

LAW OFFICES  
JAMES M. CAPLINGER, CHARTERED  
823 S.W. 10<sup>TH</sup> AVE.  
TOPEKA, KS 66612-1618

JAMES M. CAPLINGER (1929 – 2015)  
JAMES M. CAPLINGER, JR.  
COLLEEN R. JAMISON

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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 Pioneer Telephone Association, Inc., 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, Attachment 2a, lines 240, 245, and 255 as well as the entirety of Attachment 4 has 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: Catherine Moyer

Encl.

**Attachment 1**

**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 & General Manager of  
Pioneer Telephone Association, Inc. (Company/ Cooperative). 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 Pioneer Telephone Association, Inc. (Company/Cooperative) to the statements  
made in this certification.

2. Pioneer Telephone Association, Inc. (Company/Cooperative) was named as  
an eligible telecommunications carrier by the Kansas Corporation Commission (KCC) for federal support  
purposes in Docket No. 98-GIMT-241-GIT by order dated December 5, 1997  
and KUSF support purposes in Docket No. 98-GIMT-241-GIT by order dated  
December 5, 1997.

3. By this affidavit, I certify that the USF, CAF and/or KUSF received by  
Pioneer Telephone Association, Inc. (Company/Cooperative) 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

Pioneer Telephone Association, Inc.

**Attachment 1**

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.

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

Catherine Moyer, CEO & General Manager  
Printed/Typed Name

Executed on June 28, 2018 date.

Email address: catherine.moyer@pioncomm.net

Study Area: THE PIONEER TELEPHONE ASSOCIATION, INC.

Docket No. 15-GIMT-389-GIT  
For the Following Lines, use Data From the  
Previous Year's "- 1" Filing

DATA YEAR: 2017

	LINE	REGULATED AMOUNT
WORKING LOOPS		
1. Total Loops	(060)	7,844
2. Category 1.3 Loops	(070)	7,791
INVESTMENT		
1. Plant Accounts		
a. Acct 2001	(160) \$	138,911,814
2. Selected Plant Accounts		
a. Acct 2210	(230)	7,742,949
b. Acct 2220	(235)	0
c. Acct 2230	(240)	
d. Total Central Office Equip	(245)	
e. Circuit Equip Cat 4.13	(250)	15,911,366
f. Acct 2410	(255)	
AMORTIZABLE TANGIBLE ASSETS		
Acct. 2680 Tot Assets	(800)	0
Acct. 2680 (2230) COE Trans	(805)	0
Acct. 2680 (Cat. 4.13) COE Trans	(810)	0
Acct. 2680 (2410) Total CWF	(815)	0
Acct. 2680 (2410) CWF-Cat 1	(820)	0
Acct. 6560 (2680) Dep & Amort	(830)	0
PART 36 - COST STUDY DATA		
1. Cost Study Avg C&WF Acct 2410	(700)	77,000,171
2. Cost Study Avg C&WF Cat 1	(710)	62,241,590
3. C&WF CAT 1 Factor		0.808331
4. COE CAT 4.13 Factor		0.424255
5. Switching Factor		1.000000

Study Area: <u>THE PIONEER TELEPHONE ASSOCIATION, INC.</u>		
Docket No. 15-GIMT-389-GIT		
For the Following Lines, use Data From the		
Previous Year's "- 1" Filing	DATA YEAR:	2017
For the Following Lines, Use Gross Additions for Plant and Annual		
Amounts for Expenses for the Test Year		
INVESTMENT, EXPENSE AND TAXES	LINE	REGULATED AMOUNT
1. Selected Plant Accounts		
a. Acct 2230	(240)	
b. Total Central Office Equip	(245)	
c. Acct 2410 (Total)	(255)	
2. Expenses - Plant Specific Exp		
a. Acct 6110	(335)	10,843
b. Acct 6110 (benefits)	(340)	0
c. Acct 6110 (rents)	(345)	0
d. Acct 6120	(350)	1,579,457
e. Acct 6120 (benefits)	(355)	643,097
f. Acct 6120 (rents)	(360)	0
g. Acct 6210	(365)	981,669
h. Acct 6210 (benefits)	(370)	308,174
i. Acct 6210 (rents)	(375)	0
j. Acct 6220	(380)	0
k. Acct 6220 (benefits)	(385)	0
l. Acct 6220 (rents)	(390)	0
m. Acct 6230	(395)	1,061,498
n. Acct 6230 (benefits)	(400)	449,878
o. Acct 6230 (rents)	(405)	0
p. (sum of lines 365+380+395)	(410)	2,043,167
q. Acct 6410	(430)	1,805,679
r. Acct 6410 (benefits)	(435)	925,977
s. Acct 6410 (rents)	(440)	0
t. Total 6110 - 6410	(445) \$	5,439,146
3. Expenses - Plant Non Specific Exp		
a. Acct 6530	(450)	1,485,806
b. Acct 6530 (benefits)	(455)	525,134
4. Depreciation & Amortization Exp		
a. Acct 6560(2210)	(510)	185,562
b. Acct 6560(2220)	(515)	0
c. Acct 6560(2230)	(520)	1,619,527
d. Acct 6560(2210-2230)	(525) \$	1,805,089
e. Acct 6560(2410)	(530)	1,228,047
5. Corporate Operating Expenses		
a. Acct 6710	(535)	273,702
b. Acct 6710 (benefits)	(540)	67,846
c. Acct 6720	(550)	1,082,032
d. Acct 6720 (benefits)	(555)	331,400
e. (sum of lines 535+550)	(565) \$	1,355,734
6. Other Expenses and Revenues		
a. Benefits Portion	(600)	3,823,428
b. Rents Portion	(610)	0
Sum of All Expenses (Excluding Depreciation)	\$	8,280,687
7. Taxes		
a. Acct 7200	(650)	418,504



Study Area: <u>THE PIONEER TELEPHONE ASSOCIATION, INC.</u>		
Docket No. 15-GIMT-389-GIT For the Following Lines, use Data From the Previous Year's "- 1" Filing		
	DATA YEAR:	2017
Test for use of FUSF & KUSF		
CAPITAL:		
1. Category 1 C&WF		2,786,532
2. Category 4.13 COE and Switching		1,311,012
MAINTENANCE:		
3. CWF - MAINT. EXP.		711,090
4. COE - MAINT. SW		673,495
5. COE - MAINT-OP SYSTEM		-
6. COE - MAINT. - TRANS.		326,991
7. CWF - NETWORK SUPPORT		4,966
8. COE - NETWORK SUPPORT		1,846
9. CWF GENERAL SUPPORT		428,872
10. COE GENERAL SUPPORT		159,446
20. CWF NETWORK OPERATION		440,008
21. COE NETWORK OPERATION		163,586
22. CWF EXEC. & PLANNING		94,287
23. COE EXEC. & PLANNING		35,054
24. CWF GENERAL ADMIN.		343,805
25. COE GENERAL ADMIN.		127,820
26. CWF OPERATING TAXES		191,684
27. COE OPERATING TAXES		71,264
28. CWF BENEFITS - TTL OPER EXP		1,751,209
29. COE BENEFITS - TTL OPER EXP		651,065
30. CWF RENTS - TTL OPER EXP		0
31. COE RENTS - TTL OPER EXP		0

Study Area: THE PIONEER TELEPHONE ASSOCIATION, INC.

Docket No. 15-GIMT-389-GIT  
For the Following Lines, use Data From the  
Previous Year's "- 1" Filing

DATA YEAR: **2017**

A. Total Cash Expenditures Assd with USF	10,274,032.49
<u>B. Certified Federal USF Receipts:</u>	
B1. High Cost Loop Support	880,287
B2. Safety Net Support	-
B3. Broadband Loop Support	2,969,754
B4. Safety Valve Support for acquired Exch.	-
B5. Connect America Cost Model	-
B6. Alternative Connect America Model	-
B7. CAF ICC (§§ 51.915, 51.917, 51.304)	976,518
B8. Total Certified Federal USF Receipts	\$ 4,826,559
C. KUSF Receipts	3,535,346
D. Total FUSF and KUSF Receipts	8,361,905
E. Do Expenditures Exceed FUSF Receipts?	Yes
Amount Expenditures Exceed Certified FUSF (negative number means FUSF exceeds Expenditures)	
5,447,473 [A - B5]	
F. Do Expenditures Exceed FUSF & KUSF Receipts?	Yes
Amount Expenditures Exceed Certified FUSF and/or KUSF (negative number means FUSF/KUSF exceeds Expenditures)	
1,912,127 [A - D]	

Please provide the following information:

Contact: Catherine Moyer

Position: General Manager

Phone No.: 1-620-356-3211

E-Mail: [catherine@pioncomm.net](mailto:catherine@pioncomm.net)

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

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

Data Year: 2017

Town or Exchange	Description of Improvement	Cash Investment	Allocation %	Notes	Amount Used in the USF Supported Areas
A	B	C	D	E	F = C x D



**REDACTED**

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

NOTES:

**This total amount should match the New Investment Subtotal on the USF Certification Form - Attachment 2a LINES (245 & 255).**

Contact: Catherine Moyer

Phone No.: 1-620-356-3211

Title: CEO & General Manager

E-Mail: Catherine.moyer@pioncomm.net

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
None					

(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.

Pioneer is not aware of any complaints received by the FCC or the KCC.

**18-GIMT-394-GIT**  
**Attachment 6**

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**

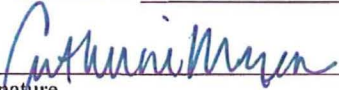
**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is CEO & General Manager of the Pioneer Telephone Association, Inc.  
(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 Pioneer Telephone Association, Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Pioneer Telephone Association, Inc. (Company/ Cooperative) 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 June 28, 2018 (date).

  
Signature

Catherine Moyer, CEO & General Manager

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**

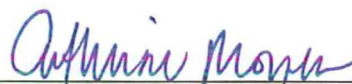
**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is CEO & General Manager of the Pioneer Telephone Association, Inc. (Company/ Cooperative). 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 Pioneer Telephone Association, Inc. (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Pioneer Telephone Association, Inc. (Company/ Cooperative) 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 June 28, 2018 (date).



Signature

Catherine Moyer, CEO & General Manager

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
See Attachment			

(If necessary, please attach additional pages.)



Listing of Advertising (2017)

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Pioneer Communications Telephone Directory - Service Guide and General Information Pages (2016-2017)	Telephone Directory General Information Pages	Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	10/01/16 - 09/30/17 Annually
Pioneer Communications Telephone Directory - Yellow Pages (2016-2017)	Telephone Directory Yellow Pages	Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	10/01/16 - 09/30/17 Annually
Pioneer Communications Telephone Directory - Service Guide and General Information Pages (2017-2018)	Telephone Directory General Information Pages	Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	10/01/17 - 09/30/18 Annually
Pioneer Communications Telephone Directory - Yellow Pages (2017-2018)	Telephone Directory Yellow Pages	Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	10/01/17 - 09/30/18 Annually
Altiplano Publishing Nuestro Directorio Spanish Telephone Directory (2017)	Telephone Directory Yellow Pages	Finney, Ford, Grant, Hamilton, Haskell, Kearny, Morton, Seward, Stanton, and Stevens Counties	11/01/16 - 10/31/17 Annually
Altiplano Publishing Nuestro Directorio Spanish Telephone Directory (2017)	Telephone Directory Yellow Pages	Finney, Ford, Grant, Hamilton, Haskell, Kearny, Morton, Seward, Stanton, and Stevens Counties	11/01/17 - 10/31/18 Annually
Pioneer Communications Cable TV Local Information Channel 9	Cable Television	Big Bow, Coolidge, Deerfield, Holcomb, Horace, Hugoton, Johnson City, Kendall, Lakin, Leoti, Manter, Moscow, Marienthal, Richfield, Rolla, Satanta, Scott City, Sublette, Syracuse, Tribune, Ulysses	01/01/17 - 12/31/17 Daily
KOOD-TV / KSWK-TV (PBS) Smoky Hills Public Television	Broadcast Television	Western half of Kansas	01/01/17 - 12/31/17 Four times weekly
KBSD-KWCH Gray Television	Broadcast Television	Western half of Kansas	01/01/17 - 12/31/17 Four times weekly
KUPK-KAKE Knoxville TV, LLC	Broadcast Television	Western half of Kansas	01/01/17 - 12/31/17 Four times weekly
KSNG - KSN Lin Television Co.	Broadcast Television	Western half of Kansas	01/01/17 - 12/31/17 Four times weekly
KANZ 91.1FM High Plains Public Radio	Radio	Western half of Kansas, Oklahoma and Texas panhandles	02/02/17 - 02/01/18 once a month
KJIL Great Plains Christian Radio, Inc.	Radio	Finney, Ford, Grant, Hamilton, Haskell, Kearny, Morton, Seward, Stanton, Stevens, Wichita, Greeley, and Scott Counties	01/01/17 - 12/31/17 5 times daily
KULY 1420 AM Partnership Ingstad Family	KBUF Radio	Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	01/01/17 - 12/31/17 Two times a day

Listing of Advertising (2017)

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Pandora Media, Inc.	Satellite Radio	Big Bow, Coolidge, Deerfield, Holcomb, Horace, Hugoton, Johnson City, Kendall, Lakin, Leoti, Manter, Moscow, Marienthal, Richfield, Rolla, Satanta, Scott City, Sublette, Syracuse, Tribune, Ulysses	01/01/17 - 12/31/17 127,000 per month per 1 user
Doric Theatre, LLC	Movie Previews	Big Bow, Coolidge, Deerfield, Holcomb, Horace, Hugoton, Johnson City, Kendall, Lakin, Leoti, Manter, Moscow, Marienthal, Richfield, Rolla, Satanta, Scott City, Sublette, Syracuse, Tribune, Ulysses	01/01/17 - 12/31/17 Four times weekly
The Scott County Record	Newspaper	Scott County	01/01/17 - 12/31/17 Weekly
Leoti Standard	Newspaper	Wichita County	01/01/17 - 12/31/17 Weekly
Greeley County Republican	Newspaper	Greeley County	01/01/17 - 12/31/17 Weekly
Haskell County Monitor Chief	Newspaper	Haskell County	01/01/17 - 12/31/17 Weekly
Faith Publishing, LLC Hugoton Hermes	The Newspaper	Stevens County	01/01/17 - 12/31/17 Weekly
J & D Publishing, Inc. The Western Times	Newspaper	Wallace County	01/01/17 - 12/31/17 Weekly
Johnson Pioneer	Newspaper	Stanton County	01/01/17 - 12/31/17 Weekly
Kathy J McVey Lakin Independent	The Newspaper	Kearny County	01/01/17 - 12/31/17 Weekly
Syracuse Journal	Newspaper	Hamilton County	01/01/17 - 12/31/17 Weekly
Southwest KS Publications, Inc. Ulysses News	The Newspaper	Grant County	01/01/17 - 12/31/17 Weekly
Pioneer Communications Billing Statement - Kansas Telecommunications Access Program and Relay Service	Bill Insert	Pioneer Communications telephone service areas in Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	12/31/2017
Pioneer Communications Billing Statement - ETC Service Annual Notice	Bill Insert	Pioneer Communications telephone service areas in Grant, Hamilton, Haskell, Kearny, Morton, Stanton, and Stevens Counties	2/28/2017
Pioneer Communications Facebook Page www.facebook.com/Pioneer Communications	Internet	All Internet-accessible areas	01/01/17 - 12/31/17 Daily

Listing of Advertising (2017)

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
Pioneer Communications Twitter	Internet	All Internet-accessible areas	01/01/17 - 12/31/17 Daily
Pioneer Communications Website www.pioncomm.net	Internet Website	All Internet-accessible areas	01/01/17 - 12/31/17 Daily

[illegible]

(Please type or print legibly)

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).

Printed/Typed Name