

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

Received
on

OCT 19 2011

In the Matter of Staff's Motion Requesting)
the Commission Order S & T Telephone)
Coop Association, Inc. to Submit to an)
Audit for Purposes of Determining its Cost-)
Based Kansas Universal Service Fund)
Support, Pursuant to K.S.A. 66-2008.)

by
State Corporation Commission
of Kansas

Docket No. 12-S&TT-234-KSF

**S & T TELEPHONE COOPERATIVE ASSOCIATION, INC.'S
RESPONSE TO MOTION OF COMMISSION STAFF**

COMES NOW S & T Telephone Cooperative Association, Inc., by and through its attorney Colleen R. Harrell, and for its Response to the "Motion of Commission Staff Requesting the Commission Order S & T Telephone Coop Association, Inc. to Submit to an Audit for Purposes of Determining its Cost-Based Kansas Universal Service Fund Support Pursuant to K.S.A. 66-2008" states as follows:

1. S&T, established in 1952, is a rural incumbent local exchange carrier located in northwest Kansas. S&T serves approximately 2,345 local exchange access lines. The Commission last audited S&T in Docket No. 02-S&TT-390-AUD.

2. On October 7, 2011, Commission staff (Staff) filed a motion requesting the Commission order S & T Telephone Cooperative Association, Inc. (S&T) "to submit to an audit to determine whether its cost-based Kansas Universal Service Fund (KUSF) support should be adjusted, pursuant to K.S.A. 66-2008(e) . . ." Staff's motion states that in both Docket Nos. 10-GIMT-797-GIT, and 11-GIMT-837-GIT, S&T "could not justify the use of either its FUSF or KUSF support given the reporting format adopted by the Commission." In both dockets, Staff recommended the Commission open a "company specific audit proceeding pursuant to K.S.A.

66-117, K.S.A. 66-2008(c), and K.S.A. 66-2008(e) to determine if its KUSF support should be adjusted by the Commission.”

3. S&T stands ready to file any information required by the Commission or requested by its Staff. In the spirit of cooperation and in the best interests of the Commission and its Staff, the company, and the KUSF, S&T suggests using the most current information available as the most prudent and cost-effective course of action. S&T notes that its financial audit will be completed by the first or second week of February 2012, and that the final report on that audit will be available within approximately 30-40 days afterwards.

4. S&T requests the Commission allow it to make the filing deemed necessary by the Commission as soon after the completion of its 2011 audit report as practicable. This will allow Staff to have the most up-to-date information available to S&T, Staff, and both parties’ consultants, while, at the same time, using a 2011 test year. It will provide the most current picture of the company’s operations, processes, and procedures, and will require less updating throughout the course of the proceeding.

5. S&T notes that, historically, Staff has, at the beginning of the review process, provided to companies undergoing a review a group of data requests (DRs). Notwithstanding its request to delay its compliance filing only until such time as the 2011 audited financials are available and it can complete its compliance filing, S&T stands ready to receive and provide answers to DRs as it is able, and prior to making its filing.

6. S&T also notes that, historically, once the Commission has ordered a company to submit to an audit and to make a compliance filing, it has given the company a period of time, typically 45 - 60 days, to prepare its filing. As an example, if the Commission were to issue an order sometime during the middle to end of November 2011, it might order the company to make

its compliance filing sometime during January 2012. If the Commission were to accommodate S&T's reasonable request to only delay the compliance filing to accommodate 2011 audited financials, S&T should be able to make its compliance filing in mid to late March 2012.

7. S&T's request is not designed to unreasonably delay or put off the process of a review by the Commission and its Staff.

WHEREFORE S&T requests the Commission consider the above and allow it to make its compliance filing as soon after its audited financials are available as is practicable, and for such other and further relief as the Commission deems just and equitable.

Respectfully submitted,



Colleen R. Harrell, #16121

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Attorneys for S&T Telephone Cooperative
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VERIFICATION

STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

Colleen R. Harrell, of lawful age being first duly sworn upon oath states:

That she is the attorney for S&T Telephone Cooperative Association, Inc. in this matter, that she has read and is familiar with the foregoing "Response" and that the statements made therein are true and correct to the best of her information, knowledge, and belief.

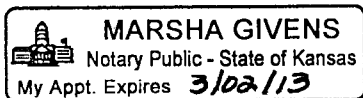

Colleen R. Harrell

Subscribed to and sworn to before me Wednesday, October 19, 2011.



Notary Public

My appointment expires: *March 2, 2013*



CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing "Response" was placed in the United States mail, postage prepaid, this 19th day of October, 2011, to the following:

Matthew Spurgin, Assistant Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604-4027

A handwritten signature in cursive script, reading "Colleen R. Harrell". The signature is written in black ink and is positioned above a horizontal line.

Colleen R. Harrell