

**USCOC of Nebraska/Kansas LLC dba U.S. Cellular
Docket No. 24-GIMT-612-GIT
Attachment 1**

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 Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 24-GIMT-612-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 Federal and Kansas Support Received)

1. My title is Vice President, Government Affairs, United States Cellular Corporation (UScellular) In this capacity, I am in a position of authority to direct how federal high-cost Universal Service Fund (USF), including Legacy or Frozen high-cost Loop support (HCL/FHCS), Safety Valve support (SVS), Connect America Cost Model (CACM) support, Connect America Fund (CAF I/CAF II) support, Alternative Connect America Cost Model (A-CAM/ACAM II) support, Rural Broadband Experiment support (RBE), Rural Digital Opportunity Fund (RDOF) support, and/or Kansas Universal Service Fund (KUSF) support received will be used and by this certification I am binding UScellular to the statements made in this certification.

2. UScellular was named as an Eligible Telecommunications Carrier (ETC) by the Kansas Corporation Commission (KCC) for federal support purposes in Docket No. 06-USCZ-519-ETC by order dated February 10, 2006.

3. By this affidavit, I certify that all federal high-cost USF, including HCL, FHCS, SVS, CAF I/CAF II, A-CAM/ACAM II, RBE, RDOF, and/or KUSF received by UScellular was used in the proceeding calendar year **2023** and will be used in the new calendar year **2025 only** for the provision, maintenance, and

**Docket No. 24-GIMT-612-GIT
Attachment 1**

upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Federal 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.)

A handwritten signature in black ink, appearing to read 'R. Thompson', written over a horizontal line.

Rebecca M. Thompson

Executed on June 25th, 2024.

Email address: Rebecca.Thompson@uscellular.com

**USCOC of Nebraska/Kansas LLC dba U.S. Cellular
Docket No. 24-GIMT-612-GIT
Attachment 2
[BLANK – APPLICABLE ONLY TO LECs]**

**USCOC of Nebraska/Kansas LLC dba U.S. Cellular
Docket No. 24-GIMT-612-GIT
Attachment 3
CONFIDENTIAL [REDACTED]**

**USCOC of Nebraska/Kansas LLC dba U.S. Cellular
Docket No. 224-GIMT-612-GIT
Attachment 4
CONFIDENTIAL [REDACTED]**

**USCOC of Nebraska/Kansas LLC dba U.S. Cellular
Docket No. 24-GIMT-612-GIT
Attachment 5**

Annual ETC Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT

1. Did your company experience any outage in the prior calendar year, as that term is defined in 47 C.F.R. § 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 C.F.R. § 4.5(e)?

UScellular's outage report is included as Attachment 6.

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.

To ensure all existing and potential customers receive the best possible wireless service, when service issues are identified UScellular will:

- Inspect the customer's handset to ensure it is functioning properly and ensure that it has been properly programmed. If necessary, handsets under warranty will be promptly replaced or repaired. In circumstances where the phone is no longer under warranty, the customer will be made aware of his/her handset replacement options, i.e. repair, purchase of a new or used handset. Customer will also be advised of available modifications to his equipment that may allow the phone to successfully connect to UScellular's network.
- Inspect elements of UScellular's network to ensure that it is functioning as designed. If necessary, adjustments and repairs will be made as soon as practical and in a manner that has the least impact upon the customers. UScellular will perform drive testing in the affected area, if necessary, to determine the availability and strength of wireless signals. Also, UScellular will determine if the nearest cell site can be modified to serve the affected area.
- In certain situations, customers requesting service may reside outside of UScellular's CGSA but within UScellular's ETC area. To ensure that customers in this situation can receive wireless service, UScellular has in place comprehensive roaming agreements with other wireless carriers and "UScellular" service will be provided via other carriers' networks at no additional cost to the customer. However, in some instances, no cellular coverage from any cellular network is available.

UScellular continuously monitors its network for trouble spots, including areas where cellular signals are weak, non-existent or lacking due to capacity issues. Once a trouble spot is identified, UScellular explores possible solutions and works to implement

solution(s) as soon as practical. UScellular had sixteen requests for service from potential customers within its service area that were unfulfilled during 2023.

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

Complaints per 1,000 connections in calendar year 2023 equaled 0.27%.

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)
NOT APPLICABLE TO USCELLULAR

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 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 _____ (date).

Signature

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 Vice President, Government Affairs of United States Cellular Corporation (UScellular). In this capacity, I am in a position of authority to certify whether UScellular is complying with required quality of service standards. I am binding UScellular to the statements made in this certification.

2. By this affidavit, I certify that UScellular is in compliance with the CTIA Code.

**24-GIMT-612-GIT
Attachment 5**

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 25th, 2024.

A handwritten signature in black ink, appearing to read 'R. Thompson', written over a horizontal line.

Rebecca M. Thompson

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 C.F.R § 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 Vice President, Government Affairs of United States Cellular Corporation (UScellular). In this capacity, I am in a position of authority to certify whether UScellular is able to function in an emergency. I am binding UScellular to the statements made in this certification.

2. By this affidavit, I certify that UScellular 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 25th, 2024.



Rebecca M. Thompson

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services (including Lifeline services) throughout the service area for which it has been designated “using media of general distribution.”

In 2023, UScellular advertised its service offerings throughout its licensed service area in Kansas. Advertising media used to advertise service offerings included television, radio, newspaper, outdoor media and the internet. The mix of advertising media used is designed to reach the largest target audience possible and the message is structured to pique consumer interest in the products offered by UScellular. The cellular telephone industry is very competitive. Successful service providers must continuously reach out to existing and potential subscribers to ensure they are aware of the latest technology and service offerings. UScellular is including Lifeline advertising information with this report.

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

UScellular has a wide variety of rate plans that provide local usage consistent with 47 C.F.R. Sec. 54.101(a)(2). To date, the FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, but has concluded that a competitive ETC must demonstrate that it offers at least one rate plan that is comparable to the local usage plan of the ILEC serving the same area. UScellular offers several rate plans which provide customers with a variety of local usage included within the flat monthly rate. Any minimum local usage requirement established by the FCC will be applicable to all designated ETCs, and UScellular will comply with any and all minimum local usage requirements adopted by the FCC. Current plan offerings may be found at <http://www.uscellular.com/plans/index.html>.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

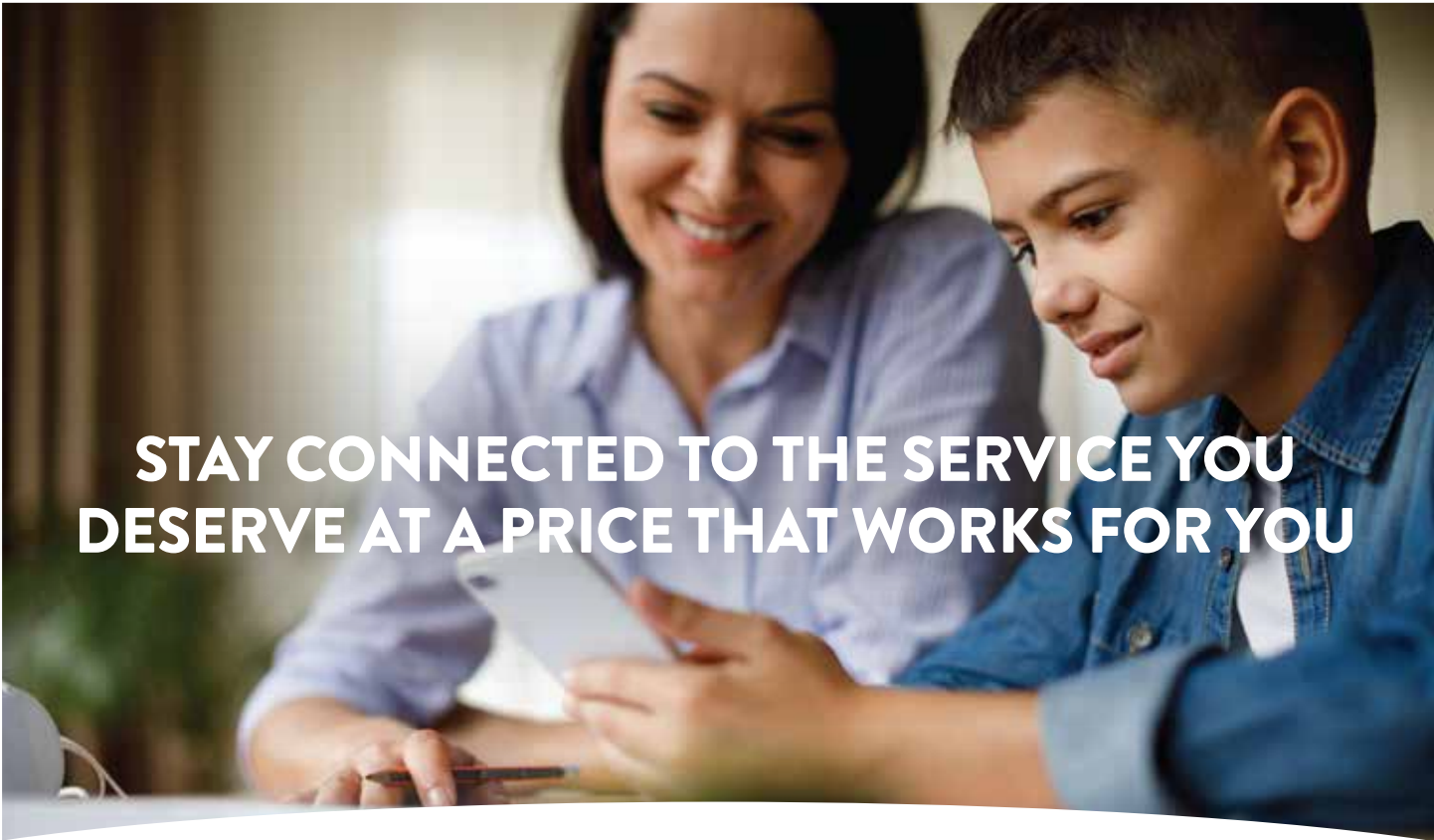
1. My title is Vice President, Government Affairs of United States Cellular Corporation (UScellular). In this capacity, I am in a position of authority to certify whether UScellular offers a local usage plan comparable to that of the incumbent. I am binding UScellular to the statements made in this certification.

2. By this affidavit, I certify that UScellular 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 June 25th, 2024.



Rebecca M. Thompson



**STAY CONNECTED TO THE SERVICE YOU
DESERVE AT A PRICE THAT WORKS FOR YOU**

— **LIFELINE PLANS START AT** —

\$34.25 /MO.

— **BEFORE LIFELINE DISCOUNT** —

UScellular® is committed to making wireless accessible to families in the communities we serve. To learn more, visit [uscellular.com/plans/specialty-plans/lifeline](https://www.uscellular.com/plans/specialty-plans/lifeline) or call 800-447-1339.



Things we want you to know: Lifeline is a federal government benefit program and only qualified persons may participate. Lifeline service may not be transferred to any other individual. Applicants must present documentation of household income or participation in qualifying programs. Lifeline is only available for one phone line per household, whether landline or wireless. The Lifeline calling plan/Lifeline discounts are only available to residents in states where UScellular is an Eligible Telecommunications Carrier (ETC). Eligibility to receive Lifeline discounts will be verified annually. In areas in which UScellular receives support from the Federal Universal Service Fund, all reasonable requests for service must be met. Unresolved questions concerning services availability can be directed to the Kansas Corporation Commission Office of Public Affairs and Consumer Protection at 800-662-0027. Lifeline calling plans support all of the federal universal services provided for in 47CFR Sec. 54.101. Additional terms and conditions apply. See store or [uscellular.com](https://www.uscellular.com) for details. ©2024 UScellular

UScellular Lifeline Advertisement Kansas 2023

Lifeline advertising consisted of a variety of methods. Included below are newspaper ads, directly mailed to consumers and also digital paid search spend.

Lifeline Paid Search Spend by State Report

<https://www.uscellular.com/plans/specialty-plans/lifeline>
<https://www.uscellular.com/plans/specialty-plans/lifeline-qualifications>

January 1, 2023 - December 31, 2023

State	Impr.	Clicks	Cost
Kansas	6,143	713	\$1,093.75

Geo/Zip Code	Household Count	Client Name on Piece	IH Week	IH Date	Product	Direct Mail
66830	120	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays
66833	265	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays
66835	528	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays
66845	500	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays
66801	12383	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays
66854	361	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays
66864	174	US CELLULAR	27-Aug-23	29-Aug-23	Wrap	KS Topeka/Manhattan/Hays

66865	367	US CELLULAR	27-Aug- 23	29-Aug- 23	Wrap	KS Topeka/Manhattan/Hays
66868	299	US CELLULAR	27-Aug- 23	29-Aug- 23	Wrap	KS Topeka/Manhattan/Hays
66830	120	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66833	264	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66835	522	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66845	479	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66801	12389	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66854	364	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66864	177	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66865	371	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays
66868	299	US CELLULAR	22-Oct- 23	24-Oct- 23	Wrap	KS Topeka/Manhattan/Hays

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Attachment 6
CONFIDENTIAL [REDACTED]**