

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

In the Matter of the Audit of GC Pivotal, LLC)
By the Kansas Universal Service Fund (KUSF))
Administrator Pursuant to K.S.A. 66-2010(b)) Docket No. 24-GCPT-115-KSF
For KUSF Operating Year 25, Fiscal Year)
March 2022-February 2023.)

MOTION FOR EXTENSION OF TIME

COMES NOW GC Pivotal, LLC (“GC Pivotal”) and files its Motion for Extension of Time required for GC Pivotal to take the corrective actions recommended by Vantage Point Solutions (“VPS”) in the Order Adopting Audit Report filed in Docket No. 24-GCPT-115-KSF. In support of this motion, GC Pivotal states as follows:

1. On July 2, 2024, the Kansas Corporation Commission (“Commission”) filed its Order Adopting Audit Report requiring GC Pivotal to take five (5) corrective actions recommended by VPS within sixty (60) days of issuance, which would be September 2, 2024.

2. The Order Adopting Audit Report requires GC Pivotal to: (1) file audit True-ups for fiscal years 2025-2027 and revised CRWs for March and April 2024 to include assessable revenues and exclude non-assessable revenues; (2) update its billing system to include Kansas Universal Service Fund (“KUSF”) surcharge collection of certain services and exclude other services; (3) update its KUSF reporting procedures to include certain services and exclude other services; (4) remit \$6,812.65 to the KUSF; and (5) file an affidavit signed by an officer of GC Pivotal attesting that GC Pivotal corrected its KUSF reporting procedures and billing system as required and remitted \$6,812.65 to the KUSF.

3. On August 30, 2024, GC Pivotal remitted \$6,812.65 to the KUSF.

4. On August 30, 2024, GC Pivotal filed a motion (the “Motion”) requesting a 60-day extension to comply with recommendations 1-3 and 5 of the Order Adopting Audit Report making such filing due November 2, 2024.

5. On September 19, 2024, the Commission granted the Motion.

6. On November 19, 2024, GC Pivotal filed another motion (the “Second Motion”) requesting a 75-day extension to comply with recommendations 1-3 and 5 of the Order Adopting Audit Reporting, making such filing due January 16, 2025.

7. On November 26, 2024 the Commission granted the Second Motion.

8. On January 1, 2025, following months of systems updates and testing, GC Pivotal updated its billing system to correct its customer taxing and KUSF reporting procedures. During testing, GC Pivotal subsequently determined that aspects of its customer invoicing and taxing for certain voice features and products had not been fully remediated. Thus, despite continuing to work diligently, GC Pivotal still cannot complete the corrective actions and file the required affidavit from a GC Pivotal officer by January 16, 2025.

9. In order to provide GC Pivotal with time to comply with the recommendations by VPS, GC Pivotal is requesting an additional 120-day extension to comply with recommendations 1-3 and 5 of the Order Adopting Audit Report, making such filing due May 16, 2025.

WHEREFORE, GC Pivotal respectfully requests the Commission grant its request for a further extension of time.

Respectfully submitted,

/s/ Lucy Malcolm

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February 24, 2025

CERTIFICATE OF SERVICE

I, Leetal Weiss, certify that a true copy of the attached Motion for Extension of Time has been served to the following by means of electronic service on February 24, 2025.

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CERTIFICATE OF SERVICE

24-GCPT-115-KSF

/s/ Leetal Weiss
Leetal Weiss