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March 15, 2018

Via Electronic filing

Chief Clerk
Kansas Corporation Commission
Utilities Division
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: Docket No. 17-GIMT-008-GIT

Dear Sir or Madam:

This filing is made to complete the March 6, 2018, Traffic Factor Methodology filing of Boomerang Wireless, LLC for Allocation of Revenues to the Kansas Intrastate Jurisdiction. Please contact me directly should you have any questions or comments regarding this matter, or need additional information. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "J. Andrew Gipson".

J. Andrew Gipson

JAG/ssb
Attachment

cc: Sandy Reams
Julia Redman-Carter

{JX311188.2}

JONES WALKER LLP

ALABAMA * ARIZONA * DISTRICT OF COLUMBIA * FLORIDA * GEORGIA * LOUISIANA * MISSISSIPPI * NEW YORK * TEXAS

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

In the Matter of an Investigation)	
To Determine the Assessment Rate and the)	
Affordable Local Service Rate for)	Docket No. 17-GIMT-073-GIT
Rate of Return; Regulated Carriers for the)	
Nineteenth Year of the Kansas Universal)	
Service Fund)	

**TRAFFIC FACTOR METHODOLOGY OF BOOMERANG WIRELESS, LLC FOR
ALLOCATION OF REVENUES TO THE KANSAS INTRASTATE JURISDICTION**

COMES NOW, Boomerang Wireless, LLC, (“Petitioner” or “Boomerang”) through its undersigned counsel, and herein submits the following information requested by the Commission in the above designated matter.

From the time Boomerang began offering Lifeline service in Kansas as an Eligible Telecommunications Carrier (“ETC”), for purposes of the Kansas Universal Service Fund (“KUSF”) Boomerang has relied on the inverse of the safe harbor percentage factor as submitted by Boomerang to the Federal Universal Service Fund. Ready Wireless, a Mobile Virtual Network Enabler (“MVNE”) and affiliate of Boomerang, provides services to Boomerang which includes billing record services.

In January 2017, Ready Wireless, within the scope of services provided to Boomerang, began using the Boomerang traffic study to determine the Percent Interstate Usage (“PIU”) for Boomerang rather than using the intrastate safe harbor of 62.9%. Per the traffic study for 2017, the Boomerang PIU was 14%, which left 86% for intrastate. This was reflected on the 499 for all of 2017 for the entire Boomerang customer base.

During 2017, Ready Wireless, as service provided to Boomerang, also implemented an Optimization process that separates voice services from data and text services. As such,

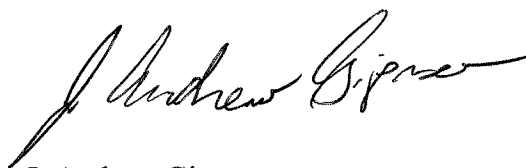
Boomerang pays into KUSF based on voice services that are subject to the KUSF surcharge. Ready Wireless began implementing the Optimization process for Boomerang at mid-year 2017 and it was in full use in November 2017.

Effective January 13, 2018, Ready Wireless completed a new traffic study for Boomerang for 2018. According to this traffic study, Boomerang's PIU is 14.8%. Thus, for 2018, Boomerang proposes to use the inverse percentage of 85.2% for intrastate.

WHEREFORE, Petitioner respectfully requests the Commission receive this pleading and the accompanying affidavit and grant Boomerang's request to use the traffic study methodology described herein for 2017 and 2018. Petitioner further requests such other relief as may be necessary and appropriate under these circumstances.

This the 15th day of March, 2018

Respectfully submitted,



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AFFIDAVIT

STATE OF Iowa

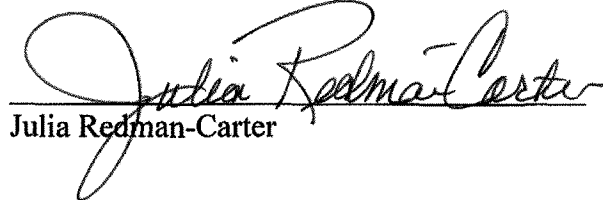
COUNTY OF Linn

I, Julia Redman-Carter, being over the age of 18 and duly sworn upon oath, depose and say the following:

1. I, Julia Redman-Carter, am the Compliance Officer of Boomerang Wireless, LLC and am authorized to execute this Affidavit on its behalf. I am knowledgeable of the methods and procedures used by the company to determine assessable revenues for the Kansas Universal Service Fund ("KUSF") and to the Federal Universal Service Fund ("FUSF").

2. I hereby confirm that the company began using the traffic factor methodology in 2017 as described in the attached pleading. Prior to implementing this methodology the Company was using the Safe Harbor Percentage Factor. The Company hereby verifies that it is using this same methodology in filings with the Federal Communications Commission.

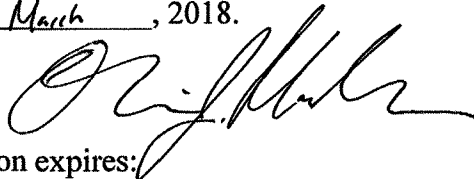
2. The foregoing Petition is true and correct to the best of my information, knowledge and belief.


Julia Redman-Carter

Dated: 3/15/2018

Sworn to and subscribed before me this
15 day of March, 2018.

Notary Public



My Commission expires:

