

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

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

In the Matter of a General Investigation Into)
the Adjustment of Intrastate Switched Access) Docket No. 19-GIMT-006-GIT
Charges for Rural Telephone Companies in)
Compliance with K.S.A. 66-2005(c) and)
Federal Communications Commission)
Reforms.)

ORDER OPENING DOCKET AND ESTABLISHING PROCEDURAL SCHEDULE

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

1. K.S.A. 66-2005(c) states that “[e]ach rural telephone company shall adjust its intrastate switched access rates on March 1 of each odd-numbered year to match its interstate switched access rates....” Additionally, K.S.A. 66-2005(c)(1) provides that “[a]ny reduction of a rural telephone company’s cost recovery due to reduction of its intrastate access revenue, except such revenue recovered from another support mechanism, shall be recovered from the KUSF.”

2. The purpose of this Docket is to aid the rural local exchange carriers (RLECs) in complying with K.S.A. 66-2005(c) by determining the intrastate switched end office and tandem access rate adjustments necessary for an RLEC to maintain parity with its interstate rates, determining each RLEC’s calculated net intrastate access revenue increase or reduction, as well as the corresponding adjustment to each RLEC’s annual KUSF support.

3. Commission Staff (Staff) submitted a Report and Recommendation (R&R) dated July 5, 2018, attached hereto and made a part hereof by reference. The R&R contains a recitation

of the relevant Commission and Federal Communications Commission (FCC) rulings to date with respect to intrastate access charges and KUSF adjustments.

4. Staff notes that K.S.A. 66-2005(c) requires the RLECs to adjust their intrastate access rates to parity on March 1st of each odd-numbered year. However, the FCC's reforms require adjustments to their intrastate terminating access rates on July 1st of each year. In the past, the Commission determined that for ease of administration, it would require the K.S.A. 66-2005(c) adjustments to coincide with the FCC's reforms.¹ Therefore, Staff recommends that the 2019 K.S.A. 66-2005(c) adjustments also coincide with the July 1, 2019, FCC ordered adjustments.

5. Staff also notes that K.S.A. 66-2005(c) requires all intrastate access rates to be adjusted to parity every two years, whereas the FCC's reforms require terminating rates to be adjusted annually. In order to reconcile these requirements, the Commission determined that an RLEC is required to adjust its intrastate originating switched access rates to parity in odd-numbered years and its intrastate terminating access rates annually pursuant to FCC rules.²

6. Staff points out that K.S.A. 66-2005(c)(1) requires an RLEC, absent local rate recovery, to recover the change in its intrastate access revenue from the KUSF, "except such revenue recovered from another support mechanism" The FCC created the Connect America Fund (CAF) and Access Recovery Charge (ARC) to allow an RLEC to recover intrastate access revenue and, therefore, the Commission has determined that an RLEC is required to reduce any

¹ Order Implementing Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, Docket No. 13-GIMT-004-GIT (Docket 13-004), September 14, 2012 (Sept. 2012 Order). See also 47 C.F.R. §51.909 and Order, CC Docket No. 01-92, rel. March 31, 2014, ¶7-9. See also Order Opening Docket; Requiring RLEC Data Filings; Procedural Schedule; Discovery Order; Protective Order; General Service Matters, Docket 15-GIMT-068-GIT, August 26, 2014.

² Id. See also Order Opening Docket; Requiring RLEC Data Filings; Procedural Schedule; Discovery Order; Protective Order; General Service Matters, Docket 15-GIMT-068-GIT, August 26, 2014.

calculated intrastate access revenue reduction by its intrastate access revenue ARC and CAF support.³

7. To aid in facilitating the RLECs' adjustments to intrastate access rates, Staff recommends the Commission open this docket, wherein the RLECs will be required to file certain information contained in Attachment 1 to Staff's R&R in the docket by August 17, 2018, and e-mail a Microsoft Excel version of the same information to Staff at s.reams@kcc.ks.gov, with a copy to c.aarnes@kcc.ks.gov by the same date. Reported minutes of use (MOU) should be for the twelve-month period ending June 30, 2018, and rates used to determine parity should be those in effect as of July 3, 2018. Staff will use the filed data to confirm the appropriate access rates for the carriers, as well as the adjustments to KUSF distributions under K.S.A. 66-2005(c)(l).

8. Staff proposes a procedural schedule to govern this docket as follows:

<u>Date</u>	<u>Procedural Schedule</u>
August 17, 2018	RLEC's file and provide Attachment 1
September 14, 2018	Staff files Direct Testimony
September 21, 2018	Rebuttal Testimony
October 4, 2018	Evidentiary Hearing
November 2018	Commission Order
July 2019	Implementation of rates, KUSF support

9. The evidentiary hearing in this matter is set for October 4, 2018, at 10:30 a.m. immediately following the Commission's Business meeting, in the First Floor Hearing Room at the Kansas Corporation Commission, 1500 SW Arrowhead Road, Topeka, Kansas 66604.

10. Parties are directed to notify Ahsan Latif, Counsel for Staff, at a.latif@kcc.ks.gov by September 25, 2018, if they believe the October 4, 2018 hearing is necessary.

³ Order, Opening Docket to Determine Intrastate Access Revenues Due to Rural Local Exchange Carriers, Docket No. 16-GIMT-468-GIT, April 26, 2016.

11. Staff also suggested that if a party becomes aware of any computational error in Staff's calculations, the party should notify Staff as soon as possible to allow Staff to determine whether the error is material, and if so, to file revised calculations.

12. Finally, Staff asks that the parties consent to electronic service.

13. The Commission finds Staff's recommendations to be reasonable and hereby adopts the same.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. This Docket is opened for the purposes stated above.

B. All RLECs are made parties to this docket. Parties that enter their appearance shall provide an email address and indicate their consent to electronic service.

C. The Commission adopts the procedural schedule referenced in Paragraph 8 and sets the evidentiary hearing referenced in Paragraph 9. The parties shall notify Ahsan Latif, Counsel for Staff, at a.latif@kcc.ks.gov by Tuesday, September 25, 2018, if they believe the evidentiary hearing is necessary.

D. RLECs shall file in this Docket the data contained in Attachment 1 to Staff's R&R by August 17, 2018. RLECs shall also email a Microsoft Excel version of the same information to Staff by the same date, attention Sandy Reams: s.reams@kcc.ks.gov, and copy Christine Aarnes: c.aarnes@kcc.ks.gov.

E. Parties have 15 days, plus three days if service is by mail, from the date of service of this Order to petition the Commission for reconsideration or request a hearing, as provided in K.S.A. 77-542.⁴

⁴K.S.A. 77-537(b); K.S.A. 66-118b; K.S.A. 77-529(a)(1).

F. The Commission retains jurisdiction over the subject matter and parties for the purpose of issuing such further orders, as necessary.

BY THE COMMISSION IT IS SO ORDERED.

Albrecht, Chair; Emler, Commissioner; Keen, Commissioner

Dated: 07/19/2018



Lynn M. Retz
Secretary to the Commission

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SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

REPORT AND RECOMMENDATION UTILITIES DIVISION

To: Chair Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Dwight Keen

From: Sandy Reams, Assistant Chief of Telecommunications
Christine Aarnes, Chief of Telecommunications
Jeff McClanahan, Director of Utilities

Date: July 5, 2018

Re: Docket No. 19-GIMT-006-GIT
In the Matter of a General investigation Into the Adjustment of Intrastate Switched Access Charges for Rural Telephone Companies in Compliance with K.S.A. 66-2005(e) and Federal Communications Commission Reforms.

EXECUTIVE SUMMARY

Pursuant to K.S.A. 66-2005(c), a rural local exchange carrier (RLEC) shall adjust its intrastate switched access rates to interstate levels in each odd-numbered year. An RLEC's annual Kansas Universal Service Fund (KUSF) support is adjusted by an amount equal to the calculated increase or decrease in its intrastate switched access revenue.

Staff recommends the Commission issue an Order to open a docket to address the RLECs' intrastate switched access rate adjustments to parity with their interstate access rates. Staff recommends that each RLEC complete Attachment 1, enclosed with this Report and Recommendation (R&R), based on its interstate and intrastate access rates, effective July 3, 2018, as identified in Attachment 2 to this R&R, and the Minutes of Use (MOU) for the twelve-month period ended June 30, 2018. Staff recommends that each RLEC be directed to file Attachment 1 in the Docket and send an electronic copy, in Excel format, to Staff at: s.reams@kcc.ks.gov and c.aarnes@kcc.ks.gov. Finally, Staff recommends that the Commission adopt Staff's proposed procedural schedule and that the parties be asked to consent to electronic service.

BACKGROUND

I. Biennial Intrastate Access Adjustments - K.S.A. 66-2005(c)

Pursuant to K.S.A. 66-2005(c)(1) and subject to the Commission's approval, all rural LECs are required to reduce their intrastate switched access rates to interstate levels effective March 1st of

each odd-numbered year. The increase or reduction in an RLEC's intrastate access revenue is calculated based on the rate differential between the company's interstate and intrastate access rates and the MOU for a twelve-month period. The Commission is authorized to allow the access revenue reduction to be recovered through local rates, with any amount not recovered through local service rates recovered from the KUSF, pursuant to K.S.A. 66-2008. The statute limits an RLEC's intrastate access revenue recovery to that not recovered from another support mechanism¹ and further limits recovery of the aggregate total access revenue for all RLECs to .75% of the intrastate retail revenues used to set the KUSF assessment rate. If the amount of revenue to be recovered from the KUSF exceeds the revenue limit, the remaining revenue and rate adjustments are deferred until the next odd-numbered year.

The RLECs' initially reduced their intrastate switched access rates to parity with their interstate rates on March 1, 1997.² Each RLEC's KUSF support was increased by an amount equal to its calculated intrastate access revenue reduction. This process continued through 2000, when the reduction in the RLECs' MOU resulted in their interstate access rates being increased to ensure they recovered their interstate access revenue requirements.

The Commission, therefore, addressed whether an RLEC is required to only decrease its intrastate access rates or whether the rates should also be increased to maintain parity. The Commission found that K.S.A. 66-2005 focuses on rate parity and, therefore, an RLEC must adjust its intrastate access rates, whether via an increase or decrease, to maintain parity with its interstate access rates.³ This means an RLEC's KUSF support is also increased or reduced, dependent upon whether its intrastate rates increase or decrease. The Commission most recently addressed the RLECs' intrastate access rate and KUSF support adjustments pursuant to K.S.A. 66-2005(c) in Docket No. 16-GIMT-587-GIT (Docket 16-587).⁴

For interstate access purposes, Columbus Communications Services, LLC (Columbus); LaHarpe Telephone Company, Inc. (LaHarpe); Pioneer Telephone Association, Inc. (Pioneer); Moundridge Telephone Company (Moundridge); Rural Telephone Service Co., Inc. (Rural); Totah Telephone Co., Inc. (Totah); and Wamego Telecommunications Company, Inc. (Wamego) maintain their own interstate access tariffs.⁵ The remaining RLECs concur in the National Exchange Carrier Association's (NECA) tariff.

NECA's interstate access rates are based on pooling the costs and usage of all members together and determining the interstate rates necessary to allow members to recover their interstate access revenue requirement. NECA's tariff contains Rate Bands to allow RLECs with higher costs to recover their costs via a higher Rate Band rate and those with lower costs to recover their costs via lower Rate Band rates. Although NECA's tariff includes numerous Rate Bands for end office

¹ The Kansas Court of Appeals determined K.S.A. 66-2005(c) is not preempted by the FCC's reforms and stated "[a] logical reading of K.S.A. 2014 Supp. 66-2005(c)(1) . . . infers that the RLECs will be required to seek support from the CAF and/or federally allowed access recovery charges before seeking KUSF distributions." *Bluestem Tel. Co. v. Kansas Corp. Comm'n*, 52 Kan.App.2d 96 (2015).

² Order, Docket No. 94-GIMT-478-GIT, December 27, 1996.

³ Order, Docket No. 01-GIMT-081-GIT, January 4, 2001.

⁴ Order Adopting Intrastate Originating Switched Access Rates and KUSF Adjustments, Docket No. 16-GIMT-587-GIT, October 18, 2016.

⁵ Moundridge, Pioneer, and Totah's interstate tariffs are included in John Staurulakis, Inc.'s FCC Tariff No. 1. Rural and Wamego's interstate tariffs are included in Alexicon Telecommunications Consulting, Inc.'s FCC Tariff No. 1.

switching service, all of the rates are the same. NECA's tariff also includes two tandem switch service Rate Bands, separately for originating and for terminating service.⁶

Interstate access rates are adjusted annually, with only NECA members authorized to increase their intrastate terminating switched access rates to remain at parity with NECA's rates.⁷ Wamego withdrew from NECA's tariff, effective July 2017, therefore, the Company must adjust its intrastate originating access rates to parity, but retain the lower of its current intrastate or interstate terminating access rates.

For intrastate purposes, Blue Valley Tele-Communications, Inc. (Blue Valley), Columbus and LaHarpe maintain their own intrastate access tariffs. Blue Valley's tariff, in general, mirrors the NECA access tariff and, therefore, the RLECs that concur in NECA's tariff also concur in Blue Valley's tariff. Since Moundridge, Pioneer, Rural, Totah, and Wamego have their own interstate tariffs, they maintain company-specific rates within Blue Valley's tariff to ensure parity with interstate rates. For the remaining rates, they concur in Blue Valley's tariff.

II. Federal Communications Commission (FCC) Reforms

In November 2011, the FCC determined all LECs would transition their interstate and intrastate terminating switched end office and certain transport access rates to a bill-and-keep methodology.⁸ The FCC capped all interstate originating and terminating switched access and reciprocal compensation rates and intrastate terminating access rates for rate-of-return carriers. Intrastate originating access rates were not capped for rate-of-return carriers. The FCC also established two access recovery mechanisms - the Access Recovery Charge (ARC) and the Connect America Fund (CAF). All of the Kansas RLECs have elected rate-of-return regulation.

The FCC subsequently released several orders to clarify its November 2011 Order and harmonize its rules. With regard to the NECA terminating rates, the FCC determined that, in consideration of the impact on the CAF and NECA's rates, NECA's rates must be adjusted to reflect when an RLEC enters or exits the access pool.⁹ Thus, the FCC clarified that NECA's terminating interstate tandem switch rates to be increased or reduced, with any RLEC concurring in NECA's tariff adjusting its intrastate rate if necessary to maintain parity. Absent this authorized increase, an RLEC cannot increase an intrastate terminating access rate if the intrastate rate is lower than the interstate rate.¹⁰

The FCC has implemented its terminating access reforms in multiple phases, with the first phase implemented July 1, 2012. By July 1, 2017, the FCC's reforms required all rate-of-return LECs

⁶ Tandem switch services include tandem switched facility, termination, and switching.

⁷ Order, *In the Matter of Connect America Fund*, WC Docket 10-90, rel. March 27, 2013 (March 2013 Order).

⁸ Report and Order and Further Notice of Proposed Rulemaking, *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, (November 2011 Order).

⁹ *In the Matter of Connect America Fund*, WC Docket 10-90, Order, rel. March 27, 2013 (March 2013 Order).

¹⁰ Order Implementing Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, Docket No. 13-GIMT-004-GIT (Docket 13-004), September 14, 2012 (Sept. 2012 Order). See also 47 C.F.R. §51.909 and Order, CC Docket No. 01-92, rel. March 31, 2014, ¶7-9.

to begin to transition their interstate and intrastate terminating switched end office access rates from \$.005 to \$.0007 over a three year period. Thus, as of July 3, 2018, all of the RLECs have a \$.002133 intrastate terminating switched end office access rate that will be reduced to \$.0007 effective July 2019.

Consistent with FCC rules, the RLECs concurring in NECA's interstate and Blue Valley's intrastate tariffs have intrastate switched terminating tandem transport access rates in parity with the corresponding interstate rate. RLECs not concurring in NECA's tariff have intrastate tandem and/or other transport rates in parity with, or lower than, the corresponding interstate rate.

III. Impact of FCC Reforms on Kansas Biennial Requirement

Several conflicts with K.S.A. 66-2005(c) were created by the FCC. First, K.S.A. 66-2005(c) requires an RLEC to adjust its intrastate switched access rates to parity with its interstate rates on March 1st each odd-numbered year, whereas the FCC's reforms are effective July 1st. To harmonize the effective dates, the Commission determined that the RLECs will adjust their intrastate access rates to parity concurrent with the FCC's effective date.¹¹

Next, K.S.A. 66-2005(c) requires all intrastate access rates to be adjusted to parity every two years, in comparison to the FCC's reforms that require terminating rates to be adjusted annually. To harmonize the requirements, the Commission determined that an RLEC is required to adjust its intrastate originating switched access rates to parity in odd-numbered years and its intrastate terminating access rates annually pursuant to FCC rules.¹²

Finally, K.S.A. 66-2005(c)(1) requires that, absent local rate recovery, an RLEC is to recover the change in its intrastate access revenue from the KUSF, "except such revenue recovered from another support mechanism . . .". Since an RLEC recovers intrastate access revenue from the CAF and ARC support mechanisms, the Commission determined that an RLEC is required to reduce any calculated intrastate access revenue reduction by its intrastate access revenue ARC and CAF support.¹³

ANALYSIS:

The purpose of this Docket is to determine: (1) the intrastate switched end office and tandem access rate adjustments necessary for an RLEC to maintain parity with its interstate rates; (2) each RLEC's calculated net intrastate access revenue increase or reduction; and (3) the corresponding adjustment to each RLEC's annual KUSF support. The adjustments will be effective in July 2019. Some RLECs may also need to adjust certain transport rates to maintain parity.

¹¹ Id. See also Order Opening Docket; Requiring RLEC Data Filings; Procedural Schedule; Discovery Order; Protective Order; General Service Matters, Docket 15-GIMT-068-GIT, August 26, 2014.

¹² Id. See also Docket 13-004, Order Adopting Commission Staff's Calculations and Recommendations Regarding Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, November 7, 2012; Order Requiring RLECs to File Revised Intrastate Access Rate Data and Tariffs, Directing Staff to Submit an R&R With Updated Information, and Clarifying Tariff Revision Filing Deadlines and Effective Dates, April 10, 2013; Order Nunc Pro Tunc, April 17, 2013; and Order Approving RLECs' Intrastate Access Rates and Revenues and a Net, Aggregate Reduction to the Kansas Universal Service Fund, May 22, 2013.

¹³ Order, Opening Docket to Determine Intrastate Access Revenues Due to Rural Local Exchange Carriers, Docket No. 16-GIMT-468-GIT, April 26, 2016.

Each RLEC will need to complete Attachment 1 using its interstate and intrastate originating and terminating switched end office, tandem, and other applicable transport rates that were effective July 3, 2018. The RLEC will also use its intrastate access MOU for the twelve-month period ended June 30, 2018. Each RLEC will adjust its originating rates to parity with its interstate rates and any RLEC that participates in NECA's tariff will adjust its intrastate terminating rates to maintain parity with NECA's rates. Any RLEC not participating in NECA's tariff may only decrease its intrastate terminating access rates to maintain parity.¹⁴ This may result in an RLEC having an intrastate terminating access rate that is less than its corresponding interstate access rate.

The RLECs' intrastate terminating access rates that became effective July 3, 2018, will be used for this Docket; however, the actual terminating rates that will be effective July 1, 2019, will be those required by the FCC. Thus, the RLECs will not file revised intrastate access tariffs in this Docket; instead, they will file them in the spring of 2019 in a separate proceeding to be opened by the Commission to address the FCC's terminating access reforms.

Staff will need to review each RLEC's data and, if necessary, contact an RLEC with any questions about the data. Staff will need to perform adjustment calculations for all of the RLECs and draft and file testimony regarding the data. The KUSF support adjustments determined in this Docket will be included in Staff's annual KUSF assessment rate calculations to be filed in December 2018. After Staff files its testimony, parties should be provided an opportunity to file rebuttal testimony. Staff, therefore, proposes the following procedural schedule for this Docket:

<u>Procedural Schedule</u>	<u>Proposed Date</u>
RLECs file and provide Attachment 1	August 17, 2018
Staff's Direct Testimony	September 14, 2018
Rebuttal Testimony	September 21, 2018
Evidentiary Hearing	October 2018
Commission Order	November 2018
Implementation of rates, KUSF support	July 2019

RECOMMENDATION:

Staff recommends the Commission open a proceeding to address the RLECs' intrastate switched access rate, revenue, and KUSF support adjustments, consistent with K.S.A. 66-2005(c) and the FCC's access reforms. The RLECs should be directed to file a completed Attachment 1 in the Docket and provide an Excel copy of Attachment 1 to Staff prior to or concurrent with filing Attachment 1 in the Docket. Staff further recommends that the Commission adopt Staff's proposed procedural schedule.

¹⁴ Sept. 2012 Order.

TELEPHONE COMPANY: Name **Contact Name:****Contact Phone No.:****Contact EMail:****** Based on Volumes for Twelve Months July 1, 2017 through June 30, 2018 ******Information on this Page will automatically update when the Originating and Terminating Worksheets are completed.****KUSF SUPPORT ADJUSTMENT DETERMINATION - ORIGINATING ONLY:**

1	Annual IntraState Originating Access Revenues (p. 2, col. E, line 8)	\$	-
2	LESS: Intrastate Originating Revenues @ Interstate Rate (p. 2, col. F, line 8)	\$	-
3	Annual KUSF Support (Increase)/Reduction Adjustment (Line 2 less 1)	\$	-
4	Monthly KUSF Support Adjustment (Line 3/12)	\$	-

KUSF SUPPORT ADJUSTMENT DETERMINATION - TERMINATING ONLY:

5	Annual IntraState Terminating Access Revenues (p. 3, col. E, line 7)	\$	-
6	LESS: Intrastate Terminating Revenues @ Interstate Rate (p. 3, col. F, line 7)	\$	-
7	Total Annual KUSF Support (Increase)/Reduction Adjustment (Line 6 less 5)	\$	-
8	Less: ARC/ CAF ICC Recovery (p. 4, col. B, line 6)	\$	-
9	Net Annual KUSF Support (Increase)/Reduction (Line 8 less 7)	\$	-
10	Net Monthly Adjustment (Line 9/12)	\$	-

TOTAL COMPANY/ KUSF SUPPORT IMPACT:

		Annual	Monthly
11	KUSF Support Adjustment - Originating (Line 3)	\$	-
12	KUSF Support Adjustment - Terminating (Line 9)	\$	-
13	Total Company KUSF Support (Increase)/Reduction	\$	-

TELEPHONE COMPANY:

Name

** Based on Volumes for Twelve Months July 1, 2017 through June 30, 2018 **

INTRASTATE - ORIGINATING MOU & RATES

If your company exited the NECA pool/tariff after July 1, 2016, use the intrastate rate in effect prior to exiting the pool (see also Docket No. 16-GIMT-587-GIT for the approved intrastate rates).

	RATE ELEMENT	ANNUAL UNITS 6/30/2018	STATE RATE AS OF 7/3/2018	INTERSTATE RATE AS OF 7/3/2018	CURRENT REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
	(A)	(B)	(C)	(D)	(E)	(F)
1	End Office Switching	-	\$	-	\$	-
2	Info Surcharge (Per 100)				\$	-
3	LT Termination				\$	-
4	LT Facility Per Min-Mile				\$	-
5	Tandem Switching				\$	-
6	Local Transport - Other				\$	-
7	Other Switched Access				\$	-
8	Total Access Revenue				\$	-
9	Difference - Current State (E) Less Interstate (F)					\$

(a) If your company exited the NECA pool after July 2016, use the intrastate rate in effect prior to exiting the NECA pool.

CROSSCHECK TO BOOKED REVENUE

10	BOOKED SWITCHED INTRASTATE ORIGINATING ACCESS REVENUE	
11	CALCULATED ORIGINATING REVENUE (E9)	\$ -
12	DIFFERENCE *	\$ -

* IF THE DIFFERENCE IS GREATER THAN \$5,000, PLEASE EXPLAIN BELOW.

RESIDUAL KUSF SUPPORT IMPACT:

13	Intrastate Switched Originating Access Revenues (col. E, line 8)	\$ -
14	LESS: Intrastate Terminating Revenues @ Interstate Rate (col. F, line 8)	\$ -
15	Annual KUSF Support (Increase)/Reduction Adjustment (14 less 13)	\$ -

OTHER LOCAL TRANSPORT DETAIL

Instructions: Provide supporting detail for Local Transport - Other, Revenue Changes. Complete this information or furnish comparable workpapers that show the LT calculations. The LT- Other may not automatically update to the revenues in Columns (E) & (F). Please post them from the lines below.

If your company has more usage sensitive rate elements, please insert rows and numbers as necessary.

	RATE ELEMENT	ANNUAL UNITS 6/30/2018	STATE RATE AS OF 7/3/2018	INTERSTATE RATE AS OF 7/3/2018	CURRENT REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
	(A)	(B)	(C)	(D)	(E)	(F)
16	Usage Sensitive Rate Elements					
16	Other Transport (List)				\$ -	\$ -
17					\$ -	\$ -
18					\$ -	\$ -
19	Total Local Transport - Other Revenues				\$ -	\$ -

TELEPHONE COMPANY:

Name

** Based on Volumes for Twelve Months July 1, 2017 through June 30, 2018 **

INTRASTATE - TERMINATING MOU & RATES

LIMITED TO NECA POOL/TARIFF INCREASES; OTHERWISE, LOWER OF INTERSTATE OR INTRASTATE RATE IS USED.

	RATE ELEMENT	ANNUAL UNITS 6/30/2018	STATE RATE AS OF 7/3/2018	INTERSTATE RATE AS OF 7/3/2018	CURRENT STATE REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
	(A)	(B)	(C)	(D)	(E)	(F)
1	End Office Switching		0.022310	\$ 0.022310	\$ -	\$ -
2	LT Termination				\$ -	\$ -
3	LT Facility Per Min-Mile				\$ -	\$ -
4	Tandem Switching				\$ -	\$ -
5	Local Transport - Other				\$ -	\$ -
6	Other Switched Access				\$ -	\$ -
7	Total Access Revenue				\$ -	\$ -
8	Diff Curr State (E) Less Interstate (F)					\$ -

CROSSCHECK TO BOOKED REVENUE

9	BOOKED REVENUE FOR SWITCHED INTRASTATE TERMINATING ACCESS	
10	CALCULATED TERMINATING REVENUE (E6)	\$ -
11	DIFFERENCE *	\$ -

* IF THE DIFFERENCE IS GREATER THAN \$5,000, PLEASE EXPLAIN BELOW.

RESIDUAL KUSF SUPPORT IMPACT:

12	Annualized Switched Terminating Access Revenues (col. E, line 7)	\$ -
13	LESS: Interstate Terminating Revenues (col. F, line 7)	\$ -
14	Total Annual KUSF Support (Increase)/ Reduction Adjustment - prior to Other Recovery Mechanism(s) (13 less 12)	\$ -

LOCAL TRANSPORT DETAIL

Instructions: Provide supporting detail to understand the Local Transport - Other Revenue Changes. Complete this information or furnish comparable workpapers that show the LT calculations. The LT- Other may not automatically update to the revenues in Columns (E) & (F). Please post them from the lines below.

If your company has more usage sensitive rate elements, please insert rows and numbers as necessary.

	RATE ELEMENT	ANNUAL UNITS 6/30/2018	STATE RATE AS OF 7/3/2018	INTERSTATE RATE AS OF 7/3/2018	CURRENT REVENUE (B x C)	EQUIVALENT STATE REV @ INTERSTATE RATES (B x D)
	(A)	(B)	(C)	(D)	(E)	(F)
Usage Sensitive Rate Elements						
15	Other Transport (List)				\$ -	\$ -
16					\$ -	\$ -
17	Total Local Transport - Other Revenues				\$ -	\$ -
18	Total Local Transport Revenues				\$ -	\$ -

Intrastate Terminating Access
Revenue Recovered from Other Sources and
Net KUSF Support

TELEPHONE COMPANY:

(name)

INTRASTATE TERMINATING ACCESS REVENUE RECOVERY SUPPORT FROM NON-KUSF SOURCES

	(A)	(B)
1 Gross KUSF Increase - Terminating Access Revenue (page 3, col F, line 8)		\$ -
2 Less: Revenue/Support from Other Recovery Mechanisms:		
3 CAF Support for Intrastate Access (Line 11)	\$ -	
4 ARC Recovery for Intrastate Access (Line 16)	-	
5 Other Recovery for Intrastate Access (Line 17 - List below)	-	
6 Total Terminating Access Revenue Recovered from Other Sources (Line 3+4+5)		\$ -
7 Net Annual KUSF Support Increase (Line 1 less 6)		\$ -

Intrastate Access Revenue Support from Other Mechanisms:

8 Connect America Fund (CAF) Intrastate Access Recovery Support	
9 Intrastate Access Revenue Requirement Recovery	\$ -
10 Other:	\$ -
	\$ -
	\$ -
11 Total CAF Recovery Support (Lines 8+9+10)	\$ -

	No. Lines	ARC Charge	Annual ARC Support	Intrastate Allocation	ARC Offset
12 Access Recovery Charge (ARC) Intrastate Access Recovery Support					
12 Residential Lines		\$ -	\$ -		\$ -
13 Single Line Business Lines		\$ -	\$ -		\$ -
14 Multi-Line Business Lines		\$ -	\$ -		\$ -
15 Other: List other lines, if applicable (Line 17)		\$ -	\$ -		\$ -
16 Total ARC Support (Lines 12+13+14+15)		\$ -	\$ -		\$ -

17 Other Recovery Support for Intrastate Access Recovery (List and provide amounts)

Originating						Terminating (a)						
Blue Valley Tariff (7/3/18)		NECA Tariff (7/3/18)	Blue Valley Rate (7/1/19)		Rate Adjustment (7/1/19)	Blue Valley Tariff (7/3/18)		NECA Tariff (7/3/18)	Blue Valley Rate (7/1/19)		Rate Adjustment (7/1/18)	
(A)		(B)	(C)		(D)	(A)		(B)	(C)		(D)	
End Office Local Switching						Transitioned to Bill & Keep pursuant to FCC reforms						
Premium												
RB 1	\$	0.014483	\$	0.014678	\$	0.000195	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 2	\$	0.019313	\$	0.019572	\$	0.000259	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 3	\$	0.024140	\$	0.024464	\$	0.000324	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 4	\$	0.028969	\$	0.029358	\$	0.000389	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 5	\$	0.033797	\$	0.034251	\$	0.000454	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 6	\$	0.038624	\$	0.039143	\$	0.000519	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 7	\$	0.043453	\$	0.044037	\$	0.000584	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 8	\$	0.048282	\$	0.048930	\$	0.000648	\$	0.002133	\$	0.000700	\$	(0.001433)
Non-premium												
RB 1	\$	0.006517	\$	0.006605	\$	0.000088	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 2	\$	0.008691	\$	0.008808	\$	0.000117	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 3	\$	0.010864	\$	0.011010	\$	0.000146	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 4	\$	0.013036	\$	0.013211	\$	0.000175	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 5	\$	0.015209	\$	0.015413	\$	0.000204	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 6	\$	0.017381	\$	0.017614	\$	0.000233	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 7	\$	0.019555	\$	0.019818	\$	0.000263	\$	0.002133	\$	0.000700	\$	(0.001433)
RB 8	\$	0.021727	\$	0.022019	\$	0.000292	\$	0.002133	\$	0.000700	\$	(0.001433)
Information Surcharge (Per 100)						Not Applicable - combined with End Office Rate						
Premium	\$	0.053100	\$	0.053800	\$	0.000700						
Non-premium	\$	0.023800	\$	0.024200	\$	0.000400						
Tandem Transport						Transitioned pursuant to FCC reforms						
Switched Facility												
RB 1	\$	0.000202	\$	0.000204	\$	0.000002	\$	0.000204	\$	0.000204	\$	(0.000204)
RB 2	\$	0.000433	\$	0.000439	\$	0.000006	\$	0.000439	\$	0.000439	\$	(0.000439)
Switched Termination												
RB 1	\$	0.001053	\$	0.001067	\$	0.000014	\$	0.001067	\$	0.001067	\$	(0.001067)
RB 2	\$	0.002247	\$	0.002277	\$	0.000030	\$	0.002277	\$	0.002277	\$	(0.002277)
Switching												
RB 1	\$	0.002655	\$	0.002691	\$	0.000036	\$	0.002691	\$	0.002691	\$	-
RB 2	\$	0.005668	\$	0.005744	\$	0.000076	\$	0.005744	\$	0.005744	\$	-

Originating

IntraState Tariff (7/3/18) (A)	Interstate Tariff (7/3/18) (b) (B)	Intrastate Rate (7/1/19) (C)	Rate Adjustment (7/1/19) (D)
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Terminating (a)

IntraState Tariff (7/3/18) (A)	Interstate Tariff (7/3/18) (b) (B)	Intrastate Rate (7/1/19) (C)	Rate Adjustment (7/1/19) (D)
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Columbus Communications Services, LLC

End Office Local Switching

Premium	\$ 0.011131	\$ 0.011131	\$ 0.011131	\$ -	\$ 0.002133	\$ 0.002133	\$ 0.002133	\$ -
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Information Surcharge (Per 100)	\$ 0.000339	\$ 0.000339	\$ 0.000339	\$ -	Not Applicable - combined with End Office Rate			
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Tandem Switched Transport (RB1)

- Facility	\$ 0.001151	\$ 0.001151	\$ 0.001151	\$ -	\$ 0.000479	\$ 0.000479	\$ 0.000479	\$ -
- Termination	\$ 0.013471	\$ 0.013471	\$ 0.013471	\$ -	\$ 0.001034	\$ 0.001034	\$ 0.001034	\$ -
- Switching	\$ 0.013471	\$ 0.013471	\$ 0.013471	\$ -	\$ 0.001034	\$ 0.001034	\$ 0.001034	\$ -

LaHarpe Telephone Company, Inc.

End Office Local Switching Premium	\$ 0.038484	\$ 0.038484	\$ 0.038484	\$ -	\$ 0.002133	\$ 0.002133	\$ 0.002133	\$ -
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Information Surcharge (Per 100)	\$ 0.002506	\$ 0.002506	\$ 0.002506	\$ -	Not Applicable - combined with End Office Rate			
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Moundridge Telephone Company, Inc.

End Office Local Switching Premium	\$ 0.073477	\$ 0.073477	\$ 0.073477	\$ -	\$ 0.002133	\$ 0.002133	\$ 0.002133	\$ -
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Information Surcharge (Per 100)	\$ 0.080800	\$ 0.080800	\$ 0.080800	\$ -	Not Applicable - combined with End Office Rate			
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Tandem Switched Transport (RB1)

- Facility	\$ 0.000308	\$ 0.000308	\$ 0.000308	\$ -	\$ 0.000202	\$ 0.000202	\$ 0.000202	\$ -
- Termination	\$ 0.001603	\$ 0.001603	\$ 0.001603	\$ -	\$ 0.001053	\$ 0.001053	\$ 0.001053	\$ -
- Switching	\$ 0.004040	\$ 0.004040	\$ 0.004040	\$ -	\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ -

Notes:

(a) Pursuant to the FCC's ICC reforms, interstate and intrastate local-end office switching rates will reduce to bill and keep (\$0.00), effective July 2019.

7/5/2018

Company-Specific
Switched End Office and Transport

	IntraState Tariff (7/3/18) (A)	Interstate Tariff (7/3/18) (B)	Intrastate Rate (7/1/19) (C)	Rate Adjustment (7/1/19) (D)		IntraState Tariff (7/3/18) (A)	Interstate Tariff (7/3/18) (B)	Intrastate Rate (7/1/19) (C)	Rate Adjustment (7/1/19) (D)
<u>Pioneer Telephone Association, Inc.</u>									
End Office Local Switching Premium	\$ 0.021683	\$ 0.021683	\$ 0.021683	\$ -		\$ 0.002133	\$ 0.002133	\$ 0.002133	\$ 0.000000
Information Surcharge (Per 100)	\$ 0.027913	\$ 0.027913	\$ 0.027913	\$ -		Not Applicable - combined with End Office Rate			
Tandem Switched Transport									
- Facility	\$ 0.000153	\$ 0.000153	\$ 0.000153	\$ -		\$ 0.000153	\$ 0.000153	\$ 0.000153	\$ -
- Termination	\$ 0.000795	\$ 0.000795	\$ 0.000795	\$ -		\$ 0.000795	\$ 0.000795	\$ 0.000795	\$ -
- Switching	\$ 0.002012	\$ 0.002012	\$ 0.002012	\$ -		\$ 0.002012	\$ 0.002012	\$ 0.002012	\$ -
<u>Rural Telephone Service</u>									
End Office Local Switching Premium	\$ 0.101297	\$ 0.101297	\$ 0.101297	\$ -		\$ 0.002133	\$ 0.002133	\$ 0.002133	\$ -
Information Surcharge (Per 100)	\$ 0.111429	\$ 0.111429	\$ 0.111429	\$ -		Not Applicable - combined with End Office Rate			
Tandem Switched Transport (RB 1)									
- Facility	\$ 0.000424	\$ 0.000424	\$ 0.000424	\$ -		\$ 0.000202	\$ 0.000202	\$ 0.000202	\$ -
- Termination	\$ 0.002210	\$ 0.002210	\$ 0.002210	\$ -		\$ 0.001053	\$ 0.001053	\$ 0.001053	\$ -
- Switching	\$ 0.005569	\$ 0.005569	\$ 0.005569	\$ -		\$ 0.002655	\$ 0.002655	\$ 0.002655	\$ -
<u>Totah Communications, Inc.</u>									
End Office Local Switching Premium	\$ 0.018946	\$ 0.018946	\$ 0.018946	\$ -		\$ 0.002133	\$ 0.002133	\$ 0.002133	\$ -
Information Surcharge (Per 100)	\$ 0.034700	\$ 0.034700	\$ 0.034700	\$ -		Not Applicable - combined with End Office Rate			
Tandem Switched Transport (RB 1)									
- Facility	\$ 0.000132	\$ 0.000132	\$ 0.000132	\$ -		\$ 0.000132	\$ 0.000132	\$ 0.000132	\$ -
- Termination	\$ 0.000689	\$ 0.000689	\$ 0.000689	\$ -		\$ 0.000689	\$ 0.000689	\$ 0.000689	\$ -
- Switching	\$ 0.001736	\$ 0.001736	\$ 0.001736	\$ -		\$ 0.001736	\$ 0.001736	\$ 0.001736	\$ -

CERTIFICATE OF SERVICE

19-GIMT-006-GIT

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of first class mail/hand delivered on 07/20/2018.

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CERTIFICATE OF SERVICE

19-GIMT-006-GIT

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CERTIFICATE OF SERVICE

19-GIMT-006-GIT

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19-GIMT-006-GIT

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/S/ DeeAnn Shupe

DeeAnn Shupe