



May 16, 2017
Via Overnight Delivery

Ms. Amy Green, Secretary
Kansas Corporation Commission
1500 SW. Arrowhead Road
Topeka, KS 66604-4027

Received
on

MAY 17 2017

**RE: NetFortris Acquisition Co., Inc.
Application for Approval of Intrastate Allocation Methodology
Docket No. 17-GIMT-008-GIT**

by
State Corporation Commission
of Kansas

Dear Ms. Green:

Enclosed for filing please find the original and two (2) copies of the above referenced filing submitted on behalf of NetFortris Acquisition Co., Inc. ("Company").

The intrastate factors to be used by the Company, as set forth in the Attachment to this filing, are being submitted under Seal as Confidential. Please handle in accordance with your established procedures for confidential material.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

Carey Roesel
Consultant to NetFortris Acquisition Co., Inc.

cc: Pam Bathke - NetFortris
Service List
file: NetFortris - KS Other
tms: KSx1701

Enclosures
CR/gs

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

In the Matter of an Investigation to Determine
the Assessment Rate for the Twenty-First Year of
the Kansas Universal Service Fund, Effective
March 1, 2017.

)
)
)
)

Docket No. 17-GIMT-008-GIT

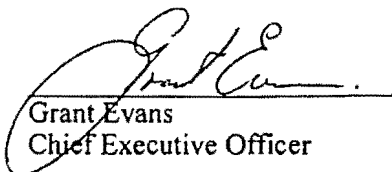
**NETFORTRIS ACQUISITION CO., INC.
APPLICATION FOR APPROVAL OF INTRASTATE ALLOCATION METHODOLOGY**

1. NetFortris Acquisition Co., Inc. ("NetFortris") respectfully requests that the State Corporation Commission ("Commission") approve its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund ("KUSF") for its resold wireless services.
2. In support hereof, NetFortris files the accompanying affidavit of Grant Evans, Chief Executive Officer.
3. NetFortris has opted to utilize a traffic study rather than the FCC safe harbor to allocate its regulated wireless revenues between the intrastate and interstate/international jurisdictions. As explained in more detail in Mr. Evan's affidavit, NetFortris' traffic study relies upon actual minutes of use ("MOU") data for both Federal Universal Service Fund ("FUSF") and KUSF purposes, using the inverse of the federal percentage derived from the study to determine the appropriate percentage for KUSF reporting and remittance purposes.
4. Because the traffic study contains proprietary and confidential trade secret actual MOU data, the factors developed using it are being filed under seal.

WHEREFORE, NetFortris Acquisition Co., Inc. respectfully requests that the Commission approve NetFortris' company-specific traffic study and its use of the inverse of the federal percentage derived therefrom for KUSF reporting purposes.

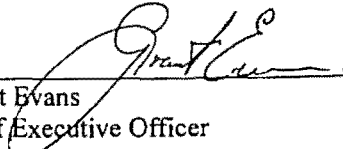
Dated: ^{May} ~~April~~ 12, 2017

Respectfully Submitted,


Grant Evans
Chief Executive Officer

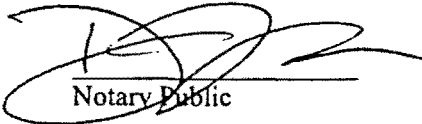
VERIFICATION

I, Grant Evans, being of lawful age and duly sworn, state that I have read the above and foregoing Application and verify that the statements contained therein are true and correct to the best of my knowledge and belief.



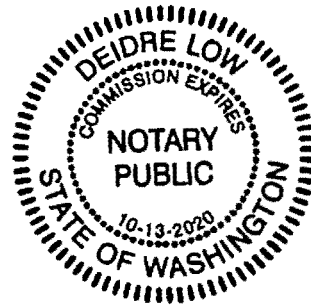
Grant Evans
Chief Executive Officer

Subscribed and sworn to before me this 12 day of ~~April~~
May, 2017.



Notary Public

My Commission Expires: 10/13/2020



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

In the Matter of an Investigation to Determine)	
the Assessment Rate for the Twenty-First Year of)	Docket No. 17-GIMT-008-GIT
the Kansas Universal Service Fund, Effective)	
March 1, 2017.)	

State of California)

County of San Francisco)

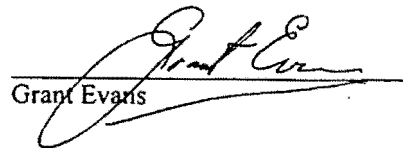
**AFFIDAVIT OF GRANT EVANS
ON BEHALF OF NETFORTRIS ACQUISITION CO., INC.**

I, Grant Evans, being of lawful age and duly sworn, state as follows:

1. I am employed by NetFortris Acquisition Co., Inc. ("NetFortris") as Chief Executive Officer. In this capacity, I am responsible for reporting and remittances relating to the Kansas Universal Service Fund ("KUSF") for NetFortris.
2. NetFortris' allocation methodology for KUSF purposes is based on a company-specific traffic study, which is used for both Federal Universal Service Fund ("FUSF") and KUSF purposes. The traffic study is based on actual call origination and termination minutes of use ("MOU") data obtained from NetFortris' call detail records, which MOU are classified as interstate, intrastate or international. NetFortris derives the percentage of interstate/international MOU by dividing the number of interstate and international MOU into total MOU. This percentage is accepted by the Federal Communications Commission for FUSF reporting purposes.
3. NetFortris will use the inverse of the federal percentage derived therewith to calculate the percentage for KUSF reporting purposes ($100\% - \text{FUSF \%} = \text{KUSF \%}$). This approach provides a fair and balanced symmetry between federal and state USF programs, and complies with the Commission's directive that carriers use the same allocation methodology for FUSF and KUSF purposes.
4. NetFortris will apply the KUSF percentage to its Kansas retail regulated wireless revenues to determine the amount it remits to the KUSF.

5. The intrastate factors that will be used by NetFortris for KUSF purposes for the KUSF reporting period Q4 (December 2016 – February 2017) are set forth on the confidential and proprietary attachment to my affidavit which is being filed under seal. The study reflects the Kansas traffic that was generated in the third quarter of 2016.

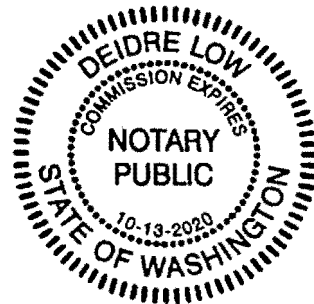
Pursuant to Kan. Stat. Ann. 53-601, I certify that the foregoing is true and correct to the best of my knowledge.


Grant Evans

Subscribed and sworn to before me on this 15 day of ^{May}~~April~~, 2017.


Notary Public

My Commission Expires: 10/13/2020



NetFortris Acquisition Co., Inc.
Attachment - Traffic Study Allocation Factors

Traffic for Q3 2016	Minutes	Percentage
Interstate	***	***
Intrastate	***	***
Total	***	

*** Confidential and Proprietary Information REDACTED***

CERTIFICATE OF SERVICE

Technologies Management, Inc. certifies that a true and correct copy of the above and foregoing NetFortris Acquisition Co., Inc. Application for Approval of Intrastate Allocation Methodology was served via U.S. electronic mail this 16th day of May, 2017, to the parties listed below appearing on the Commission's service list as last modified on February 9, 2017.

THOMAS J. CONNORS, Attorney at Law
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
tj.connors@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@CURB.KANSAS.GOV

SHONDA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
sd.smith@CURB.KANSAS.GOV

BEAU REBEL, GENERAL MANAGER
GBT COMMUNICATIONS, INC.
103 LINCOLN
PO BOX 229
RUSH CENTER, KS 67575
brebel@gbta.net

COLLEEN R. JAMISON
JAMES M. CAPLINGER, CHARTERED
823 SW 10TH AVE
TOPEKA, KS 66612-1618
COLLEEN@CAPLINGER.NET

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
a.latif@kcc.ks.gov

MARK E. CAPLINGER
MARK E. CAPLINGER, P.A.
7936 SW INDIAN WOODS PL
TOPEKA, KS 66615-1421
mark@caplingerlaw.net

BRUCE A. NEY, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO. D/B/A AT&T KANSAS
816 CONGRESS AVE
SUITE 1100
AUSTIN, TX 78701-2471
bn7429@att.com

DIANE C. BROWNING, ATTORNEY
SPRINT COMMUNICATIONS COMPANY L.P.
KSOPHN0314-3A459
6450 SPRINT PKWY
OVERLAND PARK, KS 66251
DIANE.C.BROWNING@SPRINT.COM

JOHN R. IDOUX, DIRECTOR KANSAS GOVERNMENTAL AFFAIRS
UNITED TELEPHONE CO. OF KANSAS D/B/A CENTURYLINK
600 NEW CENTURY PKWY
NEW CENTURY, KS 66031
john.idoux@centurylink.com

KEVIN K. ZARLING
UNITED TELEPHONE CO. OF KANSAS D/B/A CENTURYLINK
400 W 15TH ST STE 315
AUSTIN, TX 78701-1647
KEVIN.K.ZARLING@CENTURYLINK.COM



Technologies Management, Inc.