

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

In the Matter of the Audit of 8 x 8 Inc. by the )  
Kansas Universal Service Fund (KUSF) ) Docket No. 24-88IV-112-KSF  
Administrator Pursuant to K.S.A. 66-2010(b) for )  
KUSF Operating Year 26, Fiscal Year March )  
2022-February 2023.

**8X8, INC. COMPLIANCE SUBMISSION**

COMES NOW 8x8, Inc. (“8x8”) respectfully to submit in this docket the pleadings and associated traffic studies it submitted in the general universal service fund dockets for Fiscal Years 26 through 28.

1. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction. Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

2. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report’s recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022-February 2023*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel.

May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

3. On July 8, 2024, 8x8 filed the required pleadings in the general Kansas Universal Service Fund dockets for Fiscal Years 25 through 28.

4. To ensure the fullness of the record in this audit docket and for the avoidance of any doubt regarding its compliance, 8x8 hereby files the same pleadings into this docket.

WHEREFORE 8x8 respectfully requests that the Commission accept the pleadings and associated traffic studies in compliance with its order in the above-captioned docket dated May 30, 2024.

Date: July 9, 2024

Respectfully submitted,

DocuSigned by:  
*Brendan Kasper*  
C0533E920C6D43D...

Brendan Kasper  
Associate General Counsel, Regulatory and  
Data Protection Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008  
(646) 751-7323

## VERIFICATION

I, Brendan Kasper, am the Associate General Counsel, Regulatory and Data Protection Officer for 8x8, Inc. I have reviewed the foregoing, and I verify under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2024.

DocuSigned by:  
*Brendan Kasper*  
C0533E920C6D43D...

---

Brendan Kasper  
Associate General Counsel, Regulatory and  
Data Protection Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008  
(646) 751-7323

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Compliance Submission was served via electronic mail this 9<sup>th</sup> day of July, 2024, to the parties below.

*Allison Vuono*

---

Allison Vuono  
Senior Legal Analyst  
HWG LLP  
1919 M Street NW, 8<sup>th</sup> Floor  
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**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

|  |   |                            |
|--|---|----------------------------|
| In the Matter of an Investigation to Determine the | ) |                            |
| Affordable Local Service Rates for                 | ) |                            |
| Rate-of-Return Regulated Carriers and the          | ) | Docket No. 21-GIMT-095-GIT |
| Annual Assessment Rate for the Twenty-Fifth        | ) |                            |
| Year of the Kansas Universal Service Fund,         | ) |                            |
| Effective March 1, 2021                            | ) |                            |

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY  
FOR UNIVERSAL SERVICE FUND REPORTING**

COMES NOW 8x8, Inc. (“8x8”) respectfully to request that the Commission permit its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund (“KUSF”).

1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9 (rel. Jan. 24, 2012).*

2. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8, which the Commission had requested. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction.

Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

3. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022-February 2023*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel. May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY25. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2021, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:  
*Brendan Kasper*  
C0533E920C6D43D.

---

**Brendan Kasper**  
Associate General Counsel, Regulatory and  
Data Protection Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008  
(646) 751-7323

VERIFICATION

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024.

Suzanne Seandel  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

See attached  
Acknowledgment

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8<sup>th</sup> day of July, 2024, to the parties below.



---

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In the Matter of an Investigation to Determine the )  
Affordable Local Service Rates for )  
Rate-of-Return Regulated Carriers and the ) Docket No. 21-GIMT-095-GIT  
Annual Assessment Rate for the Twenty-Fifth )  
Year of the Kansas Universal Service Fund, )  
Effective March 1, 2021 )

**AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.**

I, Suzanne Michelle Seandel, state as follows:

1. I am employed by 8x8, Inc. (“8x8”) as Chief Accounting Officer. In this capacity I am responsible for, among other things, reporting and payments to the Kansas Universal Service Fund.

2. When reporting revenues to the Universal Service Administrative Company for the federal universal service (“USF”) program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY25 revenue reporting (and federal USF reporting for calendar year 2021) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.

  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel,  
Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See attached Acknowledgment*

CALIFORNIA ACKNOWLEDGMENT

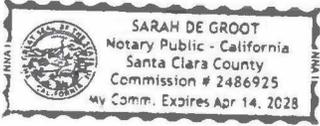
CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California }
County of Santa Clara }
On July 8, 2024 before me, Sarah de Groot, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Suzanne Seandel
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.
WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Sarah de Groot
Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document:
Document Date: Number of Pages:
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Signer's Name: Signer's Name:
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[ ] Partner - [ ] Limited [ ] General [ ] Partner - [ ] Limited [ ] General
[ ] Individual [ ] Attorney in Fact [ ] Individual [ ] Attorney in Fact
[ ] Trustee [ ] Guardian or Conservator [ ] Trustee [ ] Guardian or Conservator
[ ] Other: [ ] Other:
Signer is Representing: Signer is Representing:

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT: 8X8, INC. TRAFFIC STUDY**

**Attachment Redacted in its Entirety**

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

In the Matter of an Investigation to Determine the     )  
Annual Assessment Rate for the Twenty-Sixth     )     Docket No. 22-GIMT-142-GIT  
Year of the Kansas Universal Service Fund,     )  
Effective March 1, 2022     )

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY  
FOR UNIVERSAL SERVICE FUND REPORTING**

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1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9* (rel. Jan. 24, 2012).

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4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY26. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2022, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:  
*Brendan Kasper*  
C0533E920C6D43D

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Brendan Kasper  
Associate General Counsel, Regulatory and  
Data Protection Officer  
8x8, Inc.  
675 Creekside Way  
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(646) 751-7323

**VERIFICATION**

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024.

*Suzanne Seandel*

Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

~~Sworn before me this \_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.~~

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See attached  
Acknowledgment*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8<sup>th</sup> day of July, 2024, to the parties below.



---

Spencer Kelly  
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In the Matter of an Investigation to Determine the )  
Annual Assessment Rate for the Twenty-Sixth ) Docket No. 22-GIMT-142-GIT  
Year of the Kansas Universal Service Fund, )  
Effective March 1, 2022 )

**AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.**

I, Suzanne Michelle Seandel, state as follows:

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2. When reporting revenues to the Universal Service Administrative Company for the federal universal service (“USF”) program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY26 revenue reporting (and federal USF reporting for calendar year 2022) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.

  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel,  
Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See attached Acknowledgment*

**CALIFORNIA ACKNOWLEDGMENT**

**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

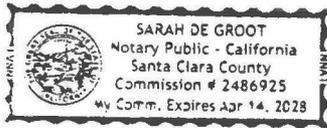
On July 8, 2024 before me, Sarah de Groot, Notary Public  
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Scandel  
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Sarah de Groot  
Signature of Notary Public

**OPTIONAL**

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

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Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_

Corporate Officer – Title(s): \_\_\_\_\_

Partner –  Limited  General

Individual  Attorney in Fact

Trustee  Guardian or Conservator

Other: \_\_\_\_\_

Signer is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_

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Other: \_\_\_\_\_

Signer is Representing: \_\_\_\_\_

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT: 8X8, INC. TRAFFIC STUDY**

**Attachment Redacted in its Entirety**

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

In the Matter of an Investigation to Determine the )  
Affordable Local Service Rates for )  
Rate-of-Return Regulated Carriers and the ) Docket No. 23-GIMT-261-GIT  
Annual Assessment Rate for the Twenty-Seventh )  
Year of the Kansas Universal Service Fund, )  
Effective March 1, 2023 )

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY  
FOR UNIVERSAL SERVICE FUND REPORTING**

COMES NOW 8x8, Inc. (“8x8”) respectfully to request that the Commission permit its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund (“KUSF”).

1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9 (rel. Jan. 24, 2012).*

2. On April 22, 2024, Vantage Point Solutions submitted to the Commission a report detailing its audit of 8x8, which the Commission had requested. Vantage Point Solutions found that 8x8 was in compliance with its KUSF obligations except that it had not submitted pleadings to the Commission prior to using a traffic study to allocate revenues to the intrastate jurisdiction.

Vantage Point Solutions recommended that the Commission direct 8x8 to submit a pleading regarding its use of a traffic study for FY25, FY26, FY27, and going forward. Letter from Dennis C. Smith, Vantage Point Solutions, to Lynn M. Retz, Executive Director, Kansas Corporation Commission, Docket No. 24-88IV-112-KSF, Attach. at 3 (filed Apr. 22, 2024).

3. On May 30, 2024, the Commission adopted the recommendations in the Vantage Point Solution Audit Report and directed 8x8 to act on the Report's recommendations within 30 days. *In the Matter of the Audit of 8 x 8 Inc. by the Kansas Universal Service Fund (KUSF) Administrator Pursuant to K.S.A. 66-2010(b) for KUSF Operating Year 26, Fiscal Year March 2022-February 2023*, Order Adopting Audit Report, Docket No. 24-88IV-112-KSF, at 2-3 (rel. May 30, 2024). On July 1, 2024, Commission staff agreed by email to 8x8's request for an additional week to prepare and submit the necessary information.

4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it used to allocate revenue to the intrastate jurisdiction for FY27. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 used for federal USF purposes during 2023, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:  
*Brendan Kasper*  
C0533E920C6D43D...

---

**Brendan Kasper**  
Associate General Counsel, Regulatory and  
Data Protection Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008  
(646) 751-7323

**VERIFICATION**

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024.

Suzanne Seandel  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See Attached Acknowledgment*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8<sup>th</sup> day of July, 2024, to the parties below.



---

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BRUCE NEY, AVP - SENIOR LEGAL COUNSEL, SWB  
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1025 LENOX PARK BLVD  
ATLANTA, GA 30319  
BRUCE.NEY@ATT.COM

In the Matter of an Investigation to Determine the )  
Affordable Local Service Rates for )  
Rate-of-Return Regulated Carriers and the ) Docket No. 23-GIMT-261-GIT  
Annual Assessment Rate for the Twenty-Seventh )  
Year of the Kansas Universal Service Fund, )  
Effective March 1, 2023 )

**AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.**

I, Suzanne Michelle Seandel, state as follows:

1. I am employed by 8x8, Inc. ("8x8") as Chief Accounting Officer. In this capacity I am responsible for, among other things, reporting and payments to the Kansas Universal Service Fund.

2. When reporting revenues to the Universal Service Administrative Company for the federal universal service ("USF") program, 8x8 uses a traffic study to allocate its interconnected VoIP revenues between the interstate and intrastate jurisdictions.

3. When reporting revenues to the Kansas Corporation Commission for the Kansas USF program, 8x8 uses the same traffic study as it uses for the federal USF reporting. It determines its intrastate revenues as the inverse of its interstate revenues.

4. The traffic study used for FY27 revenue reporting (and federal USF reporting for calendar year 2023) is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.

  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel,  
Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See attached Acknowledgment*

**CALIFORNIA ACKNOWLEDGMENT**

**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Santa Clara }

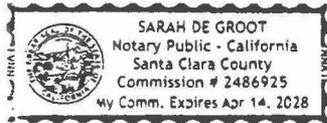
On July 8, 2024 before me, Sarah de Groot, Notary Public  
Date Here Insert Name and Title of the Officer

personally appeared Suzanne Seandel  
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Place Notary Seal and/or Stamp Above

Signature Sarah de Groot  
Signature of Notary Public

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Signer's Name: \_\_\_\_\_

Corporate Officer – Title(s): \_\_\_\_\_

Partner –  Limited  General

Individual  Attorney in Fact

Trustee  Guardian or Conservator

Other: \_\_\_\_\_

Signer is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_

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**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT: 8X8, INC. TRAFFIC STUDY**

**Attachment Redacted in its Entirety**

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

In the Matter of an Investigation to Determine the     )  
Annual Assessment Rate for the Twenty-Eighth     )     Docket No. 24-GIMT-229-GIT  
Year of the Kansas Universal Service Fund,     )  
Effective March 1, 2024     )

**8X8, INC. REQUEST FOR APPROVAL OF USE OF TRAFFIC STUDY  
FOR UNIVERSAL SERVICE FUND REPORTING**

COMES NOW 8x8, Inc. (“8x8”) respectfully to request that the Commission permit its use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund (“KUSF”).

1. On January 24, 2012, the Commission adopted the requirement that wireless and interconnected VoIP providers submit a pleading to the Commission, accompanied by an affidavit, prior to using a traffic study to allocate revenue to the intrastate jurisdiction. These providers must also update the Commission annually either to update their methodology or to submit an affidavit verifying that the methodology has not changed. *In the Matter of a General Investigation to Determine the Assessment Rate for the Sixteenth Year of the Kansas Universal Service Fund Effective March 1, 2012, Order Setting the Kansas Universal Service Fund Assessment Rate for Year Sixteen and Cancelling Hearing, Docket No. 12-GIMT-168-GIT, at 3 ¶ 9 (rel. Jan. 24, 2012).*

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4. In accordance with the Commission's order adopting the Audit Report, 8x8 hereby files this pleading to provide the traffic study it is using to allocate revenue to the intrastate jurisdiction for FY28. As explained in the accompanying affidavit of Suzanne Michelle Seandel, this is the same traffic study that 8x8 is using for federal USF purposes for calendar year 2024, and the intrastate allocation of traffic is the inverse of the interstate allocation 8x8 used for federal USF purposes.

5. Because the traffic study contains confidential commercial information, 8x8 includes a redacted version with this public pleading, and has submitted a confidential version under separate cover.

WHEREFORE 8x8 respectfully requests that the Commission enter an order approving 8x8's company-specific traffic study using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as its just and proper.

Date: July 8, 2024

Respectfully submitted,

DocuSigned by:  
*Brendan Kasper*  
C0533E920C8D43D

---

Brendan Kasper  
Associate General Counsel, Regulatory and  
Data Protection Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008  
(646) 751-7323

**VERIFICATION**

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

I, Suzanne Michelle Seandel, am the Chief Accounting Officer for 8x8, Inc. I have reviewed the foregoing pleading, and I verify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct.

Executed on 7/8/2024

*Suzanne Seandel*  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel, Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See attached Acknowledgment*

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing 8x8, Inc. Request for Approval of Use of Traffic Study for Universal Service Reporting was served via electronic mail this 8<sup>th</sup> day of July, 2024, to the parties below.



---

Spencer Kelly  
Senior Legal Analyst  
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Year of the Kansas Universal Service Fund, )  
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**AFFIDAVIT OF SUZANNE MICHELLE SEANDEL ON BEHALF OF 8X8, INC.**

I, Suzanne Michelle Seandel, state as follows:

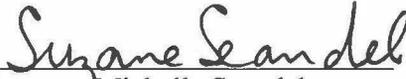
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4. The traffic study that is being used for federal USF reporting for calendar year 2024 is attached hereto.

5. The information contained herein is true and correct to the best of my knowledge and belief.

  
Suzanne Michelle Seandel  
Chief Accounting Officer  
8x8, Inc.  
675 Creekside Way  
Campbell, CA 95008

Sworn before me this \_\_\_ day of \_\_\_\_\_, 2024, by Suzanne Michelle Seandel,  
Chief Accounting Officer, 8x8, Inc.

\_\_\_\_\_  
Notary Public

Printed Name of Notary: \_\_\_\_\_

My Commission expires: \_\_\_\_\_

*See attached  
Acknowledgment*

**CALIFORNIA ACKNOWLEDGMENT**

**CIVIL CODE § 1189**

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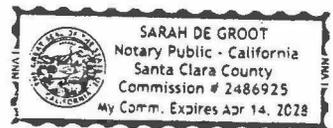
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Date Here Insert Name and Title of the Officer

personally appeared Suzanne Seandel  
Name(s) of Signer(s)

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I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Sarah de Groot  
Signature of Notary Public

Place Notary Seal and/or Stamp Above

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Corporate Officer – Title(s): \_\_\_\_\_

Corporate Officer – Title(s): \_\_\_\_\_

Partner –  Limited  General

Partner –  Limited  General

Individual  Attorney in Fact

Individual  Attorney in Fact

Trustee  Guardian or Conservator

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Other: \_\_\_\_\_

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