

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Audit of TracFone Wireless, Inc.)
by the Kansas Universal Service Fund (KUSF))
Administrator Pursuant to K.S.A. 2018 Supp. 66-2010(b)) Docket No. 20-TFWZ-054-KSF
for KUSF Operating Year 22, Fiscal Year)
March 2018- February 2019.)

STAFF'S MOTION TO COMPEL

COMES NOW the Commission Staff ("Staff") and moves the Commission to issue an Order directing TracFone Wireless, Inc. (TracFone) to respond to Staff Data Requests. In support of the Motion, Staff states:

Background

1. GVNW Consulting, Inc. (GVNW) is the current Administrator for the Kansas Universal Service Fund (KUSF). The KUSF Administrator has statutory responsibilities for collecting and auditing information regarding telecommunication service providers receiving funds from the KUSF.¹ It is also entrusted with the duty to verify funds generated for the KUSF.²

2. On July 25, 2019, the Commission issued an Order in Docket No. 18-GIMT-084-GIT (18-084 Docket) approving modifications to the Carrier Selection Criteria and Audit Procedures for Fiscal Year 22.³ The Order directed GVNW to file the updated Carrier Selection Criteria and Audit Procedures and provide a list of the 16 carriers to be audited for Fiscal Year 22. On July 26, 2019, GVNW responded to the Commission Order by filing the Carrier Selection Criteria and Audit Procedures along with a list of 16 carriers to be audited for Fiscal Year 22,

¹ K.S.A. 2018 Supp. 66-2010(b)(1).

² K.S.A. 2018 Supp. 66-2010(b)(2)

³ Order, Docket 18-GIMT-084-GIT, July 25, 2019.

which includes the period between March 1, 2018 and February 28, 2019.⁴ On August 8, 2019, the Commission issued an Order accepting the Audit Selections and Audit Review Procedures for Fiscal Year 22.⁵

3. On August 15, 2019, the Commission opened the above-captioned Docket and pursuant to the selection list provided by GVNW for Fiscal Year 22, issued an Order designating TracFone for a KUSF audit.⁶ TracFone did not object to the August 15, 2019 Audit Order in this Docket nor to the selection criteria or the Audit Procedures in the 18-084 Docket.

4. On August 19, 2019, GVNW electronically sent audit correspondence with instructions, standard Data Requests and confidentiality disclosures to the contact reference contained in the KUSF Administrator's records for TracFone. The initial 16 standard Data Requests were due on August 28, 2019. GVNW granted extensions of time for TracFone to respond to the Data Requests, with some extensions allowing responses to be provided six weeks after issuance. In response to Data Request Nos. 2, 8, and 9, TracFone did not provide all of the requested information, resulting in GVNW issuing Data Request Nos. 17 and 19. Data Request No. 18 was issued to address significant monthly revenue variances. With respect to Data Request Nos. 17 through 19, TracFone stated it was postponing providing the responses until on-site audit visit by GVNW on January 28-29, 2020.

5. Data Request Nos. 2, 8, 9, 17, 18 and 19 are attached to this Motion and are identified as Attachments 1-6. The requested information is readily available for copying and has been routinely furnished by carriers subject to audit. Data Request Nos. 2 and 9 request journal

⁴ GVNW's Submission of Fiscal Year 22 (FY22) Carrier Audit Selection and Revised Audit Procedures, dated July 23, 2019.

⁵ Order Accepting GVNW's KUSF Year 22 Audit Selections and Revisions to Selection Criteria and Audit Review Procedures, Docket 18-GIMT-084-GIT, August 8, 2019.

⁶ Order to KUSF Administrator to Commence Audit, Docket No. 20-TFWZ-054-KSF, August 15, 2019.

entries or summaries tying the Company's reported revenue and account codes to the Carrier Remittance Worksheets (CRWs). Customer billing and account information, such as customer account statement images, are requested in Data Request Nos. 8, 9, and 17 for GVNW to verify that TracFone did not collect the KUSF surcharge from customers, as it has represented to GVNW. The requested information is necessary in order to conduct a proper and thorough audit, which is placed in jeopardy by a delay in furnishing the information until the conclusion of the field audit process at the time of the on-site review. The delay also violates the KUSF Audit Procedures approved by the Commission on August 8, 2019, and further delineated in the Audit Packet electronically transmitted on August 19, 2019, which sets forth procedures for two 7-day extensions to respond to Data Requests based on good cause.

Extensions

6. Staff further explains the process causing GVNW to extend the response time for the initial set of sixteen Data Requests. On August 28, 2019, GVNW and TracFone, through its point of contact, Scott Myott, exchanged e-mails regarding the outstanding Data Requests submitted by GVNW on August 19, 2019.⁷ Mr. Myott indicated TracFone would need a thirty day extension to respond to the Data Requests as it had 40 active audits to address, vacation schedules, three other state Universal Service Fund audits scheduled ahead of Kansas and mutually agreeable dates for responses were not established prior to submitting the Data Requests. GVNW discussed TracFone's request for a thirty day extension, but advised TracFone that it should prioritize and answer as many Data Requests as possible within fourteen days, with the remaining responses being furnished within thirty days. TracFone did not make a written objection to the Data Requests, as required by the Audit Procedures, but maintains it raised a general objection

⁷ The e-mail exchange is provided in Attachment No. 7 to the Motion to Compel and highlights the process giving rise to a 30-day extension for TracFone to respond.

regarding the Data Requests based on its conflicting work schedule. GVNW communicated it would prepare two additional time approvals to document the extensions. Because TracFone provided inadequate responses to Data Request Nos. 2, 8 and 9, GVNW issued Data Requests Nos. 17 and 19 at the extension period, with responses respectively due November 14 and 22, 2019.

Data Request No. 19

7. On September 24, 2019, TracFone provided a response to Data Request No. 2, including a Chart of Accounts, and descriptions of its control systems and reporting process. It did not provide general ledger journal entries or any other documentation to support the revenue reported on the CRWs and submitted to the KUSF, as requested in Data Request No. 2(d). GVNW issued Data Request No. 19 to provide the missing information. The response was due November 22, 2019, but instead of providing the requested data, Tracfone stated it would submit the information during the on-site review on January 28-29, 2020. TracFone did not seek an extension nor provide a written objection. Because TracFone did not provide the information, its statement on Data Request No. 19 was not responsive. Accordingly, Staff requests an Order compelling TracFone to answer Data Request No. 19 no later than December 20, 2019. TracFone has had more than three months to furnish the information as part of Data Request No. 2, did not supplement its response to Data Request No. 2 as required, and is delinquent in responding to Data Request No. 19. Failure to provide the information on a timely basis will result in a continued delay of the GVNW's audit.

Data Request No. 17

8. Data Request Nos. 8 and 9 requested billing and account information, such as customer account statement images, and was due on August 28, 2019, but extended for thirty days based on the agreement between GVNW and TracFone. The deadline for response was further

extended to October 10, 2019. TracFone provided an insufficient response on October 24, 2019, as no account statement images were supplied. As a follow up, GVNW issued Data Request No. 17, due on November 14, 2019, in an attempt to gather missing information. On November 22, 2019, TracFone replied by stating it would provide the information during the on-site review. TracFone did not provide any information that would be necessary to further the audit process and was not responsive to the Data Request. Accordingly, Staff requests an Order compelling TracFone to answer Data Request No. 17 in a timely manner – no later than December 20, 2019. The delay sought by Tracfone is not in compliance with the Audit Procedures, as no extension was sought or written objection raised. TracFone has had more than three months to furnish the information as part of Data Request Nos. 8 and 9, did not supplement these Data Requests and is delinquent in responding to Data Request No. 17. Failure to provide the information on a timely basis will result in an audit review that is not thorough or complete.

Data Request No. 18

9. Data Request No. 18 was issued to have TracFone explain significant month-to-month variances and was due on November 22, 2019. TracFone responded on November 22, 2019, stating the information would be provided during the on-site review. No extension was requested in conformity with the Audit Procedures, which require good cause for GVNW to grant the same. No written objection was made to the Data Request. Failure to provide the information on a timely basis will result in an audit review that is not thorough or complete. Accordingly, Staff requests an Order compelling TracFone to answer Data Request No. 18 in a timely manner with a response no later than December 20, 2019.

Attempts to Resolve the Dipute

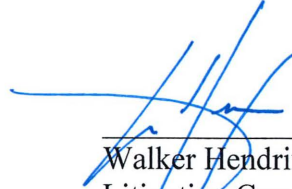
10. On December 5, 2019, GVNW, the Staff and TracFone held a telephone conference to discuss a possible resolution of the discovery issues that have arisen. TracFone maintained it could not respond to Data Request Nos. 17-19 for another month and requested permission to respond by January 18, 2019.⁸ TracFone stated it verbally provided a blanket objection to all Data Requests submitted by GVNW and advised GVNW that it needs a minimum of 30 days to respond to discovery. TracFone maintains it responded to all Data Requests, but as noted by the Staff the replies were insufficient and did not supply the requested information. TracFone has been dilatory in responding to GVNW Data Requests and has failed to provide information within a reasonable timeframe and states it cannot respond to any Data Request on less than 30-day notice. TracFone's position is unreasonable and creates undue delay. The requested information is needed to further the audit process, and GVNW has to balance its time with regard to the TracFone audit with the other carriers the Commission had designated for review. The Staff indicated to TracFone that it would file a Motion to Compel, if responses were not received by December 13, 2019, with the Commission determining a firm date for the responses in advance of the on-site review. Staff also seeks a firm response time with respect to all other Data Requests that may be issued in the audit process to permit a proper analysis of the Company's records and allow sufficient time to provide follow-up discovery, if necessary, to enable a thorough and complete audit.

WHEREFORE, Staff moves the Commission for an Order compelling Tracfone Wireless, Inc. to answer Data Request Nos. 17-19 by December 20, 2019, or a date determined by the Commission, which coincides with a time interval that permits sufficient analysis, discovery and review to prepare a thorough and complete Audit Report. Staff also requests the Commission address

⁸ Attachment 8 includes an e-mail transmitted by Scott Myott and behalf of TracFone stating it would respond by Friday, January 18, 2020.

TracFone's verbal objection to Data Requests and its position that it will need 30 days to respond to any discovery and granting such other and further relief as the Commission deems just and proper.

Respectfully Submitted,



Walker Hendrix, 08835
Litigation Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027
Phone: 785-271-3157
Fax: 785-271-3167

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

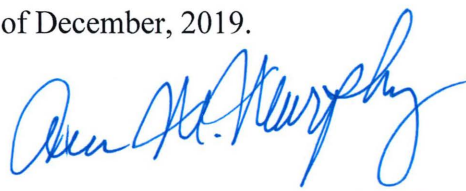
VERIFICATION

Walker Hendrix, being duly sworn upon his oath deposes and states that he is a Litigation Counsel for Litigation Counsel of the Kansas Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Motion to Compel* and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Walker Hendrix, 08835
Litigation Counsel
Kansas Corporation Commission

Subscribed and sworn to before me this 9th day of December, 2019.



ATTACHMENT 1

KUSF Carrier Audit Information Request

Submitted By: Dennis Smith
Submitted To: Scott Myott
Company Name: TracFone Wireless, Inc.
Docket Number: 20-TFWZ-054-KSF
Request Date: August 19, 2019
Due Date: **August 28, 2019**

Request No. 2

RE: Company Records

Please provide the following information:

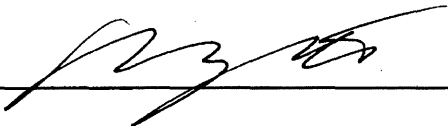
- a. The Company's Chart of Accounts. **See attached COA.**
- b. Documentation identifying the control systems in place to ensure correct reporting of Kansas retail revenues and KUSF assessment surcharges to customers, including supervisory reviews/approvals, journalizing/booking process controls. Provide documents that support a validation of these systems, i.e., printouts or copies of revenues as they go through the system. **TracFone reports revenue from the sale of prepaid calling cards on Line 9 of the CRW per the instructions provided by GVNW.**
- c. Aging of Accounts Receivable report for the three (3) sample months. **Not Applicable. Aging of A/R does not affect the CRWs because TracFone does not report any uncollectible amounts on Line 12 of the CRWs.**
- d. Monthly billing summaries and general ledger journals entries that support the Kansas revenues and uncollectibles reported on the Carrier Remittance Worksheets (CRW). **TracFone resells cellular wireless airtime on a prepaid basis. Therefore, TracFone does not issue bills to customers. Allowances for bad debts and write-offs do not affect the CRWs because TracFone does not report any amounts on Line 12 of the CRWs.**

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR2

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

KUSF Carrier Audit Information Request

Signed: 

Date: 9-18-19

ATTACHMENT 2

KUSF Carrier Audit Information Request

Submitted By: Dennis Smith
Submitted To: Scott Myott
Company Name: TracFone Wireless, Inc.
Docket Number: 20-TFWZ-054-KSF
Request Date: August 19, 2019
Due Date: **August 28, 2019**

Request No. 8

RE: Customer Bills or Billing Images

Bills include, but are not limited to: any means of communications via any medium, including: paper, electronic, or online information, whether such information is emailed, mailed, online information the consumer must log-on to see, or otherwise used to communicate with the consumer and regardless of the means the subscriber pays such bill:

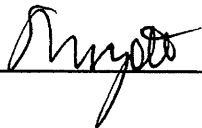
- a. Ten (10) Residential and ten (10) Business customer bills or billing images for each of the three (3) selected review months (total of 60). Please include bills that reflect both interstate and intrastate jurisdictional charges if your company offers both intrastate and interstate (e.g. local and long-distance) services.

TracFone resells cellular wireless airtime on a prepaid basis. Therefore, TracFone does not issue bills to customers.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR8

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: 

Date: 10-24-19

ATTACHMENT 3

KUSF Carrier Audit Information Request

Submitted By: Dennis Smith
Submitted To: Scott Myott
Company Name: TracFone Wireless, Inc.
Docket Number: 20-TFWZ-054-KSF
Request Date: August 19, 2019
Due Date: **August 28, 2019**

Request No. 9

RE: Data Request No. 8, KUSF Surcharge Calculation

Bills include, but are not limited to: any and all means of communications via any medium, including: paper, electronic, or online information, whether such information is emailed, mailed, online information the consumer must log-on to see, or otherwise used to communicate with the consumer and regardless of the means the subscriber pays such bill:

Please provide the following information:

- a. Five business bills for each test month showing the calculation of how the KUSF surcharge collected from the customer was derived.
- b. Five residential subscriber bills for each test month showing the calculation of how the KUSF surcharge collected from each customer was derived.
- c. A detailed explanation of the line items shown on the customers' bills or billing images that are used to calculate the KUSF surcharge shown on the invoice.

Please use sample bills provided in response to DR No. 8 to illustrate the calculation of the KUSF surcharge.

TracFone resells cellular wireless airtime on a prepaid basis. Therefore, TracFone does not issue bills to customers. TracFone does not collect the KUSF surcharge from customers.

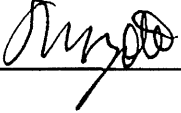
NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR9

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best

KUSF Carrier Audit Information Request

of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: 

Date: 10-24-19

ATTACHMENT 4

KUSF Carrier Audit Information Request

Submitted By: Dennis Smith
Submitted To: Scott Myott
Company Name: TracFone Wireless, Inc.
Docket Number: 20-TFWZ-054-KSF
Request Date: November 4, 2019
Due Date: November 14, 2019

Request No. 17

RE: Request for Correction of Incomplete or Inadequate Information Provided

DRs No. 8 & 9 requested customer bills or billing images. As DR No. 8 explains, the billing images are not limited to bills or invoices, but **include any such information that is emailed, mailed, made available online, etc. that the consumer/customer is able to view and that is used to communicate the cost of a service and the service provided.**

1. Please provide the ten (10) residential and ten (10) business customer bills or billing images (as described above) for each of the three (3) selected review months (April 2018, May 2018, & January 2019; total of 60 images), as requested by DR No. 8.a.
2. Please provide five (5) examples for each test month showing the calculation of how the KUSF surcharge collected from the customer was derived.

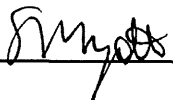
If "billing images" are to be provided/reviewed/discussed during the on-site visit, please indicate as such.

TracFone: A response will be provided during the on-site visit.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR17

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: _____


Date: _____
11-22-19

ATTACHMENT 5

KUSF Carrier Audit Information Request

Submitted By: Dennis Smith
Submitted To: Scott Myott
Company Name: TracFone Wireless, Inc.
Docket Number: 20-TFWZ-054-KSF
Request Date: November 12, 2019
Due Date: **November 22, 2019**

Request No. 18

RE: Request for Explanation of Variance

Please provide an explanation of the variances between revenues reported on the following CRWs:

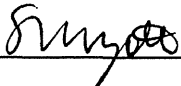
- April 2017 \$1,346,521.41 May 2017 \$1,043,215.77 (22.53%)
- February 2018 \$1,112,733.66 March 2018 \$1,243,523.13 11.75%

TracFone: A response will be provided during the on-site visit.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR18

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: 

Date: 11-22-19

ATTACHMENT 6

KUSF Carrier Audit Information Request

Submitted By: Dennis Smith
Submitted To: Scott Myott
Company Name: TracFone Wireless, Inc.
Docket Number: 20-TFWZ-054-KSF
Request Date: November 13, 2019
Due Date: **November 22, 2019**

Request No. 19

RE: Request for Correction of Incomplete or Inadequate Information Provided

DRs No. 2.b. requested the following:

- d. **Monthly billing summaries and general ledger journal entries that support the Kansas revenues and uncollectibles reported on the Carrier Remittance Worksheets (CRW).**


In other words, provide the documentation that was used to complete and report the KUSF CRWs for the audit test months of April 2018, May 2018, and January 2019.

TracFone: A response will be provided during the on-site visit.

NOTE: If for some reason, the above information cannot be provided by the date requested, your Company must submit a Request for Additional Time.

Verification of Response – DR19

I have read the foregoing Data Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to GVNW's auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Signed: 

Date: 11-22-19

ATTACHMENT 7

Walker Hendrix

From: Dennis C. Smith <dsmith@gvnw.com>
Sent: Wednesday, August 28, 2019 3:22 PM
To: 'Scott Myott'
Subject: RE: {External} RE: Request for Extension

Thanks Scott. I'll have 2 Requests for Additional Time Approvals drafted, as suggested in the previous email.

Dennis C. Smith | GVNW Consulting, Inc.
2930 Montvale Drive | Suite B | Springfield, IL 62704 Direct 217.862.1938 | Office 217.698.2700 www.gvnw.com |
dsmith@gvnw.com

-----Original Message-----

From: Scott Myott <smyott@tracfone.com>
Sent: Wednesday, August 28, 2019 3:10 PM
To: Dennis C. Smith <dsmith@gvnw.com>
Subject: [EXTERNAL] Re: {External} RE: Request for Extension

Certainly you can say that for today. You understand I'm out of the office and I will be glad to settle the dates next week when I return to the office. Mr. Dillon is also out of the office. Thank you.

Sent from my iPhone

> On Aug 28, 2019, at 3:22 PM, Dennis C. Smith <dsmith@gvnw.com> wrote:

>

> Hi Scott,

>

> KCC Staff has requested that you prioritize a number of DR responses to be provided with a 14 day extension, with the remainder deliverable with a 30 day extension. For example, DR No 1 - 4 deliverable on 9/18/19, and DR No 5 - 16 deliverable on 10/10/19.

>

> I'll await your response.

>

> Thank you.

>

> Dennis C. Smith | GVNW Consulting, Inc.

> 2930 Montvale Drive | Suite B | Springfield, IL 62704 Direct

> 217.862.1938 | Office 217.698.2700 www.gvnw.com | dsmith@gvnw.com

>

>

>

>

> -----Original Message-----

> From: Scott Myott <smyott@tracfone.com>

> Sent: Wednesday, August 28, 2019 1:06 PM

> To: Dennis C. Smith <dsmith@gvnw.com>

> Cc: Dawn Cartellone <dcartellone@gvnw.com>

> Subject: [EXTERNAL] Request for Extension

>

> Hello Dennis,

>

> At this time Tracfone is not able to provide any responses to the Kansas USF audit DRs 1-16 for the following reasons:

> The contact person at Tracfone is out of the office from August 24 - September 2.

> Tracfone has over 40 active audits.

> Tracfone has three active and previously scheduled state regulatory USF audits that were scheduled prior to the Kansas audit.

> GVNW did not contact Tracfone to schedule the audit and the DR response dates at a mutually agreeable date.

> For the above reasons Tracfone respectfully requests an initial extension of 30 days to respond to the DRs.

>

> Thank you for your consideration.

>

> Scott Myott

> Senior Tax Manager

>

> Sent from my iPhone

> _____

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>

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> _____

ATTACHMENT 8

Walker Hendrix

From: Scott Myott <smyott@tracfone.com>
Sent: Thursday, December 5, 2019 2:46 PM
To: Sandy Reams
Cc: Stephen Athanson; Walker Hendrix; Dennis C. Smith
Subject: RE: Kansas USF FY22 audit of TracFone Wireless

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

Hello Sandy,

In response to our phone call today, I wanted to confirm that TracFone plans to respond to DR's 17-19 on or before Friday, January 18, 2020. Thank you for taking the time to discuss the status of the Kansas USF FY22 audit.

Scott Myott | Senior Tax Manager | **TracFone Wireless, Inc.** | O: 305.715.6778

CERTIFICATE OF SERVICE

20-TFWZ-054-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Motion to Compel was served via electronic service this 9th day of December, 2019, to the following:

DENNIS C SMITH
GVNW CONSULTING, INC.
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
Fax: 719-594-5803
dsmith@gvnw.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
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Ann Murphy