

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

Before Commissioners:                    Andrew J. French, Chairperson  
   Dwight D. Keen, Commissioner  
   Annie Kuether, Commissioner

In the Matter of a General Investigation Into                    )  
the Adjustment of Intrastate Switched Access                    )  
Charges for Rural Telephone Companies in                    )                    Docket No. 25-GIMT-164-GIT  
Compliance with K.S.A. 66-2005(e) and                    )  
Federal Communications Commission                    )  
Reforms                    )

**ORDER OPENING DOCKET; REQUIRING COMPLIANCE FILINGS**

NOW, the above captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the files and records and being duly advised in the premises, the Commission finds as follows:

**Background**

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."<sup>1</sup>

2.        The purpose of this docket is to address the Rural Local Exchange Carriers' (RLECs), as defined by K.S.A. 66-1,187 and 47 U.S.C. § 153(44), intrastate switched access rate, revenue, and Kansas Universal Service Fund (KUSF) support adjustments.

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<sup>1</sup> KUSF refers to the Kansas Universal Service Fund. See K.S.A. 66-2008.

## **Jurisdiction and Authority**

3. The Commission holds full power, authority, and jurisdiction to supervise and control the local exchange carriers pursuant to K.S.A. 66-1,188. Their rates must be just and reasonable pursuant to K.S.A. 66-1,189 and filed with the Commission pursuant to K.S.A. 66-1,190.

4. K.S.A. 66-2005(c) specifically addresses the intrastate switched access rate adjustments and corresponding KUSF modifications at issue in this proceeding.

## **Staff's Report and Recommendation**

5. Commission Staff (Staff) submitted a Report and Recommendation (R&R) regarding this matter dated September 25, 2024, attached hereto as Exhibit A, and made a part hereof by reference.

6. Staffs 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.

7. The most pertinent rulings with respect to the Commission's administration of this matter include: 1) the Commission utilizes July 1 rather than March 1 in order to coincide with the FCC's reforms to intercarrier compensation;<sup>2</sup> 2) RLECs are required to adjust their intrastate rates subject to FCC reforms annually pursuant to FCC rules and adjust intrastate rates not subject to FCC reforms to parity in odd-numbered years;<sup>3</sup> and 3) RLECs' intrastate access revenue reductions are to be offset by Access Recovery Charge (ARC) and Connect America Fund (CAF) support from the FCC pertaining to intrastate access revenue recovery.<sup>4</sup>

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<sup>2</sup> Exhibit A, p. 3.

<sup>3</sup> Id.

<sup>4</sup> Id. at 4.

8. Staff explains that the adjustment to an RLEC's intrastate access revenue and annual KUSF support will be based on the difference between its interstate and intrastate access rates as of July 1, 2024, and the access minutes of use (MOU) for the twelve-month period ending June 30, 2024.<sup>5</sup>

9. In order to determine the necessary rates and KUSF modifications, Staff recommends the Commission require the RLECs to submit the data identified in Attachment 1 to its R&R, a copy of which will be placed on the Commission's website at <https://kcc.ks.gov/telecommunications/service-provider-forms>.<sup>6</sup>

10. Staff recommends the Commission open a docket 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. Staff recommends the following procedural schedule for this matter:

- a. RLECs file Attachment 1 and interstate tariff in Docket, submit Excel copy to Staff by no later than November 18, 2024;
- b. Staff shall submit a Report and Recommendation by no later than December 16, 2024;
- c. Responses to Staff's Report and Recommendation shall be due no later than December 30, 2024;
- d. Commission Order shall be issued no later than January 9, 2024, with new rates being effective July 1, 2025.

### **Findings and Conclusions**

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

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<sup>5</sup> Id. at 2.

<sup>6</sup> Then open the link titled "RLEC Intrastate Access Form, Attachment 1 (Excel format)."

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

A. This Docket is opened for the purposes of administering K.S.A. 66-2005(c)'s requirement for the RLECs to implement adjustments to their access rates in odd-numbered years.

B. All RLECs, as defined by K.S.A. 66-1,187 and 47 U.S.C. § 153(44), are made parties to this docket. Parties that enter their appearance shall provide an e-mail address and indicate whether they consent to electronic service.

C. RLECs shall file in this Docket a completed Attachment 1 by November 18, 2024. RLECs shall also e-mail a Microsoft Excel version of Attachment 1 to Staff by the same date, attention Steve Garrett: [s.garrett@ks.gov](mailto:s.garrett@ks.gov), and Hemant Bhagat: [hemant.bhagat@ks.gov](mailto:hemant.bhagat@ks.gov). An electronic copy of Attachment 1 can be downloaded from the Commission's website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>. RLECs do not need to serve Attachment 1 on any other party - only file it in the Docket and provide a copy to Staff by the required due date. Any RLEC with its own non-NECA interstate tariff is directed to provide a copy of or link to its July 1, 2024, interstate tariff to Staff concurrent with filing Attachment 1 in the Docket.

D. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).<sup>7</sup>

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<sup>7</sup> K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 10/10/2024



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Lynn M. Retz  
Executive Director



1500 SW Arrowhead Road  
Topeka, KS 66604-4027

Phone: 785-271-3100  
Fax: 785-271-3354  
<http://kcc.ks.gov/>

Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

Laura Kelly, Governor

## REPORT AND RECOMMENDATION UTILITIES DIVISION

**TO:** Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

**FROM:** Steve Garrett, Deputy Chief of Telecommunications  
Hemant Bhagat, Senior Telecommunications Analyst  
Jeff McClanahan, Director of Utilities

**DATE:** September 25, 2024

**SUBJECT:** Docket No. 25-GIMT-164-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**

Staff recommends the Commission issue an order to open a docket to address the rural local exchange carriers' (RLECs) intrastate switched access rate, revenue, and Kansas Universal Service Fund (KUSF) support adjustments consistent with K.S.A. 66-2005(c) and the Federal Communications Commission's (FCC's) access reforms. Staff recommends each RLEC be directed to complete and file Attachment 1 in the Docket and provide Staff an Excel copy at [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov) and [hemant.bhagat@ks.gov](mailto:hemant.bhagat@ks.gov) on or before November 18, 2024. Staff recommends Attachment 1 be available for download from the Commission's website at: <https://kcc.ks.gov/telecommunications/service-provider-forms>, and that an RLEC with its own interstate tariff be directed to provide a copy of, or a link to, its July 1, 2024 interstate tariff to Staff no later than November 18, 2024. Staff also recommends the Commission adopt Staff's proposed Procedural Schedule to ensure adequate time for Staff to review the filings, submit a Report and Recommendation to the Commission, and the Commission to issue an order to allow Staff to reflect the relevant KUSF support adjustments in its annual KUSF assessment rate testimony filed in December 2024.

### **BACKGROUND**

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

Pursuant to K.S.A. 66-2005(c) and Commission Order,<sup>1</sup> all RLECs are required to reduce their

<sup>1</sup> Order Implementing Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, Docket No. 13-GIMT-004-GIT (Docket 13-004), Sept. 14, 2012 (Sept. 2012 Order).

intrastate switched access rates to interstate levels effective July 1<sup>st</sup> of each odd-numbered year. K.S.A. 66-2005(c)(1) provides that any reduction in an RLEC's intrastate access revenue resulting from the reduction to its intrastate access rate is recoverable from the KUSF, except for such revenue recovered from another support mechanism. The RLECs' recovery of their aggregate access revenue is limited to .75% (.0075) of the intrastate retail revenues used to set the KUSF assessment rate. If the amount of revenue recovery from the KUSF exceeds the revenue limit, the remaining revenue and rate adjustments are deferred until the next odd-numbered year. Staff does not anticipate this provision will apply as the limit, based on the current KUSF year's intrastate revenue base of \$306.1 million,<sup>2</sup> is \$2.3 million.

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. 22-GIMT-549-GIT.<sup>3</sup> 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); Twin Valley Telephone, Inc. (Twin Valley); and Wamego Telecommunications Company, Inc. (Wamego) maintain their own interstate access tariffs. The remaining RLECs concur in the National Exchange Carrier Association's (NECA) interstate access pools and tariff.

NECA's tariffed rates are based on pooling its RLEC members' costs and usage to determine the rates necessary to allow each member to recover its interstate access revenue requirement. The tariff contains Rate Bands, or varying rates, to allow members with higher costs to charge higher rates and members with lower costs to have lower rates. NECA's tariff includes numerous end-office switching Rate Bands, with terminating end office switching rates at bill-and-keep or zero (\$0.00). NECA's tariff includes two tandem switch service Rate Bands, separately for originating and for terminating service.<sup>4</sup> Interstate terminating and originating access rates are adjusted annually, with member RLECs authorized to increase intrastate rates to remain at parity with NECA's rates.<sup>5</sup>

For this Docket, an RLEC's intrastate access revenue and annual KUSF support adjustment will be based on the difference between its interstate and intrastate access rates that are not subject to the FCC's reforms, as of July 1, 2024, and the access minutes of use (MOU) for the twelve-month period ending June 30, 2024. Prior to 2000, the RLECs' intrastate switched access rates were reduced to parity with their interstate rates;<sup>6</sup> however, in 2000 the RLECs' usage declined and their interstate access rates increased to ensure recovery of their interstate access revenue requirements. The Commission determined K.S.A. 66-2005 focuses on rate parity and an RLEC must adjust its intrastate rates to maintain parity, whether a rate increase or decrease.<sup>7</sup>

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<sup>2</sup> Order Adopting KUSF Assessment Rate, Feb. 21, 2023; Direct Testimony of Steve Garrett, p. 23, Exhibit STG-1, p. 2, Jan. 5, 2024; Docket No. 24-GIMT-229-GIT.

<sup>3</sup> Order Adopting Revised Intrastate Access Rates, Revenues, and KUSF Adjustments; Docket No. 22-GIMT-549-GIT, Oct. 11, 2022.

<sup>4</sup> Tandem switch services include tandem switched facility, termination, and switching.

<sup>5</sup> Order, *In the Matter of Connect America Fund, WC Docket 10-90*, rel. March 27, 2013 (March 2013 Order).

<sup>6</sup> Order, Docket No. 94-GIMT-478-GIT, Dec. 27, 1996.

<sup>7</sup> Order, Docket No. 01-GIMT-081-GIT, Jan. 4, 2001.

For intrastate access tariff purposes, all of the RLECs except Columbus and LaHarpe concur in Blue Valley's tariff. Blue Valley's intrastate switched access tariff essentially mirrors the NECA interstate switched tariff. Moundridge, Pioneer, Rural, Totah, Twin Valley, and Wamego concur with some of Blue Valley's tariff rates, but not all of the rates. For the rates with which they do not concur, separate company-specific rates are identified within Blue Valley's tariff.

To determine the change in an RLEC's intrastate access revenue, the difference between the company's interstate and intrastate access rates is determined and multiplied by the MOU. Consistent with K.S.A. 66-2005(c)(1), an RLEC's annual KUSF support is adjusted by an amount equal to the RLEC's access revenue increase or decrease.<sup>8</sup>

## 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 bill-and-keep.<sup>9</sup> The FCC capped all interstate originating and terminating switched access and reciprocal compensation rates and intrastate terminating access rates, but not originating rates, for rate-of-return carriers. The FCC established the Access Recovery Charge (ARC) and Connect America Fund (CAF) for revenue recovery purposes. All of the Kansas RLECs operate under rate-of-return regulation.

The FCC has determined NECA's access rates must be adjusted, upward or downward, to reflect an RLEC entering or exiting the access pool.<sup>10</sup> This means an RLEC concurring in NECA's tariff adjusts its intrastate rates to parity, but non-NECA participants cannot increase intrastate terminating access rates when the rate is lower than the corresponding interstate rate.<sup>11</sup>

Staff has not discovered any additional requirements set forth by the FCC requiring action in this docket. However, Staff will continue to monitor FCC reforms that may have implications in future dockets.

## III. Impact of FCC Reforms on Kansas Biennial Requirement

K.S.A. 66-2005(c) requires an RLEC to adjust its intrastate switched access rates to parity with its interstate rates on March 1<sup>st</sup> of odd-numbered years, however, the FCC requires RLECs to adjust specified rates as of July 1 each year, including rates impacted by the FCC's rate reforms. The Commission, therefore, determined an RLEC is to adjust its intrastate access rates to parity on July 1<sup>st</sup>, concurrent with the FCC's effective date,<sup>12</sup> with an RLEC adjusting its intrastate rates subject to FCC reforms annually and intrastate rates not subject to the FCC reforms are to be

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<sup>8</sup> Staff notes the RLECs' total KUSF support is limited to \$30 million by K.S.A. 66-2008(e)(3) and, therefore, an RLEC may not recover, on a dollar-for-dollar basis, its total access revenue adjustment.

<sup>9</sup> 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, (Nov. 2011 Order).

<sup>10</sup> March 2013 Order.

<sup>11</sup> Sept. 2012 Order. See also 47 C.F.R. §51.909 and Order, CC Docket No. 01-92, rel. March 31, 2014, ¶7-9.

<sup>12</sup> Id. See also Order Opening Docket; Requiring RLEC Data Filings; Procedural Schedule; Discovery Order; Protective Order; General Service Matters, Docket 15-GIMT-068-GIT, Aug. 26, 2014.

adjusted to parity in odd-numbered years.<sup>13</sup>

Pursuant to FCC directives, NECA's access tariff rates must be increased or reduced to reflect when an RLEC enters or exits the access pool.<sup>14</sup> As a result, an RLEC concurring in NECA's tariff adjusts its intrastate rates to parity accordingly, however, an RLEC that does not participate in NECA's access pool cannot increase intrastate access rates if the intrastate rate is lower than the corresponding interstate rate.<sup>15</sup> In addition, when an RLEC exits NECA's access pool and tariff, NECA calculates the RLEC's new, company-specific rates, which the company incorporates in its company-specific tariff.

K.S.A. 66-2005(c)(1) authorizes an RLEC to recover its intrastate access revenue changes from the KUSF "except such revenue recovered from another support mechanism . . . ." The Commission determined an RLEC must reduce its calculated intrastate access revenue reduction by the Access Recovery Charge (ARC) and Connect America Fund (CAF) support it receives for intrastate revenue recovery.<sup>16</sup>

### ANALYSIS

Each RLEC's intrastate access rate adjustments and the corresponding KUSF support adjustment will be determined through this Docket; therefore, each RLEC will need to complete and file Attachment 1 in this Docket. An RLEC participating in NECA's tariff will report any intrastate non-8YY end office and tandem rate adjustments to maintain parity with NECA's rates. An RLEC that does not participate in NECA's tariff should only reflect intrastate adjustments if its rates will be reduced to maintain parity.<sup>17</sup>

Staff needs to review each RLEC's reported data and contact a company if Staff has any questions about the reported data. Staff needs to calculate each RLEC's rate adjustments, the aggregate revenue impact for all of the RLECs and the corresponding KUSF support adjustments, and file Report and Recommendation in the Docket. The Commission-approved access rate, revenue, and KUSF support adjustments determined in this Docket will be included in Staff's annual KUSF assessment rate calculations to be filed in December 2024, and effective July 1, 2025. Staff, therefore, proposed the following Procedural Schedule:

<u>Date</u>	<u>Action</u>
November 18, 2024	RLECs file Attachment 1 and interstate tariff in Docket, submit Excel copy to Staff.

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<sup>13</sup> Id. *See also* Docket 13-004, Order Adopting Commission Staff's Calculations and Recommendations Regarding Intrastate Switched Access Adjustments for Rural Local Exchange Carriers, Nov. 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.

<sup>14</sup> March 2013 Order.

<sup>15</sup> Sept. 2012 Order. *See also* 47 C.F.R. §51.909 and Order, CC Docket No. 01-92, rel. March 31, 2014, ¶7-9.

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

<sup>17</sup> Sept. 2012 Order.

December 16, 2024	Staff Report & Recommendation and calculations filed.
December 30, 2024	Parties' Responses to Staff R&R, calculation
January 9, 2025	Commission Order

### **RECOMMENDATION**

Staff recommends the Commission open a docket 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. Staff recommends the Commission place Attachment 1 on its website at: <https://kcc.ks.gov/telecommunications/service-provider-forms> so it may be downloaded by an RLEC. Each RLEC should be directed to file its completed Attachment 1 in the Docket and provide an Excel copy of its completed Attachment 1 to Staff at [steve.garrett@ks.gov](mailto:steve.garrett@ks.gov) and [hemant.bhagat@ks.gov](mailto:hemant.bhagat@ks.gov) no later than November 18, 2024. Staff also recommends any RLEC, with its own interstate tariff, be directed to provide a copy of or, a link to its July 1, 2024 interstate tariff to Staff concurrent with filing Attachment 1 in the Docket. Staff also recommends the Commission adopt Staff's proposed Procedural Schedule.

## CERTIFICATE OF SERVICE

25-GIMT-164-GIT

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 10/10/2024.

PHOENIX Z. ANSHUTZ, ATTORNEY  
PENNER LOWE LAW GROUP, LLC  
245 N WACO STREET, STE 125  
WICHITA, KS 67202  
panshutz@pennerlowe.com

RICHARD BALDWIN, PRESIDENT  
HOME TELEPHONE COMPANY, INC.  
211 S MAIN ST  
BOX 8  
GALVA, KS 67443  
rbaldwin@hci-ks.com

LANCE CASEY, REGULATORY COMPLIANCE  
CONSOLIDATED COMMUNICATIONS OF KANSAS  
COMPANY  
2116 S. 17TH STREET  
MATTOON, IL 61938  
lance.casey@consolidated.com

BRENT CUNNINGHAM, VICE PRESIDENT & GENERAL  
MANAGER  
CUNNINGHAM TELEPHONE COMPANY, INC.  
220 W MAIN  
PO BOX 108  
GLEN ELDER, KS 67446  
brent@ctctelephony.tv

CRAIG FREEMAN, GENERAL MANAGER  
WILSON TELEPHONE COMPANY, INC.  
2504 AVE D  
PO BOX 190  
WILSON, KS 67490-0190  
craig@wilsoncommunications.co

MARK M. GAILEY, PRESIDENT & GENERAL MANAGER  
TOTAH COMMUNICATIONS, INC.  
101 OCHELATA ST  
PO BOX 300  
OCHELATA, OK 74051-0300  
mark@totahcomm.com

RHONDA S GODDARD, CFO\*  
RURAL TELEPHONE SERVICE COMPANY, INC.  
D/B/A Nex-Tech  
145 N MAIN  
PO BOX 158  
LENORA, KS 67645  
rgoddard@nex-tech.com

FLOYD J JASINSKI, DIRECTOR - LEGISLATIVE &  
REGULATORY  
CONSOLIDATED COMMUNICATIONS OF MISSOURI  
COMPANY  
114 VERNON STREET  
ROSEVILLE, CA 95678  
floyd.jasinski@consolidated.com

BRANDON KOCH, PRESIDENT & GM  
H&B COMMUNICATIONS, INC.  
108 N MAIN  
PO BOX 108  
HOLYROOD, KS 67450  
brkoch@hbcomm.net

JILL KUEHNY, CEO/GENERAL AMANGER  
KANOKLA TELEPHONE ASSN., INC.  
100 KANOKLA AVE  
PO BOX 111  
CALDWELL, KS 67022  
jkuehny@kanoklanetworks.com

## CERTIFICATE OF SERVICE

25-GIMT-164-GIT

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
ahsan.latif@ks.gov

JENNIFER LEACH, GM/CEO  
PEOPLES TELECOMMUNICATIONS, LLC  
208 N BROADWAY  
PO BOX 450  
LA CYGNE, KS 66040  
jennifer@peoplestelecom.net

HARRY J. LEE, JR., PRESIDENT/GENERAL MANAGER  
LAHARPE TELEPHONE COMPANY, INC.  
D/B/A LAHARPE LONG DISTANCE  
109 W 6TH ST  
PO BOX 100  
LA HARPE, KS 66751  
harry.lee@laharpetel.com

SCOTT LEITZEL, PRESIDENT  
TWIN VALLEY TELEPHONE, INC.  
22 SPRUCE  
PO BOX 395  
MILTONVALE, KS 67466  
scott.leitzel@tvttinc.net

CARRIE LOOS, ACCOUNTING ADMINISTRATOR  
WHEAT STATE TELEPHONE COMPANY, INC.  
D/B/A WHEAT STATE TECHNOLOGIES, WST  
PO BOX 320  
UDALL, KS 67146  
cloos@wheatstate.com

WILLIAM R. MCVEY, COO  
SOUTHERN KANSAS TELEPHONE COMPANY, INC.  
112 S LEE ST  
PO BOX 800  
CLEARWATER, KS 67026-0800  
bill.mcvey@sktcompanies.com

CATHERINE MOYER, GENERAL MANAGER & CEO  
PIONEER TELEPHONE ASSN., INC.  
D/B/A PIONEER COMMUNICATIONS  
120 W KANSAS AVE  
PO BOX 707  
ULYSSES, KS 67880-0707  
catherine.moyer@pioncomm.net

MICHAEL J. MURPHY, PRESIDENT & MANAGER  
GORHAM TELEPHONE COMPANY  
100 MARKET  
PO BOX 235  
GORHAM, KS 67640  
mmurphy@gorhamtel.com

ZACK O'DELL, CEO  
S&T COMMUNICATIONS LLC  
320 KANSAS  
PO BOX 99  
BREWSTER, KS 67732  
zack.odell@sttelcom.com

JENNIFER PACHNER, ASSESSMENT  
UNITED TELEPHONE ASSN., INC.  
1107 MCARTOR RD  
PO BOX 117  
DODGE CITY, KS 67801  
jenniferp@unitedtelcom.net

JASON PETTIT, CONTROLLER  
TRI-COUNTY TELEPHONE ASSOCIATION, INC.  
1568 S 1000 RD  
PO BOX 299  
COUNCIL GROVE, KS 66846  
jpettit@tctkansas.net

KATHY PRICE, GENERAL MANAGER\*  
ZENDA TELEPHONE COMPANY, INC.  
208 N. MAIN ST  
ZENDA, KS 67159  
kprice@zendatelephone.com

## CERTIFICATE OF SERVICE

25-GIMT-164-GIT

SHANA RAINS  
MADISON TELEPHONE LLC  
117 N THIRD  
PO BOX 337  
MADISON, KS 66860-0337  
mtn.shana@gmail.com

BEAU REBEL, GENERAL MANAGER  
GOLDEN BELT TELEPHONE ASSOCIATION.  
103 LINCOLN ST  
RUSH CENTER, KS 67575-3000  
brebel@gbtlive.com

CHRIS RENO, VICE PRESIDENT - CONTROLLER  
S&A TELEPHONE COMPANY, INC.  
D/B/A Highline Kansas  
413 MAIN ST  
PO BOX 68  
ALLEN, KS 66833  
chris.reno@highlinefast.com

KATHY RUOFF  
RAINBOW TELECOMMUNICATIONS ASSOCIATION, INC.  
608 MAIN ST  
PO BOX 147  
EVEREST, KS 66424-0147  
kathy@rainbowtel.com

BECKY SCOTT  
ELKHART TELEPHONE COMPANY, INC.  
610 S COSMOS  
PO BOX 817  
ELKHART, KS 67950  
bscott@epictouch.com

CARLA SHEARER, CEO/GENERAL MANAGER  
SOUTH CENTRAL TELEPHONE ASSN. INC.  
215 S ILIFF  
PO BOX B  
MEDICINE LODGE, KS 67104  
cshearer@sctelcom.com

DAVE SOPER, GENERAL MANAGER  
COLUMBUS COMMUNICATIONS SERVICES, LLC  
224 SOUTH KANSAS AVENUE  
COLUMBUS, KS 66725  
dsoper@columbus-telephone.com

TAMMY SOUZA, VP OF FINANCE  
MOKAN DIAL, INC.  
112 S. BROADWAY  
PO BOX 429  
LOUISBURG, KS 66053-0429  
tsouza@townes.net

JOHN TIETJENS, PRESIDENT AND GENERAL MANAGER  
MUTUAL TELEPHONE COMPANY  
365 MAIN ST  
PO BOX 338  
LITTLE RIVER, KS 67457  
jtietjens@mtc4me.com

JIMMY TODD, CEO  
MOUNDRIDGE TELEPHONE COMPANY  
145 N MAIN  
LENORA, KS 67645  
jtodd@nex-tech.com

MARK WADE, VP OF OPERATIONS  
HAVILAND TELEPHONE COMPANY, INC.  
104 N MAIN  
PO BOX 308  
HAVILAND, KS 67059  
mark@havilandtelco.com

MARK WADE, VP OF OPERATIONS  
J.B.N. TELEPHONE COMPANY, INC.  
PO BOX 111  
HOLTON, KS 66436  
mark@havilandtelco.com

## CERTIFICATE OF SERVICE

25-GIMT-164-GIT

JEFF WICK, PRESIDENT/GENERAL MANAGER  
WAMEGO TELECOMMUNICATIONS COMPANY, INC.  
1009 LINCOLN  
PO BOX 25  
WAMEGO, KS 66547-0025  
jwick@wtcks.com

CRAIG WILBERT, GENERAL MANAGER  
CRAW-KAN TELEPHONE COOPERATIVE, INC.  
200 N OZARK  
PO BOX 100  
GIRARD, KS 66743  
crwilbert@ckt.net

CANDACE WRIGHT, CEO/GM  
BLUE VALLEY TELE-COMMUNICATIONS, INC.  
1559 PONY EXPRESS HWY  
HOME, KS 66438  
cwright@bluevalleyinc.net

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