. Acct 6230 - Central Office Transmission Benefits	(400)	14,821
o. Acct 6230 - Central Office Transmission Rents	(405)	1,222
p. Total - Central Office (Acct. 6210 - 6230)	(410)	\$ 345,350
q. Acct 6410 - Cable & Wire Facilities	(430)	882,320
r. Acct 6410 - Cable & Wire Facilities Benefits	(435)	124,429
s. Acct 6410 - Cable & Wire Facilities Rents	(440)	63,079
t. Total Plant Specific Expense (Accts. 6110 - 6410)	(445)	\$ 1,451,745
3. Expenses - Plant Non Specific Exp		
a. Acct 6530 - Network Operations	(450)	287,767
b. Acct 6530 - Network Operations Benefits	(455)	45,519
4. Depreciation & Amortization Exp		
a. Acct 6560 (#2210) - Central Office Switching	(510)	382,435
b. Acct 6560 (#2220) - Operator Systems	(515)	0
c. Acct 6560 (#2230) - Central Office Transmission	(520)	297,063
d. Acct 6560 (#2210-2230) - Total	(525)	679,498
e. Acct 6560 (#2410) - Cable & Wire Facilities	(530)	677,375
5. Corporate Operating Expenses		
a. Acct 6710 - Executive & Planning	(535)	73,579
b. Acct 6710 - Executive & Planning Benefits	(540)	17,078
c. Acct 6720 - General Admin	(550)	428,472
d. Acct 6720 - General Admin Benefits	(555)	46,933
e. Total Corporate Operating Expense (line 535+550)	(565)	\$ 502,051
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	425,974
b. Rents Portion	(610)	82,594
Total Expenses (Excluding Depreciation)		\$ 2,241,563
7. Operating Taxes		
a. Acct 7200	(650)	1,073,834

**Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification**

25-GIMT-332-GIT
Attachment 2b

Company Name: <u>ABC Telephone Company Inc.</u>	
DATA YEAR <u>2024</u>	
LINE	REGULATED AMOUNT
Test for use of FUSF and KUSF	
CAPITAL:	
1. Category 1 C&WF	432,838
2. Category 4.13 COE and Switching	455,759
MAINTENANCE:	
3. CWF - MAINT. EXP.	689,340
4. COE - MAINT. SW	197,348
5. COE - MAINT-OP SYSTEM	0
6. COE - MAINT. - TRANS.	63,266
7. CWF - NETWORK SUPPORT	5,595
8. COE - NETWORK SUPPORT	3,799
9. CWF GENERAL SUPPORT	95,673
10. COE GENERAL SUPPORT	64,963
20. CWF NETWORK OPERATION	123,106
21. COE NETWORK OPERATION	83,591
22. CWF EXEC. & PLANNING	28,713
23. COE EXEC. & PLANNING	19,496
24. CWF GENERAL ADMIN.	193,891
25. COE GENERAL ADMIN.	131,655
26. CWF OPERATING TAXES	545,701
27. COE OPERATING TAXES	370,541
28. CWF BENEFITS - TTL OPER EXP	216,472
29. COE BENEFITS - TTL OPER EXP	146,988
30. CWF RENTS - TTL OPER EXP	41,973
31. COE RENTS - TTL OPER EXP	28,500

Example
Incumbent ETC Investment and Expense
Kansas Test for USF Certification

25-GIMT-332-GIT
Attachment 2b

Company Name: <u>ABC Telephone Company Inc.</u>			
		DATA YEAR <u>2024</u>	
	LINE	REGULATED AMOUNT	
A. Total Cash Expenditures Assd with USF		\$ 3,939,208	
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)		2,000,000	
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		<u>\$ 2,000,000</u>	
C. Gross KUSF Receipts (do not deduct KUSF assessments paid)		1,000,000	
D. Total FUSF and KUSF Receipts		<u>\$ 3,000,000</u>	
E. Do Expenditures Exceed FUSF Receipts?		Yes	
Amount Expenditures Exceed Certified FUSF		\$ 1,939,208	[A - B8]
<i>(negative number means FUSF exceeds Expenditures)</i>			
F. Do Expenditures Exceed FUSF & KUSF Receipts?		Yes	
Amount Expenditures Exceed Certified FUSF & KUSF		939,208	[A - D]
<i>(negative number means FUSF & KUSF exceeds Expenditures)</i>			
Please provide the following information:			
		Contact: <u>John Smith</u>	
		Title: <u>Accountant</u>	
		Phone No.: <u>785-555-1234</u>	
		E-Mail: <u>jsmith@wtci.com</u>	

**Competitive ETC Investment and Expense
Test for USF Certification**

25-GIMT-332-GIT
Attachment 3a

Company Name : _____

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R.§ 54.314 and KCC Requirements. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at steve.garrett@ks.gov and hemant.bhagat@ks.gov.

Data Year	2024
------------------	-------------

	AMOUNT FOR KANSAS A	ALLOCATION PERCENT B	FUSF CODE (see Notes) C	AMOUNT FOR FUSF AREAS
				(INCLUDE SVBT/AT&T Area if support is received for the area) D=AxB
FUSF WORKING LOOPS/LINEAverage No. Customers				
<u>NEW INVESTMENTS:</u>				
1. SWITCHING				-
2.OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)				-
SUBTOTAL NEW INVESTMENTS	\$ -			\$ -
<u>EXPENSES:</u>				
3. SWITCH MAINTENANCE				-
4. OUTSIDE PLANT MAINTENANCE				-
5. NETWORK SUPPORT				-
6. ADMINISTRATIVE EXPENSE				-
SUBTOTAL EXPENSES	\$ -			\$ -
A. TOTAL CASH EXPENDITURES ASSD WITH USF	\$ -			\$ -
<u>B. CERTIFIED FUSF RECEIPTS FOR CETCS</u>				
B1. Frozen High Cost Support				\$ -
B2. Mobility Fund Support				
B3. Rural Broadband Experiments Fund				
B4. CAF II Support				
B5. Rural Digital Opportunity Fund				
B5. Total Certified Federal USF Receipts	\$ -			\$ -
C. DO EXPENDITURES EXCEED FUSF RECEIPTS?	No		No	\$ -
<i>(negative number means FUSF exceeds Expenditures)</i>				

Notes:
 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
 2) Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
 a. Based on number of switched MOUs from USF supported cell sites.
 b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site.
 (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
 c. Based on percent of USF served areas to all areas.

Contact Name: _____ Title: _____

Phone No.: _____ E-Mail: _____

Example
CETC Investment and Expense
Test for USF Certification

25-GIMT-332-GIT
Attachment 3b

Company Name : Everyday Telephone Company, Inc.

All CETCs must complete this form to receive certification for its use of FUSF support, pursuant to 47 C.F.R. § 54.314 and KCC Requirements. If your Company does not have "lines/loops", please provide the average number of customers for the year. Please attach additional pages, if necessary. If you have any questions, please email the KCC Staff at steve.garrett@ks.gov and hemant.bhagat@ks.gov.

Data Year **2024**

	AMOUNT FOR KANSAS	ALLOCATION PERCENT	CODE (see Notes)	FUSF AMOUNT FOR FUSF AREAS <small>(INCLUDE SWBT/AT&T Area if support is received for the area)</small> D=AxB
	A	B	C	D=AxB
FUSF WORKING LOOPS/LINES/CUSTOMERS	50,000	N/A		17,500
NEW INVESTMENTS:				
1. SWITCHING	5,000,000	35.00%	a	1,750,000
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)	7,000,000	62.00%	b	4,340,000
SUBTOTAL NEW INVESTMENTS [Should equal new investments, Attachment 4]	12,000,000			6,090,000
EXPENSES:				
3. SWITCH MAINTENANCE	1,500,000	75.00%	a	1,125,000
4. OUTSIDE PLANT MAINTENANCE	4,000,000	52.00%	c	2,080,000
5. NETWORK SUPPORT	500,000	52.00%	c	260,000
6. ADMINISTRATIVE EXPENSE	400,000	75.00%	a	300,000
SUBTOTAL EXPENSES	6,400,000			3,765,000
A. TOTAL CASH EXPENDITURES ASSD WITH USF	18,400,000			9,855,000
B. CERTIFIED FUSF RECEIPTS FOR CETCS				
B1. Frozen High Cost Support	\$ 83,500	100%		83,500
B2. Mobility Fund Support				
B3. Rural Broadband Experiments Fund				
B4. CAF II Support				
B5. Rural Digital Opportunity Fund, Phase I				
B6. Total Certified Federal USF Receipts				\$ 83,500
C. DO EXPENDITURES EXCEED FUSF RECEIPTS?				
(negative number means FUSF exceeds Expenditures)	Yes			\$ 9,771,500

Notes:

- 1) Exclude the cost of transport between switches (dial-tone and/or tandem).
- 2) Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
 - a. Based on number of switched MOUs from USF supported cell sites.
 - b. Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
 - c. Based on percent of USF served areas to all areas.

Contact: Robert Jones

Title: Accountant

Phone No.: 316-555-5555

E-Mail: rjones@edtc.com

Narrative Report for New Investments

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

Carrier Name: 0
Data Year: 2024

Supplemental
Pages

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

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)** . **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.

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

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 _____ 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 _____ of the _____
(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 _____(Company/Cooperative) to the statements made in this certification.

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

Signature

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

(If necessary, please attach additional pages.)

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

The Kansas Corporation Commission (KCC) requires every Eligible Telecommunications Carrier (ETC) to complete the ETC certification forms as part of the annual ETC certification process.

If you have any questions, please contact the Telecommunications Division at steve.garrett@ks.gov or hemant.bhagat@ks.gov.

1. Line Definitions:

Working Loops for federal High-Cost Supported Services

Provide the line counts by incumbent local exchange carrier (ILEC) study area or wire center that were reported to the Universal Service Administrative Company (USAC) for the same year as the cost data is reported. Category 1.3 loops and broadband only loops should be reported separately.

2. Attachments 2 and 3 – ILEC ETC and Competitive ETC Investment and Expense Reports

a. ILEC ETC Report Format

Attachment 2a is used by Incumbent ETCs to report their use of federal high-cost support receipts for the prior year. The report is a modified version of the cost information submitted to USAC for legacy high-cost support, with the prior year data used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually used to provide universal service in the supported areas for which the support was paid.¹ Support should be segregated by the type of federal high-cost support received. Include all federal high-cost support.

KUSF support is required to be certified and, similar to federal support, KUSF support must be used to provide and maintain universal service. **All Federal and KUSF high-cost support reported should reflect the gross amount, not the net amount received after deducting assessments owed to the Fund. Lifeline support receipts should not be included in the amount of high-cost support received. The high-cost KUSF amount listed on Staff Exhibit 1 should be reported for KUSF high-cost support.**

Attachment 2b is an example of how to complete Form 2a.

b. Competitive ETC (CETC) Report Format

Attachment 3a is used by CETCs to report their use of federal high-cost funds received in the prior year. Prior year data is used to evaluate past certifications provided by the companies. Amounts reported should reflect the amounts actually expended to provide

¹ Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required. See 2c Allocation Methods.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

universal service in the supported areas for which the support was paid.² If no universal service support was received for the prior year, the company should file a statement to that effect. Cost information is split by new investment expenditures and expenses. This is compared to the amount of federal high-cost support received. **High-cost support reported should be the gross amount, not the net amount received after deducting assessments.**

Attachment 3b is an example showing how to complete Form 3a.

The company should exclude the cost of transport between switches to ensure consistent reporting with the costs submitted by the Incumbent ETCs. Once a call leaves the local switch, it is on the interoffice network and costs for those facilities are not included. The switch is the device that provides dial tone and/or switching the call to the proper location for termination. This can be a smart remote with stand-alone capability³ or a stand-alone/host switch.

c. Allocation Methods

The cost reports attempt to capture the cost to provide universal service and exclude certain types of investments and expenses. The FCC has deregulated some services, including voice messaging and inside wire; therefore, they should be excluded.

The allocation of new investments and expenses play an important role in properly identifying the costs associated with USF supported areas. Incumbent LECs utilize a series of allocation rules via Part 36 Separations Rules that are specific and documented. However, even ILECs may encounter situations where only a portion of their territory receives high-cost support.

CETCs may serve exchanges that are supported and areas that are not supported. Some costs may be specific to the supported area, while others may involve both areas. A number of valid methods are available to make these allocations. Below is a list of examples that will normally be acceptable in making allocations:

Outside plant projects –the supported areas’ allocations can be determined as follow:

1. Identify the specific costs in supported areas and assign it as a qualified cost.
2. Determine the number of lines in the supported area versus the total lines served by the facilities. Do not include broadband-only use lines.
3. Determine the geographic area in the supported area versus the total area served (this method is especially applicable to cellular towers).
4. Calculate the percent of miles on a cable that serves a supported area versus the total miles to all the areas.

²*Ibid.*

³ A smart remote with stand-alone capability is one that can still provide local calling even if its link to the host switch is severed.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

5. Calculate the percent of fiber strands or cable pair that go to a supported area versus the total strands in service.

Expenses may be allocated based on the allocation determined for the related investment, or based on a percentage of lines or customers in the supported areas.

Maintenance expense may be allocated based on the number of items being maintained that are in the supported areas.

Switching may be allocated using the following methods:

1. Calculate the percent of Minutes of Use (MOU) for the lines in the supported area versus all minutes.
2. Calculate the percent of lines in the supported area versus all lines served by the switch.
3. Similar allocations could apply to circuit equipment used for switched access.

General rules to follow when deciding on the allocation method:

1. Allocations may be calculated by individual investment location, by region or for the whole state.
2. Companies may decide which methods work best based on the accounting and network information they have available.
3. Methods can vary for different types of investment or expense.
4. The method is one that is appropriate for the item being allocated (i.e. MOU would be appropriate for a switch allocation but not for a loop).
5. The allocation is based on measurable data.
6. The method captures a reasonable cost of the investment and/or expense.
7. The company should maintain consistency in the allocation methods used from year to year when providing data to the Commission. This will avoid gaming the system and provide the ability to make comparisons from year to year.
8. When a company changes an allocation method, it should be noted in the data submission, complete with rationale explaining why this new method is more appropriate. Also, the company should provide a calculation of what effect the new allocation would have on the prior year's report.

4. Attachment 4 - New Investments Utilizing High-Cost Support in Supported Areas

a. Report Format

For the prior calendar year, provide a description of the new investments in supported areas where the high-cost support was used. Please use a format similar to the *Narrative for New Investment Report*. The first example is for a wireless ETC and the second example is for a wireline ETC. It is acceptable to submit a mechanized report if it contains the essential information. Any projects over the threshold should be listed separately. Those projects less than the threshold should be combined into one or more line items. See 3b below for the threshold.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

EXAMPLE of Narrative for New Investment Report

EXAMPLE of a WIRELESS COMPANY

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
20 miles West of Oakley serving USF areas: Levant, Winona, and Russell Springs.	New tower and fiber trunking.	\$300,000	70%	[1]	\$210,000
Wichita - Serves all customers in Kansas.	Switch Software Upgrade.	\$250,000	25%	[2]	\$50,000
TOTAL		\$550,000			\$260,000

NOTES

- [1] Percent of the service area that is USF supported on geography served.
[2] Percent of switch that is USF supported based on lines served.

EXAMPLE of a WIRELINE COMPANY

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
Buffalo, Quincy, Toronto	Replaced OSP with digital line carrier and fiber feeder	\$1,250,000	100%	[1]	\$1,250,000
Eureka thru Hamilton, Quincy, Yates Center, Chanute, Fredonia, Fall River & serves USF areas: Buffalo, Toronto, Altoona, Benedict, and Coyville.	Fiber ring from remote terminals to remote switch in Eureka.	\$800,000	50%	[2]	\$400,000
TOTAL		\$2,050,000			\$1,650,000

NOTES

- [1] All of the exchanges in this project are USF supported.
[2] Percent of lines served by the fiber ring in the USF supported exchanges.

The objective of this report is to identify that new investment is being spent to benefit supported areas. Listing individual exchanges that will benefit will help meet this purpose.

Kansas Corporation Commission
ETC Certification Instructions for Attachments 1 - 5

b. Threshold - For companies spending less than \$10M in new projects in Kansas, use \$200,000 as the project threshold. For companies spending \$10M or more, use \$500,000 as the project threshold. It is acceptable to provide more detail than the threshold requires if it helps identify which supported areas are receiving benefit.

5. Attachment 5 - Annual Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT.

Provide the information requested on the Attachment. Attach additional pages, as necessary. All ETCs must complete Questions 1-6. Only Competitive ETCs need to complete Question 7. **If the answer to a question is zero, please report zero and not N/A.**

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 03/11/2025.

STEPHEN ATHANSON
TRACFONE WIRELESS, INC.
D/B/A Safe Link
9700 NW 112TH AVE
MIAMI, FL 33178
sathanson@tracfone.com

RICHARD BALDWIN, PRESIDENT
HOME TELEPHONE COMPANY, INC.
211 S MAIN ST
BOX 8
GALVA, KS 67443
rbaldwin@hci-ks.com

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brett.berry@ks.gov

STEVE BURKS, CHIEF OPERATING OFFICER
AMG Technology Investment Group, LLC
D/B/A NextLink Internet
95 Parker Oaks Lane
Hudson Oaks, TX 76087
regulatory@team.nxlink.com

JENNIFER CARTER, CHIEF COMPLIANCE OFFICER
GLOBAL CONNECTION INC. OF AMERICA
D/B/A STAND UP WIRELESS
390 NE 191st STREET
SUITE8334
MIAMI, FL 33179
jcarter@standupwireless.com

JULIA REDMAN- CARTER, REGULATORY AND
COMPLIANCE OFFICER
BOOMERANG WIRELESS, LLC
2711 LYNDON B JOHNSON FWY
SUITE 1065
DALLAS, TX 75234
regulatory@entouchwireless.com

LANCE CASEY, REGULATORY COMPLIANCE *
CONSOLIDATED COMMUNICATIONS OF KANSAS
COMPANY
2116 S. 17TH STREET
MATTOON, IL 61938
lance.casey@consolidated.com

STEPHANIE CASSIOPPI, SR. DIRECTOR, GOV'T AFFAIRS
USCOC OF NEBRASKA/KANSAS LLC
8410 BRYN MAWR
CHICAGO, IL 60631
stephanie.cassioppi@uscellular.com

SUSAN COCKERHAM, REGULATORY AGENT
YOURTEL AMERICA, INC.
D/B/A TERRACOM
928 MCCALLIE AVENUE
CHATTANOOGA, TN 37403-2724
scockerham@fastektax.com

BRENT CUNNINGHAM, VICE PRESIDENT & GENERAL
MANAGER
CUNNINGHAM TELEPHONE COMPANY, INC.
220 W MAIN
PO BOX 108
GLEN ELDER, KS 67446
brent@ctctfiber.net

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

MYLOC DINN, ASST. GENERAL COUNSEL & SR DIR. OF
GOV. AFFAIRS
SAGE TELECOM COMMUNICATIONS, LLC
1149 S HILL ST STE 400
LOS ANGELES, CA 90015-2894
regulatoryaffairs@truconnect.com

MANDI DREILING
NEX-TECH WIRELESS, L.L.C
3001 NEW WAY
HAYS, KS 67601
mdreiling@ntwls.com

MICHAEL FELICISSIMO, PRESIDENT
NE COLORADO CELLULAR, INC.
D/B/A VIAERO WIRELESS
1224 W PLATTE AVE
FORT MORGAN, CO 80701
mike.felicissimo@viaero.com

BEN FOSTER, PRESIDENT
TWIN VALLEY TELEPHONE, INC.
22 SPRUCE
PO BOX 395
MILTONVALE, KS 67466
ben.foster@tvtnet.net

CRAIG FREEMAN, GENERAL MANAGER
WILSON TELEPHONE COMPANY, INC.
2504 AVE D
PO BOX 190
WILSON, KS 67490-0190
craig@wilsoncommunications.co

MARK M. GAILEY, PRESIDENT & GENERAL MANAGER
TOTAH COMMUNICATIONS, INC.
101 OCHELATA ST
PO BOX 300
OCHELATA, OK 74051-0300
mark@totahcomm.com

RHONDA GODDARD, CFO
NEX-TECH, LLC
145 N. MAIN
PO BOX 158
LENORA, KS 67645
rgoddard@nex-tech.com

RHONDA S GODDARD, CFO*
RURAL TELEPHONE SERVICE COMPANY, INC.
D/B/A Nex-Tech
145 N MAIN
PO BOX 158
LENORA, KS 67645
rgoddard@nex-tech.com

WILLIAM HAAS, MANAGING CORPORATE COUNSEL
ASSURANCE WIRELESS USA, L.P.
12920 SE 38TH STREET
BELLEVUE, WA 98006
william.haas@t-mobile.com

MADISEN HANE, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
madisen.hane@ks.gov

CHRISTINA HICKERT, CFO
S&T COMMUNICATIONS LLC
320 KANSAS
PO BOX 99
BREWSTER, KS 67732
christina.hickert@sttelcom.com

CHRISTINA HICKERT, CFO
S&T TELEPHONE COOPERATIVE ASSOCIATION, INC.
PO BOX 99
320 KANSAS AVE
BREWSTER, KS 67732
christina.hickert@sttelcom.com

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

RANDY HOFFMAN, GENERAL MANAGER
WHEAT STATE TELEPHONE COMPANY, INC.
D/B/A WHEAT STATE TECHNOLOGIES, WST
PO BOX 320
UDALL, KS 67146
rhoffman@wheatstate.com

JOHN R. IDOUX, DIRECTOR KANSAS GOVERNMENTAL
AFFAIRS*
BRIGHTSPEED OF KANSAS, LLC
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
john.idoux@brightspeed.com

JOHN R. IDOUX, DIRECTOR KANSAS GOVERNMENTAL
AFFAIRS
BRIGHTSPEED OF EASTERN KANSAS, LLC
1120 TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
john.idoux@brightspeed.com

JOHN IDOUX, DIRECTOR GOVERNMENTAL AFFAIRS
BRIGHTSPEED OF SOUTHERN KANSAS, INC
1120 SOUTH TRYON STREET
SUITE 700
CHARLOTTE, NC 28203
john.idoux@brightspeed.com

JOHN IDOUX, REGULATORY AFFAIRS MANAGER
EMBARQ COMMUNICATIONS, INC.
D/B/A CENTURYLINK COMMUNICATIONS
KSOPKJ04-4015
600 NEW CENTURY PKWY
NEW CENTURY, KS 66031
john.idoux@brightspeed.com

FLOYD J JASINSKI, DIRECTOR - LEGISLATIVE &
REGULATORY
CONSOLIDATED COMMUNICATIONS OF MISSOURI
COMPANY
114 VERNON STREET
ROSEVILLE, CA 95678
floyd.jasinski@consolidated.com

KELLY JESEL, TREASURER
TELRITE CORPORATION
4113 monticello street
COVINGTON, GA 30014
kelly.jesel@telrite.com

ETHAN KAPLAN, GENERAL COUNSEL
IDEATEK TELCOM, LLC
111 OLD MILL LN
BUHLER, KS 67522
ekaplan@ideatek.com

BRANDON KOCH, PRESIDENT & GM
H&B CABLE SERVICE, INC.
108 N MAIN
PO BOX 108
HOLYROOD, KS 67450
brkoch@hbcomm.net

BRANDON KOCH, PRESIDENT & GM
H&B COMMUNICATIONS, INC.
108 N MAIN
PO BOX 108
HOLYROOD, KS 67450
brkoch@hbcomm.net

JILL KUEHNY, CEO/GENERAL AMANGER
KANOKLA TELEPHONE ASSN., INC.
100 KANOKLA AVE
PO BOX 111
CALDWELL, KS 67022
jkuehny@kanoklanetworks.com

CHARI LAWRENCE, GOVERNMENT AFFAIRS /
RELATIONS MGR
COX KANSAS TELCOM, L.L.C.
D/B/A COX COMMUNICATIONS, INC
7401 FLORIDA BOULEVARD
BATON ROUGE, LA 70806
chari.lawrence@cox.com

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

JENNIFER LEACH, GM/CEO
PEOPLES TELECOMMUNICATIONS, LLC
208 N BROADWAY
PO BOX 450
LA CYGNE, KS 66040
jennifer@peopletelecom.net

HARRY J. LEE, JR., PRESIDENT/GENERAL MANAGER
LAHARPE TELEPHONE COMPANY, INC.
D/B/A LAHARPE LONG DISTANCE
109 W 6TH ST
PO BOX 100
LA HARPE, KS 66751
harry.lee@laharpetel.com

SCOTT LEITZEL, VICE PRESIDENT - OPERATIONS
TWIN VALLEY COMMUNICATIONS, INC.
22 SPRUCE
PO BOX 395
MILTONVALE, KS 67466
scott.leitzel@tvinc.net

PATRICK MCCANN, V.P. AND ASSISTANT GENERAL
COUNSEL
MIDCONTINENT COMMUNICATIONS
D/B/A MIDCO
4020 W. CAYMAN ST
SIOUX FALLS, SD 57107
patrick.mccann@midco.com

WILLIAM R. MCVEY, COO
SOUTHERN KANSAS TELEPHONE COMPANY, INC.
112 S LEE ST
PO BOX 800
CLEARWATER, KS 67026-0800
bill.mcvey@sktcompanies.com

ANDREW MONROE, COO
PLAINS INTERNET, LLC
7519 CANYON DR.
AMARILLO, TX 79519
andrew@plainsinternet.com

BILL MORRIS, CHIEF FINANCIAL OFFICER
TEMPO TELECOM, LLC
25925 TELEGRAPH ROAD
SUITE 210
SOUTHFIELD, MI 48033
bill.morris@lingoky.com

CATHERINE MOYER, GENERAL MANAGER & CEO
PIONEER TELEPHONE ASSN., INC.
D/B/A PIONEER COMMUNICATIONS
120 W KANSAS AVE
PO BOX 707
ULYSSES, KS 67880-0707
catherine.moyer@pioncomm.net

MICHAEL J. MURPHY, PRESIDENT & MANAGER
GORHAM TELEPHONE COMPANY
100 MARKET
PO BOX 235
GORHAM, KS 67640
mmurphy@gorhamtel.com

JENNIFER PACHNER, ASSESSMENT
UNITED TELEPHONE ASSN., INC.
1107 MCARTOR RD
PO BOX 117
DODGE CITY, KS 67801
jenniferp@unitedtelcom.net

JENNIFER PACHNER, CONTROLLER
UNITED WIRELESS COMMUNICATIONS, INC.
1107 MCARTOR RD
PO BOX 117
DODGE CITY, KS 67801
jenniferp@unitedtelcom.net

JASON PETTIT, CONTROLLER
TRI-COUNTY TELEPHONE ASSOCIATION, INC.
1568 S 1000 RD
PO BOX 299
COUNCIL GROVE, KS 66846
jpettit@tctkansas.net

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

JEFF PICKERING, ACCOUNTING SUPERVISOR
SKYBEAM, LLC
61 INVERNESS DR EAST
STE 250
ENGLEWOOD, CO 80115147
jpickering@risebroadband.com

KATHY PRICE, GENERAL MANAGER*
ZENDA TELEPHONE COMPANY, INC.
208 N. MAIN ST
ZENDA, KS 67159
kprice@zendatelephone.com

JORDAN PRUETT, COMPANY
RESOUND NETWORKS, LLC
100 N CUYLER STREET
PAMPA, TX 79065
jordan.pruett@resoundnetworks.com

SHANA RAINS, ACCOUNTANT
MADISON TELEPHONE COMPANY, INC.
117 NORTH THIRD
P O BOX 337
MADISON, KS 66860
mtn.shana@gmail.com

BEAU REBEL, GENERAL MANAGER
GOLDEN BELT TELEPHONE ASSOCIATION.
103 LINCOLN ST
RUSH CENTER, KS 67575-3000
brebel@gbtlive.com

CHRIS RENO, VICE PRESIDENT - CONTROLLER
S&A TELEPHONE COMPANY, INC.
D/B/A Highline Kansas
413 MAIN ST
PO BOX 68
ALLEN, KS 66833
chris.reno@highlinefast.com

JAVIER* RODRIGUEZ, AREA MANAGER - REGULATORY
RELATIONS AT&T
SOUTHWESTERN BELL TELEPHONE COMPANY, LLC
D/B/A AT&T KANSAS
208 S AKARD ST
DALLAS, TX 75202
jr1515@att.com

KATHY RUOFF, CFO
RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.
608 MAIN ST
PO BOX 147
EVEREST, KS 66424-0147
kathy@rainbowtel.com

MATTHEW SAMS, CHIEF OF STAFF
MERCURY WIRELESS KANSAS, LLC
1100 WALNUT STREET, SUITE 2050
KANSAS CITY, MO 64106
matthew.sams@mercurybroadband.com

BECKY SCOTT
ELKHART TELEPHONE COMPANY, INC.
610 S COSMOS
PO BOX 817
ELKHART, KS 67950
bscott@epictouch.com

CARLA SHEARER, CEO/GENERAL MANAGER
SOUTH CENTRAL TELEPHONE ASSN. INC.
215 S ILIFF
PO BOX B
MEDICINE LODGE, KS 67104
cshearer@sctelcom.com

DAVE SOPER, GENERAL MANAGER
COLUMBUS COMMUNICATIONS SERVICES, LLC
224 SOUTH KANSAS AVENUE
COLUMBUS, KS 66725
dsoper@columbus-telephone.com

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

TAMMY SOUZA, ACCOUNTING MANAGER*
MOKAN DIAL, INC.
P.O. Box 729
LEWISVILLE, AR 71845
tsouza@townes.net

NATHAN STOOKE, PRESIDENT
WISPER ISP LLC
9711 FUESSER RD
MASCOUTAH, IL 62258
nstooke@wisperisp.com

JOHN TIETJENS, PRESIDENT AND GENERAL MANAGER
LR COMMUNICATIONS, INC.
D/B/A MUTUAL TELECOMMUNICATIONS
365 MAIN ST
PO BOX 338
LITTLE RIVER, KS 67457
jtietjens@mtc4me.com

JOHN TIETJENS, PRESIDENT AND GENERAL MANAGER
MUTUAL TELEPHONE COMPANY
365 MAIN ST
PO BOX 338
LITTLE RIVER, KS 67457
jtietjens@mtc4me.com

JIMMY TODD, CEO
MOUNDRIDGE TELEPHONE COMPANY
145 N MAIN
LENORA, KS 67645
jtodd@nex-tech.com

MARK WADE, VP OF OPERATIONS
HAVILAND TELEPHONE COMPANY, INC.
104 N MAIN
PO BOX 308
HAVILAND, KS 67059
mark@havilandtelco.com

MARK WADE, VP OF OPERATIONS
J.B.N. TELEPHONE COMPANY, INC.
PO BOX 111
HOLTON, KS 66436
mark@havilandtelco.com

KEVIN WAULIGMAN, COMPLIANCE MANAGER
I-WIRELESS, LLC
ONE LEVEE WAY STE 3116
NEWPORT, KY 41071-1661
kwauligman@iwirelesshome.com

JEFF WICK, PRESIDENT/GENERAL MANAGER
WAMEGO TELECOMMUNICATIONS COMPANY, INC.
1009 LINCOLN
PO BOX 25
WAMEGO, KS 66547-0025
jwick@wtcks.com

JEFF WICK, PRESIDENT/GENERAL MANAGER
WTC COMMUNICATIONS, INC.
1009 LINCOLN
PO BOX 25
WAMEGO, KS 66547
jwick@wtcks.com

CRAIG WILBERT, GENERAL MANAGER
CRAW-KAN TELEPHONE COOPERATIVE, INC.
200 N OZARK
PO BOX 100
GIRARD, KS 66743
crwilbert@ckt.net

CANDACE WRIGHT, CEO/GM
BLUE VALLEY TELE-COMMUNICATIONS, INC.
1559 PONY EXPRESS HWY
HOME, KS 66438
cwright@bluevalleyinc.net

CERTIFICATE OF SERVICE

25-GIMT-332-GIT

/S/ KCC Docket Room
KCC Docket Room
