

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 S&T Communications LLC., 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, Attachments 3a and 4 have 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: Zack Odell

Encl.

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 S&T Communications LLC. 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 S&T Communications LLC to the statements made in this certification.


2. S&T Communications LLC was named as an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 10-S&CT-564-ETC by order dated October 13, 2010 and KUSF support purposes in Docket No. 10-S&CT-564-ETC by order dated October 13, 2010.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by S&T Communications LLC 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

Zack Odell
Printed/Typed Name

Executed on 6.27.2018 date.

Email address: zack.odell@sttelcom.com

Company Name : S&T COMMUNICATIONS LLC

All CETCs must complete this form to receive certification for its use of FUSF and KUSF support, pursuant to 47 C.F.R. § 54.314, Kansas statutes, and KCC Requirements. Please attach additional pages if necessary. If you have any questions, please email the KCC Staff at c.arnes@kcc.ks.gov.

Data
Year **2017**

	AMOUNT FOR KANSAS A	ALLOCATION PERCENT B	FUSF CODE (see Notes) C	AMOUNT FOR FUSF AREAS (Excluding SWBT Area) D=AxB	ALLOCATION PERCENT E	KUSF CODE (see Notes) F	AMOUNT FOR KUSF AREAS (Including SWBT Area) G = AxE
FUSF WORKING LOOPS/LINES							
KUSF SUPPORTED LINES							
<u>NEW INVESTMENTS:</u>							
1. SWITCHING				-			-
2. OUTSIDE PLANT (LOCAL LOOPS, CELL SITES)(1)				-			-
SUBTOTAL NEW INVESTMENTS				\$ -			\$ -
<u>EXPENSES:</u>							
3. SWITCH MAINTENANCE				-			-
4. OUTSIDE PLANT MAINTENANCE				-			-
5. NETWORK SUPPORT				-			-
6. ADMINISTRATIVE EXPENSE				-			-
SUBTOTAL EXPENSES				\$ -			\$ -
A. TOTAL CASH EXPENDITURES ASSD WITH USF				\$ -			\$ -
<u>B. CERTIFIED FUSF RECEIPTS FOR CETCS</u>							
B1. Frozen High Cost Support							
B2. Mobility Fund Support							
B3. Rural Broadband Experiments Fund							
B4. Total Certified Federal USF Receipts				\$ -			\$ -
C. KUSF RECEIPTS				\$ -			\$ -
D. TOTAL FUSF AND/OR KUSF				\$ -			\$ -
E. DO EXPENDITURES EXCEED FUSF RECEIPTS? No (negative number means FUSF exceeds Expenditures)				\$ -			\$ -
F. DO EXPENDITURES EXCEED FUSF and/or KUSF RECEIPTS? No (negative number means KUSF exceeds Expenditures)				\$ -		No	\$ -

Notes:

- Exclude the cost of transport between switches (dial-tone and/or tandem).
- Allocation Codes (describe how the costs are allocated): *[the following are examples only, not a complete list.]*
 - Based on number of switched MOUs from USF supported cell sites.
 - Based on actual expenditures at USF cell sites. An allocation of USF area to total served area is applied at each cell site. (i.e. 200,000 investment at Cell Site A, which serves 80% USF supported area, results in 160,000 of USF dollars.)
 - Based on percent of USF served areas to all areas.

Contact Name: ZACK ODELL

Title: CEO

Phone No.: 785-694-2256

E-Mail: zack.odell@sttelcom.com

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Attachment 4

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

Supplemental
PagesPage 2

REDACTED

**18-GIMT-394-GIT
Attachment 4**

Subtotal		0		0
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Annual 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(e).

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
4/29/17	Blizzard-generators went down and battery backups lost functionality	INTERNET/PHONE	Oakley	Monthly Maintenance & testing of equipment were implemented	1095

(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.

NONE

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

3

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 S&T Communications LLC. 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 S&T Communications LLC to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications LLC 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 6.27.2018 (date).


Signature

Zack Odell

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

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

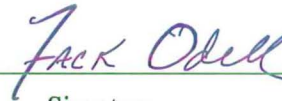
KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is CEO of the S&T Communications LLC. 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 S&T Communications LLC to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications LLC 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 6.27.2018 (date).



Signature

Zack Odell

Printed / Typed Name

6. 47 U.S.C. § 214(e)(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
S&T WEBSITE	INTERNET	WORLDWIDE	24/7/365
S&T ANNUAL PHONE DIRECTORY	PRINT	Brewster, Colby, Dighton, Goodland, Grinnell, Kanorado, Levant, Menlo, Russell Springs, Winona, Atwood, Bird City, Gove, Grainfield, Hoxie, Leoti, McDonald, Oakley, Sequin, Sharon Springs, Tribune, Wallace, & Weskan – customers and non-customers receive the directory in the mail as long as they have a mailing address with the post office	NOVEMBER

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Attachment 6

KGCR-FM	RADIO	NORTHWEST KANSAS	VARIES
KRDQ	RADIO	NORTHWEST KANSAS	VARIES
KWGB-FM	RADIO	NORTHWEST KANSAS	VARIES
KXXX/KQLS	RADIO	NORTHWEST KANSAS	VARIES
KLOE AM	RADIO	NORTHWEST KANSAS	VARIES
S&T Media	CATV	SERVICE AREAS	VARIES
Various	NEWSPAPERS	NORTHWEST KANSAS	VARIES
OPEN SPACES	RADIO	NORTHWEST KANSAS	MONTHLY

(If necessary, please attach additional pages.)

7. A competitive ETC must certify that it offers a local usage plan comparable to that of the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.

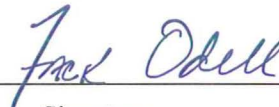
Residential PKG LD Unlimited, Business PKG LD 1000, Business PKG LD 1500,
Business PKG LD 3000, Business PKG LD 5000, Business PKG LD 7500

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION
KCC Docket Reference: 06-GIMT-446-GIT
(Please type or print legibly)

1. My title is CEO of the S&T Communications LLC. In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding S&T Communications LLC to the statements made in this certification.

2. By this affidavit, I certify that S&T Communications LLC offers a local usage plan comparable to that of the incumbent.

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 6.27.2018 (date).



Signature

Zack Odell

Printed/Typed Name