

LAW OFFICES
JAMES M. CAPLINGER, CHARTERED
823 S.W. 10TH AVE.
TOPEKA, KS 66612-1618

JAMES M. CAPLINGER (1929 – 2015)
JAMES M. CAPLINGER, JR.
COLLEEN R. JAMISON

(785) 232-0495
Fax (785) 232-0724
jrcaplinger@caplinger.net
colleen@caplinger.net

June 29, 2018

Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 Arrowhead Rd
Topeka, KS 66604

RE: Docket 18-GIMT-394-GIT
Section 254(e) certifications

Dear Ms. Retz:

On behalf of Tri-County Telephone Association, Inc., attached please find for filing in Docket No. 18-GIMT-394-GIT the 254(e) certifications required by the Commission to be filed in this docket by July 2, 2018.

In this filing, Attachment 2a, lines 240, 245, and 255 as well as the entirety of Attachment 4 has been marked as confidential; this information is confidential commercial information and, as such, its disclosure to any person other than the company, the Commission, and Staff is prohibited by K.S.A. 66-1220a. The Commission has not issued a protective order in this docket. As always, if you have any questions, please do not hesitate to contact me.

Cordially yours,



Colleen R. Jamison

cc: Dale Jones

Encl.

Attachment 1

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Chair Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Pat Apple

In the Matter of Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 18-GIMT-394-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 appropriate support received)

1. My title is CEO of Tri-County Telephone Association Inc. In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), Connect America Fund (CAF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding Tri-County Telephone Association Inc. to the statements made in this certification.

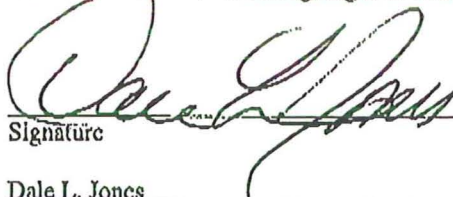
2. Tri-County Telephone Association Inc. was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 98-GMIT-241-GIT by order dated December 5, 1997 and KUSF support purposes in Docket No. 98-GMIT-241-GIT by order dated December 5, 1997.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by Tri-County Telephone Association Inc. was used in the proceeding calendar year 2017 and will be used in the new calendar year 2019 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Telecommunications Act, and/or Kansas statutes and KCC requirements.

Attachment 1

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

Dale L. Jones

Printed/Typed Name

Executed on 6/26/18 date.

Email address: djoncs@tctainc.net

Company Name: Tri-County Telephone AssociationDATA YEAR: 2017

| | LINE | REGULATED AMOUNT |
|----------------------------------|----------|---------------------|
| WORKING LOOPS | | |
| 1. Total Loops | (060) | 2,675 |
| 2. Category 1.3 Loops | (070) | 2,671 |
| INVESTMENT | | |
| 1. Plant Accounts | | |
| a. Acct 2001 | (160) \$ | 59,301,033 |
| 2. Selected Plant Accounts | | |
| a. Acct 2210 | (230) | 540,988 |
| b. Acct 2220 | (235) | 0 |
| c. Acct 2230 | (240) | |
| d. Total Central Office Equip | (245) | |
| e. Circuit Equip Cat 4.13 | (250) | 6,243,564 |
| f. Acct 2410 | (255) | |
| AMORTIZABLE TANGIBLE ASSETS | | |
| Acct. 2680 Tot Assets | (800) | 0 |
| Acct. 2680 (2230) COE Trans | (805) | 0 |
| Acct. 2680 (Cat. 4.13) COE Trans | (810) | 0 |
| Acct. 2680 (2410) Total CWF | (815) | 0 |
| Acct. 2680 (2410) CWF-Cat 1 | (820) | 0 |
| Acct. 6560 (2680) Dep & Amort | (830) | 0 |
| PART 36 - COST STUDY DATA | | |
| 1. Cost Study Avg C&WF Acct 2410 | (700) | 44,314,575 |
| 2. Cost Study Avg C&WF Cat 1 | (710) | 41,509,751 |
| 3. C&WF CAT 1 Factor | | 0.936707 |
| 4. COE CAT 4.13 Factor | | 0.590251 |
| 5. Switching Factor | | 1.000000 |

Company Name: Tri-County Telephone Association

DATA YEAR: 2017

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

| INVESTMENT, EXPENSE AND TAXES | LINE | REGULATED AMOUNT |
|---|-------|---------------------|
| 1. Selected Plant Accounts | | |
| a. Acct 2230 | (240) | |
| b. Total Central Office Equip | (245) | |
| c. Acct 2410 (Total) | (255) | |
| 2. Expenses - Plant Specific Exp | | |
| a. Acct 6110 | (335) | 16,989 |
| b. Acct 6110 (benefits) | (340) | 627 |
| c. Acct 6110 (rents) | (345) | 0 |
| d. Acct 6120 | (350) | 417,920 |
| e. Acct 6120 (benefits) | (355) | 84,747 |
| f. Acct 6120 (rents) | (360) | 0 |
| g. Acct 6210 | (365) | 119,088 |
| h. Acct 6210 (benefits) | (370) | 77 |
| i. Acct 6210 (rents) | (375) | 0 |
| j. Acct 6220 | (380) | 0 |
| k. Acct 6220 (benefits) | (385) | 0 |
| l. Acct 6220 (rents) | (390) | 0 |
| m. Acct 6230 | (395) | 53,282 |
| n. Acct 6230 (benefits) | (400) | 9,812 |
| o. Acct 6230 (rents) | (405) | 0 |
| p. (sum of lines 365+380+395) | (410) | 172,370 |
| q. Acct 6410 | (430) | 767,534 |
| r. Acct 6410 (benefits) | (435) | 184,121 |
| s. Acct 6410 (rents) | (440) | 0 |
| t. Total Expenses Accts. 6110 - 6410 | (445) | \$ 1,374,813 |
| 3. Expenses - Plant Non Specific Exp | | |
| a. Acct 6530 | (450) | 138,341 |
| b. Acct 6530 (benefits) | (455) | 124,597 |
| 4. Depreciation & Amortization Exp | | |
| a. Acct 6560 (#2210) | (510) | 64,581 |
| b. Acct 6560 (#2220) | (515) | 0 |
| c. Acct 6560 (#2230) | (520) | 158,027 |
| d. Acct 6560 (#2210-2230) | (525) | \$ 222,608 |
| e. Acct 6560 (#2410) | (530) | 2,535,447 |
| 5. Corporate Operating Expenses | | |
| a. Acct 6710 | (535) | 183,690 |
| b. Acct 6710 (benefits) | (540) | 36,726 |
| c. Acct 6720 | (550) | 905,999 |
| d. Acct 6720 (benefits) | (555) | 181,962 |
| e. Total Corporate Operating Expense (line 535+550) | (565) | \$ 1,089,689 |
| 6. Other Expenses and Revenues | | |
| a. Benefits Portion | (600) | 907,267 |
| b. Rents Portion | (610) | 0 |
| Sum of All Expenses (Excluding Depreciation) | | \$ 2,602,843 |
| 7. Taxes | | |
| a. Acct 7200 | (650) | 270,782 |

| | |
|---|---------|
| Company Name: <u>Tri-County Telephone Association</u> | |
| DATA YEAR: 2017 | |
| Test for use of FUSF & KUSF | |
| CAPITAL: | |
| 1. Category 1 C&WF | 139,391 |
| 2. Category 4.13 COE and Switching | 254,178 |
| MAINTENANCE: | |
| 3. CWF - MAINT. EXP. | 546,487 |
| 4. COE - MAINT. SW | 119,010 |
| 5. COE - MAINT-OP SYSTEM | - |
| 6. COE - MAINT. - TRANS. | 27,042 |
| 7. CWF - NETWORK SUPPORT | 11,453 |
| 8. COE - NETWORK SUPPORT | 1,872 |
| 9. CWF GENERAL SUPPORT | 233,216 |
| 10. COE GENERAL SUPPORT | 38,118 |
| 20. CWF NETWORK OPERATION | 9,621 |
| 21. COE NETWORK OPERATION | 1,572 |
| 22. CWF EXEC. & PLANNING | 102,873 |
| 23. COE EXEC. & PLANNING | 16,814 |
| 24. CWF GENERAL ADMIN. | 506,814 |
| 25. COE GENERAL ADMIN. | 82,836 |
| 26. CWF OPERATING TAXES | 189,543 |
| 27. COE OPERATING TAXES | 30,980 |
| 28. CWF BENEFITS - TTL OPER EXP | 635,073 |
| 29. COE BENEFITS - TTL OPER EXP | 103,799 |
| 30. CWF RENTS - TTL OPER EXP | 0 |
| 31. COE RENTS - TTL OPER EXP | 0 |

| | |
|--|--------------------------|
| Company Name: <u>Tri-County Telephone Association</u> | |
| DATA YEAR: <u>2017</u> | |
| A. Total Cash Expenditures Associated with USF | 3,050,693 |
| B. Certified Federal USF Receipts: | |
| B1. High Cost Loop Support / Frozen High Cost Support | 3,820,470 |
| B2. Safety Net Support | |
| B3. Broadband Loop Support | |
| B4. Safety Valve Support for acquired Exch. | |
| B5. Connect America Cost Model | |
| B6. Alternative Connect America Model | |
| B7. CAF ICC (§§ 51.915, 51.917, 51.304) | |
| B8. Total Certified Federal USF Receipts | \$ 3,820,470 |
| C. KUSF Receipts | 1,372,572 |
| D. Total FUSF and KUSF Receipts | 5,193,042 |
| E. Do Expenditures Exceed FUSF Receipts? | No |
| Amount Expenditures Exceed Certified FUSF (negative number means FUSF exceeds Expenditures) | \$ (769,777.45) [A - B8] |
| F. Do Expenditures Exceed FUSF & KUSF Receipts? | No |
| Amount Expenditures Exceed Certified FUSF and/or KUSF (negative number means FUSF/KUSF exceeds Expenditures) | (2,142,349) [A - D] |
| Please provide the following information: | |
| Contact: <u>Daniel Meszler</u> | |
| Title: <u>Senior Regulatory Consultant</u> | |
| Phone No.: <u>719-266-4334</u> | |
| E-Mail: <u>dmeszler@tcatel.com</u> | |

18-GIMT-394-GIT
Attachment 4

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

Data Year: 2017

NOTES:

This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255).

E-Mail: dmeszler@tcatel.com

18-GIMT-394-GIT
Attachment 4

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

Supplemental
PagesPage 2

18-GIMT-394-GIT
Attachment 6Annual ETC Certification of Requirements Imposed by the
Commission in Docket Number 06-GIMT-446-GIT

1. All ETCs must provide detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 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 CFR 4.5(c).

| 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 |
|--------------------------------------|--|------------------------------|---------------------------|--|------------------------------|
| N/A | | | | | |

(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.

Zero

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

Zero

18-GIMT-394-GIT
Attachment 6

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

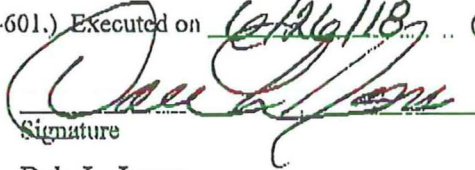
KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is CEO of the Tri-County Telephone Association Inc. 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 Tri-County Telephone Association Inc. to the statements made in this certification.

2. By this affidavit, I certify that Tri-County Telephone Association Inc. 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 6/26/18 (date).


 Signature

Dale L. Jones

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

18-GIMT-394-GIT
Attachment 6

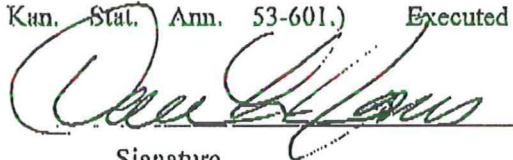
5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2).

ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

1. My title is CEO of the Tri-County Telephone Association Inc. 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 Tri-County Telephone Association Inc. to the statements made in this certification.

2. By this affidavit, I certify that Tri-County Telephone Association Inc. 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 6/26/18 (date).



Signature

Dale L. Jones

Printed / Typed Name

6. 47 U.S.C. § 214(c)(1)(B) requires every ETC to advertise its 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 |
|--------------------------|---------------|---|-----------------|
| TCT Telephone Directory | Directory | Dickinson, Morris and Marion Counties, Kansas | April, 2017 |
| www.tctelco.net | Website | Worldwide | Ongoing |
| Teletalk | Newsletter | Dickinson, Morris and Marion Counties, Kansas | Monthly, 2017 |
| Electronic Newsletter | Direct Email | Dickinson, Morris and Marion Counties, Kansas | Monthly, 2017 |
| Abilene Reflector | Newspaper | Dickinson County, Kansas | Monthly, 2017 |
| Herington Times | Newspaper | Dickinson County, Kansas | Monthly, 2017 |
| Prairie Post | Newspaper | Morris County, Kansas | Monthly, 2017 |
| Council Grove Republican | Newspaper | Morris County, Kansas | Monthly, 2017 |

Attachment 6

(If necessary, please attach additional pages.)

1. NAME _____
 2. DATE _____
 3. TIME _____
 4. PLACE _____
 5. REASON _____
 6. WITNESSES _____
 7. SIGNATURE _____
 8. DATE _____
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 218. DATE _____
 219. TIME _____
 220. PLACE _____
 221. REASON _____
 222. WITNESSES _____
 223. SIGNATURE _____

(Please type or print legibly)

4 of 5

18-GIMT-394-GIT

Attachment 6

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. §3-601.) Executed on
_____ (date).

Signature

Printed/Typed Name