

March 10, 2025

Ms. Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Re: Docket No. 25-CPBC-105-KSF

In the Matter of the Audit of Combined Public Communications, LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 27, Fiscal Year March 2023-February 2024

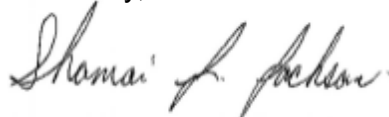
Dear Ms. Retz:

In its August 6, 2024 Order, the Kansas Corporation Commission (KCC) directed Vantage Point Solutions (VPS) to perform a KUSF carrier audit of Combined Public Communications, LLC (CPC or Company) to ensure that the data submitted to the KUSF via the KUSF CRWs, the assessments paid, and the calculation and application of the flow-through surcharge billed to and collected from CPC's customers, if applicable, are appropriate and accurate.

The KCC directed VPS to file two (2) versions of the audit report with the KCC; one (1) version containing confidential information and one (1) version with the confidential data redacted for public disclosure. CPC's audit does not require a separate confidential report; therefore, only the enclosed public audit report for CPC is being filed.

Copies of the supporting documentation, including VPS' audit work papers and information provided by the company, are not included with the audit report, but are available from VPS, upon request.

Sincerely,



Shomari Jackson

cc: Steve Garrett - steve.garrett@ks.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of March, 2025, the above Kansas Universal Service Fund Audit Report was e-filed with the Kansas Corporation Commission and a copy was sent via electronic mail and/or U.S. Mail to:

KANSAS CORPORATION COMMISSION
1500 S.W. ARROWHEAD ROAD
TOPEKA, KS 66604

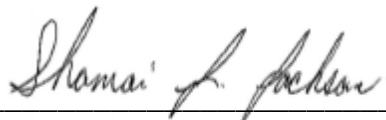
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Shomari Jackson



**Vantage Point Solutions, Inc.
Audit Report for
Combined Public Communications, LLC**

From: Shomari Jackson, Auditor
Company Personnel: Vicky Moody, Regulatory Officer
Date: March 7, 2025
On-Site Visit Date: January 14-15, 2025
KUSF Status: Current with Reporting & Payment obligations
Re: Docket No. 25-CPBC-105-KSF

In the Matter of the Audit of Combined Public Communications, LLC by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 27, Fiscal Year March 2023-February 2024

Audit Summary

Pursuant to the Kansas Corporation Commission's (KCC or Commission) August 6, 2024 Order, Vantage Point Solutions, Inc. (VPS) conducted an audit of Combined Public Communications, LLC (CPC or Company) based on the Kansas Universal Service Fund (KUSF) Audit Procedures adopted for KUSF Fiscal Year 27 (FY27).¹ VPS identified two (2) findings resulting from the Company's non-compliance with the Commission's KUSF policies, with no financial impact to the KUSF. The Company is current with its KUSF obligations.

- **Finding No. 1** – The Company used the Fiscal Year 26 rate instead of the Fiscal Year 27 rate when collecting the KUSF surcharge from its customers for the period of March 2023. However, the result was immaterial.
- **Finding No. 2** – The Company did not correctly fill out Box C of the Quarterly True-up for the second quarter of Fiscal Year 27 (June 2023 – August 2023), with no financial impact to the KUSF. The Company self-corrected this finding during the course of the audit.

VPS recommends the Commission issue an Order to adopt this Audit Report and the identified findings and direct CPC to:

1. File an affidavit attesting that the company has corrected its billing system to use the correct assessment rate for the appropriate fiscal year.

¹ Order Accepting VPS' KUSF Proposed Revisions to Selection Criteria and Carrier Review Procedures, Docket No. 23-GIMT-261-GIT, Jul.. 2, 2024 (23-261 Order).

The affidavit should provide the date the corrective action was implemented.

VPS recommends CPC be directed to take all corrective actions within 30-days from the date of the Commission's Order. VPS will file a Compliance Report in the Docket within 60-days of the Order.

The Company is current with its KUSF obligations.

CPC agrees with the Audit Report.

Background

During the course of the audit, VPS issued 17 Data Requests (DRs) to CPC. DR No. 16 is included as Attachment A.

CPC operates as a provider of interexchange and operator services² and is headquartered in Cold Spring, KY.

CPC is required to report its revenue and pay the related assessments to the KUSF on a monthly basis.³ The Company is authorized to collect an amount equal to or less than its KUSF assessment from customers, and does so.⁴ The Company is not a designated Eligible Telecommunications Carrier (ETC) in Kansas, therefore, it does not offer Lifeline services to its customers.

Pursuant to Commission's Order,⁵ VPS confirmed that CPC does not offer assessable and non-assessable services in a bundle. The Company collects the KUSF surcharge and reports revenues based on the actual operator service intrastate calls. The Company states it uses this same allocation methodology for Federal USF (FUSF) and KUSF purposes.⁶

Current KUSF Obligations

The Company is current with its KUSF obligations.⁷

Current Audit Findings

VPS conducted the audit of CPC in accordance with the KUSF Audit Procedures adopted by the KCC.⁸ Based on the referenced procedures, VPS identified the following audit findings and provides the following recommendations:

² Order Approving Certificate of Convenience Application, Docket No. 17-CPBC-470-COC, Aug. 22, 2017 (17-470 Order).

³ Order Setting the Kansas Universal Service Fund Assessment Rate for Year Ten and Establishing Reporting Requirements, Docket No. 06-GIMT-332-GIT, Jan. 23, 2006 (06-332 Order).

⁴ K.S.A. 66-2008(a).

⁵ Order Determining KUSF Contribution Methodology, ¶ 27, Docket No. 14-GIMT-105-GIT, Oct. 20, 2016.

⁶ Attachment A.

⁷ Confirmed with the KUSF Administrator on Mar. 7, 2025.

⁸ 23-261 Order.

Audit Finding No. 1

Standard: The KUSF Year 27 (March 2023 – February 2024) assessment rate shall be 11.37%.⁹

Finding 1: CPC utilized the KUSF rate for the preceding year, FY 26, instead of the rate for FY 27 when collecting the KUSF surcharge from its customers for March 2023¹⁰. However, the amount was immaterial.

Recommendation: VPS recommends the Company be directed to file an affidavit, signed by an officer of the Company, attesting that the company has corrected its billing system to use the correct assessment rate for the appropriate fiscal year.

VPS recommends CPC be directed to take all corrective actions within 30-days from the date of the Commission's Order. VPS will file a Compliance Report in the Docket within 60-days of the Order.

Audit Finding No. 2

Standard: A Company is to report the amount of its actual KUSF assessments collected from customer in Box C of the CRW.¹¹

Finding: CPC did not correctly fill out Box C in its Quarterly True-up for the second quarter of Fiscal Year 27 (June 2023 – August 2023), with no financial impact to the KUSF.¹² The Company self-corrected this finding during the course of the audit.

Recommendation: VPS recommends the Commission consider this finding resolved.

⁹ Order Adopting KUSF Year 27 Assessment Rate and Affordable Rates, Docket No. 23-GIMT-261-GIT, Jan 17, 2023.

¹⁰ Attachment A

¹¹ Order Adopting Audit Report, Docket No. 19-RWLZ-033-KSF, Jan. 24, 2019. See also KUSF Carrier Remittance Instructions, Plan Year 2023-2024; (CRW Instructions), II.A.

https://www.vantagepnt.com/wpcontent/uploads/2022/02/kusf_instructions_fy26_final.pdf.

¹² Attachment A

KUSF Carrier Audit Information Request

Submitted By: Shomari Jackson
Submitted To: Vicky Moody
Company Name: Combined Public Communications
Docket Number: 25-CPBC-105-KSF
Request Date: February 7, 2025
Due Date: **February 18, 2025**

Data Request No. 16 - REVISED**RE: Confirmation of Auditor Understanding**

Please confirm that the auditor's understanding of the following items is correct. If the statements are incorrect, please provide clarification.

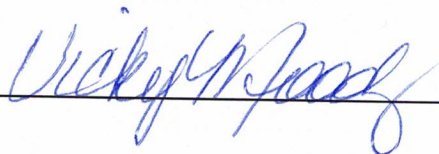
- The Company used the FY 26 KUSF rate (11.44%) instead of the FY 27 rate (11.37%) when collecting the KUSF surcharge from its customers for the period of March 2023. **Correct**
- The Company did not correctly fill out Box C of the Quarterly True-up for FY 27 (June 2023 – August 2023) **Correct. CPC has filed a revised true-up for FY- 27**
- The Company's KUSF contribution methodology is consistent with its Federal USF contribution methodology. **Correct**

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 – DR16

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 VPS' auditor any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Data Request.

Sign: _____



Date: _____

