

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

In the Matter of Certification of Compliance    )  
with Section 254(e) of the Federal            )  
Telecommunications Act of 1996 and            )  
Certification of Appropriate Use of Kansas    )  
Universal Service Fund Support.                )

Docket No. 25-GIMT-332-GIT

**NOTICE OF FILING OF STAFF'S REPORT AND RECOMMENDATION**  
**(PUBLIC)**

The Staff of the Kansas Corporation Commission (“Staff” and “Commission,” respectively) hereby files its Report and Recommendation (“R&R”), dated September 17, 2025, recommending the Commission submit letters to the Federal Communications Commission (“FCC”) and the Universal Service Administrative Company (“USAC”) on or before October 1, 2025, to certify that all federal high-cost support provided to carriers, listed on Exhibit 1 to its R&R, was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Further, Staff recommends the Commission assess penalties in the following respective amounts for late filings by carrier: i-Wireless, LLC, \$200; Mercury Wireless \$600; Skybeam, LLC, \$300; Plains Internet, LLC, \$1,600; Sage Telecom \$400; and Yourtel America, Inc., \$800.

WHEREFORE, Staff respectfully requests that the Commission issue an order adopting its recommendation.

Respectfully Submitted,

Brett Berry

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Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

Laura Kelly, Governor

**REPORT AND RECOMMENDATION  
UTILITIES DIVISION**

**TO:** Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

**FROM:** Hemant Bhagat, Senior Telecommunications Analyst  
Steve Garrett, Deputy Chief of Telecommunications  
Janet Buchanan, Deputy Director of Utilities  
Justin Grady, Director of Utilities

**DATE:** September 17, 2025

**SUBJECT:** DOCKET NO. 25-GIMT-332-GIT

In the Matter of Certification of Compliance with Section 254(e) of the Federal Telecommunications Act of 1996 and Certification of Appropriate Use of Kansas Universal Service Fund Support.

**EXECUTIVE SUMMARY**

On March 11, 2025, the Kansas Corporation Commission (Commission) opened this docket to collect information from Kansas Eligible Telecommunications Carriers (ETCs) to determine whether each ETC used its high-cost Federal Universal Service Fund (FUSF) support appropriately in 2024 and will use that support appropriately in 2026. For an ETC that is determined to have used its FUSF support appropriately, the Commission must certify the use of such support to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC), the FUSF administrator, on or before October 1, 2025. In this docket, the Commission also determines if an ETC used its high-cost Kansas Universal Service Fund (KUSF) support appropriately in 2024 and will use its KUSF support appropriately in 2026.

Staff recommends the Commission submit letters to the FCC and USAC on or before October 1, 2025, to certify that all high-cost FUSF support provided to the Kansas ETCs listed in Exhibit 1 was used in the preceding calendar year (2024) and will be used in the upcoming calendar year (2026) in accordance with 47 U.S.C. § 254(e). Staff also recommends the Commission assess penalties to the following ETCs that submitted their filings after the June 30, 2025, due date: i-Wireless, LLC - \$200, Mercury Wireless - \$600, Plains Internet Service - \$1,600, Sage Telecom Communications, LLC - \$400, Skybeam, LLC - \$300, and Yourtel America, Inc. - \$800.

Staff is filing both a confidential and a redacted Report and Recommendation (R&R) and

Exhibit 2.<sup>1</sup> Exhibit 1 contains only public data; therefore, a confidential version is not being filed.

## **BACKGROUND**

Southwestern Bell Telephone Company d/b/a AT&T Kansas (AT&T Kansas), Brightspeed (Brightspeed),<sup>2</sup> Consolidated Communications of Kansas (Consolidated - KS), and Consolidated Communications of Missouri (Consolidated - MO) are price-cap regulated carriers for FUSF purposes.

AT&T Kansas is an electing carrier in Kansas and does not receive KUSF support. Brightspeed is price-cap regulated in Kansas and its KUSF support is based on a cost model. Consolidated – KS and Consolidated – MO are Rate-of-Return (ROR) regulated carriers in Kansas. All of the rural Incumbent Local Exchange Carriers (RLECs) are ROR-regulated for both FUSF and KUSF purposes.

The 1996 Federal Telecommunications Act, § 254(e), requires that ETCs receiving high-cost FUSF support shall use the support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” In 2001, the FCC began requiring state commissions to file an annual certification affirming that each ETC high-cost FUSF recipient used and will use its FUSF support consistent with § 254(e).<sup>3</sup> The annual certification must be filed no later than October 1 of each year with the FCC and USAC and affirm that all FUSF support provided to an identified ETC within the State was used in the preceding calendar year and will be used in the following calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.<sup>4</sup>

In response to this requirement, the Commission opened Docket No. 01-GIMT-595-GIT to develop a mechanism to ensure ETCs comply with § 254(e). Through collaboration, parties to the docket developed a self-certification form for an ETC to attest that it used and, will use, its FUSF support in compliance with § 254(e). On August 28, 2001, the Commission adopted the self-certification form, which is Attachment 1 in the annual certification.<sup>5</sup>

In 2004, the Commission opened Docket No. 05-GIMT-112-GIT to address whether the ETC self-certification process was sufficient to ensure that ETCs used their FUSF support appropriately. At that time, the Federal-State Joint Board on Universal Service issued a Recommended Decision suggesting the FCC encourage states to consider a more rigorous review to ensure that FUSF support is used properly. On July 21, 2005, the Commission issued an order adopting more comprehensive reporting forms and procedures, beginning with the 2006 certification reporting year.<sup>6</sup>

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<sup>1</sup> The majority of the RLECs filed their USF Expenditures and supporting data as confidential, however, several RLECs agreed to Staff releasing their annual and/or 5-year USF Expenditures as public.

<sup>2</sup> The United Telephone Companies of Kansas includes: United Telephone Companies of Kansas, United Telephone Company of Eastern Kansas, United Telephone of Southcentral Kansas, and Embark Missouri, Inc. These companies have filed applications with the Commission to change their legal names to Brightspeed. See Docket Nos. 24-UTDT-204-CCN, 24-USCT-205-CCN, 24-USET-206-CCN, and 24-UTET-207-CCN

<sup>3</sup> Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, rel. May 23, 2001.

<sup>4</sup> See 47 C.F.R. § 54.314.

<sup>5</sup> Order 3 Adopting Certification Form, Docket No. 01-GIMT-595-GIT, Aug. 28, 2001.

<sup>6</sup> Order, Docket No. 05-GIMT-112-GIT, July 21, 2005.

On October 2, 2006, the Commission adopted additional annual ETC reporting requirements in Docket No. 06-GIMT-446-GIT,<sup>7</sup> including reporting information regarding Quality of Service and Consumer Protection Standards (e.g. network outages, unfulfilled service requests, number of complaints, functionality during an emergency, and advertising obligations) to ensure ETCs are fulfilling these obligations. ETCs report this information in Attachment 5 of the USF Certification Forms.

In 2007, the Commission opened Docket No. 08-GIMT-154-GIT to address whether ETCs should certify their use of KUSF support. On January 30, 2009, the Commission issued an order adopting Staff's Report and modifications to the Certification Forms agreed to by the parties to the docket. The Commission also required ETCs to certify their KUSF funding, in addition to their FUSF funding, beginning in 2009.<sup>8</sup>

Effective January 1, 2012, the FCC began to transition the competitive ETCs' (CETC) FUSF support to the Connect America Fund (CAF) over a five-year period, with a CETC's support to be reduced 20% per year. The FCC, however, determined the phase-down would stop if its new Mobility Fund, Phase II, was not operational by June 30, 2014, ensuring CETCs continue to receive FUSF support until the new mechanism became operational.

Effective March 2013, KUSF support for CETCs began to be phased-out and, effective March 1, 2018, all KUSF support was eliminated for CETCs.<sup>9</sup>

Beginning in 2013, the FCC required ETCs to file Form 481 to report their Quality of Service and Consumer Protection information. The FCC also began to require an ETC to file a copy of its Form 481 with respective state commissions by July 1 of each year. This information is filed with the Commission in Attachment 5 of the USF Certification Forms.

The annual USF Certification Forms adopted by the Commission reflected the FUSF support mechanisms in place at the time they were adopted. As noted above, the FCC transitioned FUSF support from legacy high-cost FUSF Loop Support, which supports the voice network, to newer FUSF support mechanisms that support both voice and broadband capable networks. Based on the FCC's transitioning to new FUSF support mechanisms that also provide support for CETCs, Staff modified the USF Certification Forms to recognize not only the legacy FUSF Loop Support, but also the new FUSF support mechanisms.

In 2015, the FCC offered price cap carriers Connect America Cost Model Phase II (CACM) based support in lieu of legacy FUSF support and also began awarding Connect America Fund (CAF) support to price cap carriers and to CETCs. CACM support was available for a six-year term, with a seventh year offered in certain circumstances.<sup>10</sup> AT&T Kansas and Brightspeed accepted CACM support for Kansas. The Consolidated entities declined CACM support for Kansas.

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<sup>7</sup> Order Adopting Requirements for Designation of Eligible Telecommunications Carriers, Docket No. 06-GIMT-446-GIT, Oct. 2, 2006.

<sup>8</sup> Order Adopting Staff Workshop Report and Issue Resolutions and Soliciting Additional Comments, Docket No. 08-GIMT-154-GIT, Jan. 30, 2009.

<sup>9</sup> K.S.A. 66-2008(c)(4).

<sup>10</sup> In the Matter of Connect America Fund, WC Docket 10-90, Report and Order, Rel. Dec. 18, 2014.

In 2016, the FCC offered ROR-regulated RLECs an opportunity to voluntarily switch from legacy high-cost FUSF support to Alternative Connect America Model (A-CAM) support. In 2016, six RLECs elected to receive A-CAM support, with funding received beginning in 2017. In 2019, the FCC provided the ROR-regulated carriers that did not initially elect to transition to A-CAM support the option to transition to A-CAM II support. Five RLECs elected to receive A-CAM II support, with funding received beginning in 2019.

Also in 2016, the FCC began to implement the Connect America Fund, Phase II Auction (CAF II) to provide FUSF support to any ETC awarded the winning bid for eligible census blocks within a price cap ILEC's service area to deploy voice and broadband services.<sup>11</sup> Five Kansas CETCs accepted and receive CAF II support.

In 2017, the FCC streamlined the annual USF Certification process by eliminating the requirement for a high-cost ETC to file information regarding Quality of Service Standards and Consumer Protection Rules and eliminated the requirement for ETCs to file a copy of their Form 481 with the state commissions.<sup>12</sup> In response, the Commission determined that, beginning with USF Certification due July 1, 2018, ETCs are no longer required to file Form 481 with the Commission.<sup>13</sup>

In 2020, the FCC continued its goal to expand broadband in price cap areas lacking voice and broadband services and began awarding Rural Development Opportunity Fund, Phase I (RDOF I) support to price cap carriers and CETCs that were awarded the winning bid for eligible census blocks within price cap study areas.<sup>14</sup> Ten Kansas CETCs receive RDOF I support.

In 2020, the FCC created the 5G Fund for Rural America (5G Fund) to replace the Mobility Fund Phase II.<sup>15</sup> The FCC directed that \$9 billion from the FUSF be used for the new 5G Fund to expand fifth generation wireless broadband connectivity for a 10-year period. CETCs receiving legacy high-cost support for mobile wireless services are required to use an increased percentage of their legacy support toward the deployment, maintenance, and operation of voice and broadband networks that support 5G and meet baseline performance for minimum data speed, maximum latency, and minimum monthly data allowance (equal to average U.S. subscriber data usage). The FCC reinstated the remaining two-year phase-down of legacy frozen high-cost support for non-wireless CETCs.

On March 11, 2025, the Commission opened this Docket and directed all ETCs to file their annual ETC Certifications in the docket by June 30, 2025, to allow the Commission to determine whether

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<sup>11</sup> In the Matter of Connect America Fund, WC Docket 10-90, Report and Order and Further notice of Proposed Rulemaking, Rel. May 26, 2016.

<sup>12</sup> In the Matter of Connect America Fund ETC Annual Reports and Certifications, WC Docket No. 10-90, 14-58, Report and Order, Rel. July 7, 2017.

<sup>13</sup> Amended Order Opening Docket, Docket No. 18-GIMT-394-GIT, Apr. 17, 2018.

<sup>14</sup> Some high-cost ETCs designated as such for RDOF I support; have not been authorized to receive such support and, therefore are not required to be certified this year as funding has not been disbursed. Public Notice, p. 3, AU Docket No. 20-34, Rel. July 21, 2021.

<sup>15</sup> In the Matter of Establishing a 5G Fund for Rural America, Report and Order, GN Docket No. 20-32, Rel. Oct. 20, 2020.

it should certify that the ETC used all high-cost FUSF support in 2024 and will use all FUSF support in 2026 in compliance with Section 254(e).

## **ANALYSIS**

### **I. Certification**

Lifeline-only ETCs do not receive high-cost USF support and are only required to submit Attachment 5 to certify the ETC is in compliance with its Quality of Service and Consumer Protection Standards. A Lifeline-only ETC must also certify that its Lifeline service plan is comparable to that of the ILEC.

The Commission is required, pursuant to 47 C.F.R. § 54.314(a), to certify all FUSF high-cost support provided to ETCs was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Therefore, all ETCs receiving high-cost FUSF support must certify the use of all their FUSF support for USF certification purposes.<sup>16</sup>

Effective December 2021, AT&T Kansas and Brightspeed completed their CACM obligations and ceased receiving CACM support. Thus, neither AT&T Kansas nor Brightspeed receive FUSF high-cost support and no longer need to certify FUSF support receipts. Additionally, December 2021 was also the completion of the two-year phase-out of frozen high-cost legacy support for CETCs. H&B Cable Service, Inc. (H&B), S&T Communications, LLC (S&T Comm); and IdeaTek Telcom, LLC no longer receive CACM support and no longer need to certify these FUSF receipts.

All ETCs filed their required USF Certification Forms, albeit fourteen ETCs filed after the due date. Staff followed-up with several carriers regarding missing filings and/or missing or incorrect information, as addressed later in this R&R.

Staff reviewed each ETC's Attachment 1 Certification Form to ensure that the Form identified the FUSF support being certified and that the ETC certified its use of its USF support received in 2024 and that it would use support received in 2026 as intended. Staff also verified that each ETC receiving KUSF support certified its use of the support.

### **II. Validation of Prior Calendar Year's USF Support Certification**

The USF Certification Forms require an ETC to provide the amount of FUSF and/or KUSF support spent on new investments and the expenses associated with providing universal service (USF expenditures) during the prior year. To determine if an ETC appropriately spent its FUSF support, Staff compared an ETC's USF expenditures to its FUSF receipts. Staff then compared the ETC's USF expenditures to the ETC's combined FUSF and KUSF support for the preceding year (2024). These comparisons serve as an initial test to determine whether FUSF and KUSF funds were expended appropriately

Staff recognizes that USF investments and expenditures for telecommunications infrastructure varies from year to year and that an ETC may have made significant USF expenditures in prior

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<sup>16</sup> Order Opening Docket; Requiring Compliance Filings, Docket No. 25-GIMT-332-GIT, March 11, 2025.

years. For the RLECs, if the initial USF test indicates an RLEC may not have used its USF support appropriately, Staff analyzes the RLEC's most recent five-year period (2020 – 2024) investments, expenses, and combined FUSF and KUSF support to determine whether the RLEC appropriately used its combined FUSF and KUSF support over the five-year period.

Staff's analysis for A-CAM recipients recognizes a portion of RLEC's A-CAM support. In comparison, A-CAM recipients previously reported an allocated percentage of their A-CAM support for USF Certification purposes prior to 2020. For 2021 and forward, Staff used ETC provided intrastate allocation of FUSF support. In the event where ETCs did not provide the intrastate allocation of FUSF, Staff used a 35% allocation factor. The 35% allocation was determined using the average A-CAM allocation provided in two most recent Commission Orders issued for an application for initial KUSF Support, and an application for Additional KUSF Support<sup>17</sup>. Staff is open to a revised allocation factor if ETC provides support for a different allocation.

When the five-year analysis indicates an RLEC may not have appropriately expended its combined FUSF and KUSF receipts, Staff inputs the pertinent data from the RLEC's Annual Report for the 2024 calendar year (2024 Annual Report) into the accounting schedules Staff utilizes in a KUSF audit. To gain a better understanding of what the audit results may be, Staff incorporates adjustments to reflect the RLEC's current March 2025 – February 2026 Fiscal Year 29/ (FY 29) KUSF support and, for an RLEC receiving legacy FUSF support, Staff reflects the amount the RLEC is estimated to receive in 2025.<sup>18</sup> This analysis is not as detailed or in-depth as the review that occurs in a KUSF audit, however, it provides Staff with a general idea of what the results of an audit might be.

If the audit schedule analysis indicates an audit may be appropriate, Staff contacts the RLEC to discuss whether it anticipates any changes in its expenditures or operations that would affect the result of a KUSF audit. If, after having discussions with the carrier, Staff still believes an audit is appropriate, Staff recommends the Commission consider an audit of the RLEC. This approach allows the RLEC an opportunity to present company-specific information to the Commission. Staff is not recommending any RLEC be subject to an audit this year.

## **A. Federal USF Certification**

### **1. Competitive ETCs**

Staff's analysis of the CETCs' data revealed that Cox Kansas Telecom, LLC. (Cox); LR Communications, Inc. (LR); Mercury Wireless, (Mercury); Plains Internet, LLC (Plains), and Twin Valley Communications received more FUSF support in 2024 than they spent. LR and Plains are RDOF I recipients, Twin Valley received CAF Phase II support, and Mercury receives CAF Phase II (CAF II) and RDOF I support. Although these CETCs failed their annual FUSF Certification test, each must meet the FCC's deployment obligations for the FUSF support program for which it receives FUSF support. Each CETC filed an attestation that it used and will

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<sup>17</sup> Docket No. 25-MRGT-222-KSF, March 27, 2025, and Docket No. 24-TTHT-343-KSF, February 22, 2024. Direct Testimony of Roxie McCullar on Behalf of KCC.

<sup>18</sup> USAC High Cost Funding Disbursement Search Tool, <https://opendata.usac.org/High-Cost/High-Cost-Funding-Disbursement-Search/cegz-dzzi>, last viewed Sept. 7, 2025.

use all FUSF support for which the support is intended. Additionally, each must file certifications with the FCC and USAC. Staff will continue to monitor each CETC's annual USF Certification and recommends the Commission certify all CETCs for FUSF purposes.

## **2. ILEC ETCs**

The following RLECs' FUSF support exceeded their total cash USF expenditures:

Rural Telephone Service Company, Inc. (Rural)  
Tri-County Telephone Association, Inc. (Tri-County)  
United Telephone Association, Inc. (United Telephone)  
Wamego Telecommunications Company, Inc. (Wamego)

### **B. KUSF Certification**

The KUSF analysis is only applicable to the ROR-regulated RLECs since their annual KUSF support is based on company-specific costs. The KUSF support analysis compares an RLEC's combined FUSF and KUSF support receipts to its annual USF expenditures. The following RLEC's did not pass this analysis:

Cunningham Telephone Company (Cunningham)  
Golden Belt Telephone Association (Golden Belt)  
H&B Communications, Inc. (H&B)  
KanOkla Telephone Association, Inc (KanOkla)  
Rural Telephone Service Co., Inc. (Rural)  
South Central Telephone Coop Association (South Central)  
Tri-County Telephone Association, Inc. (Tri-County)  
Twin Valley Telephone, Inc. (Twin Valley)  
United Telephone Association (United)  
Wamego Telecommunications Company, Inc. (Wamego)  
Wilson Telephone Company, Inc. (Wilson)

These RLECs did not pass the USF Certification tests, thus, Staff performed the five-year analysis, shown in Exhibit 2, and when an RLEC failed the five-year analysis, Staff performed its audit schedule analysis. The results of Staff's analyses are as follows.

#### **Cunningham:**

Cunningham's 2024 combined Federal and Kansas USF support exceeded its 2024 USF expenditures by [REDACTED]. For 2020 - 2024, Cunningham's combined USF expenditures exceeded its USF support by approximately [REDACTED]. On October 11, 2024, Cunningham filed an application with the Commission to increase its annual KUSF support<sup>19</sup>. On April 3, 2025, the Commission issued an Order approving Cunningham's annual KUSF support increase by \$714,504, therefore, Staff does not recommend any further audit of Cunningham.

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<sup>19</sup> Docket No. 25-CNHT-185-KSF: In the Matter of the Application and Request of Cunningham Telephone Co., Inc. for an Increase in its Cost-Based Kansas Universal Service Fund Support.

### **Golden Belt:**

Golden Belt's 2024 combined Federal and Kansas USF support exceeded its 2024 USF expenditures by [REDACTED]. This is the first time in five years that Golden Belt's support exceeded expenditures. For 2020 - 2024, Golden Belt's combined USF expenditures exceeded its USF support by approximately [REDACTED]. Thus, Staff is satisfied that Golden Belt has used its KUSF and FUSF support appropriately.

### **H&B:**

H&B's 2024 combined Federal and Kansas USF support exceeded its 2024 USF expenditures by [REDACTED]. For 2020 - 2024, H&B's combined USF support exceeded its USF expenditures by approximately [REDACTED], with the Company's USF support exceeding expenditures each year.

Staff incorporated H&B's 2024 Annual Report data into the audit schedules. Staff also input H&B's KUSF FY 29 support of [REDACTED], which is a reduction of approximately [REDACTED] from its KUSF FY 28 (March 2024 - February 2025) support. This analysis indicates an audit of H&B may not be appropriate. Thus, Staff is not recommending an audit and will continue to monitor the Company's annual USF Certification and advise the Commission accordingly.

### **KanOkla:**

For 2024, KanOkla's combined FUSF and KUSF support exceeded its 2024 USF expenditures by [REDACTED]. For 2020 - 2024, KanOkla's combined Federal and Kansas USF support exceeded its USF expenditures by approximately [REDACTED], with the Company's USF support exceeding its USF expenditures each year of the five-year period.

Staff incorporated KanOkla's 2024 Annual Report data into its audit schedules and adjusted its results to recognize KanOkla's KUSF FY 29 support of \$545,457, which is approximately \$28,094 less than its KUSF FY 28 support. Staff also recognized that KanOkla's estimated 2025 FUSF support will be about \$602,960 less than its 2024 FUSF support. Staff's results indicate an audit of KanOkla is not appropriate. Staff will continue to monitor the Company's annual USF Certification and advise the Commission if it believes an audit is appropriate.

### **Rural:**

For 2024, Rural's combined FUSF and KUSF support exceeded its 2024 expenditures by [REDACTED]. When considering Rural's allocation of its A-CAM support to the intrastate jurisdiction for 2020-2024, the analysis showed the Company's combined USF support for 2020 - 2024 was [REDACTED] more than its USF expenditures.

Staff incorporated Rural's 2024 Annual Report data into its KUSF audit schedules to determine if an audit of Rural would be appropriate. Staff also recognized that Rural will receive \$2,094,863 KUSF FY 29 support, a reduction of \$110,650 compared to its KUSF FY 28 support. This analysis indicates an audit of Rural may not be appropriate at this time. Staff will continue to monitor the Company's USF Certification and advise the Commission if an audit should be conducted.

### **South Central**

For 2024, South Central's combined FUSF and KUSF support exceeded its 2024 USF expenditures by [REDACTED]. For 2020 – 2024, South Central's combined USF support exceeded its USF expenditures by about [REDACTED]. Staff incorporated South Central's 2024 Annual Report data into its audit schedules and recognized that South Central's 2025 FUSF support is \$571,484 less than 2024 FUSF support. Based on this analysis, Staff is not recommending an audit for South Central.

### **Tri-County's Council Grove and Tri-County Study Areas:**

Tri-County and Council Grove merged on January 1, 2008, with Tri-County being the surviving entity. In 2011, the Commission cancelled Council Grove's Certificates of Convenience.<sup>20</sup> At that time, Tri-County stated that it intended to merge the two study areas after completing certain construction and installation projects to provide fiber-to-the-home to its customers, however, the study areas have not been combined. As a result, the Tri-County and Council Grove study areas are operated separately for FUSF reporting purposes, with each study area receiving legacy FUSF support. Each study area also receives its own KUSF support. For USF certification purposes, Tri-County submits a separate USF Certification for each study area.

For 2024, the Council Grove study area's combined USF expenditures exceeded its USF support by [REDACTED] and, for 2020 - 2024, the combined USF support exceeded USF expenditures by about [REDACTED]. For the Tri-County study area, the 2024 combined FUSF and KUSF support exceeded 2024 USF expenditures by [REDACTED] and for 2020 - 2024, the Tri-County study area's FUSF and KUSF support exceeded USF expenditures by about [REDACTED]. USF receipts exceeded USF expenditures each of the five years for Tri-County.

Both study areas are legally one entity, therefore, Tri-County files one Annual Report that includes the operating results of both study areas. Staff incorporated the 2024 Annual Report data into its audit schedules and recognized changes to each study area's KUSF and FUSF support. The Council Grove study area's KUSF FY 29 support of \$766,315 is about \$39,766 less than its KUSF FY 28 support and Tri-County study area's KUSF FY 29 support of \$1,048,250 is about \$55,000 less than its KUSF FY 28 support. The Council Grove and Tri-County study areas' 2025 FUSF support is also estimated to decline approximately \$234,000 and \$499,000, respectively, when compared to the 2024 FUSF support. This analysis indicates an audit of Tri-County is not appropriate at this time, with costs likely to exceed any benefits. Staff will continue to monitor Tri-County's annual ETC Certification and advise the Commission if the situation changes.

### **Twin Valley:**

For 2024, Twin Valley's combined Federal and Kansas USF support exceeded its 2024 expenditures by [REDACTED]. For 2020 - 2024, Twin Valley's combined FUSF & KUSF

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<sup>20</sup> Order Cancelling Council Grove Telephone Company's Certificates of Convenience and Order Amending Tri-County Telephone Association, Inc.'s Certificated Area to Include the Council Grove Exchange, Docket Nos. 11-CGTT-370-CCS and 11-TRCT-371-COC, April 28, 2011.

support exceeded its USF expenditures by [REDACTED], with USF support exceeding expenditures each year for 2020 -2024.

Staff incorporated Twin Valley's 2024 Annual Report data into its audit schedules. Staff also incorporated Twin Valley's \$2,783,311 of KUSF FY 29 support to recognize a \$137,457 reduction from its annual KUSF FY 28 support. Staff is not recommending an audit of the Company and will continue to monitor the Company's USF Certification and advise the Commission if an audit should be conducted.

#### **United Telephone:**

For 2024, United's combined Federal and Kansas USF support exceeded its USF expenditures by [REDACTED]. United Telephone's 2020 - 2024 combined USF expenditures exceeded USF support by [REDACTED].

Staff incorporated United's 2024 Annual Report data into its audit schedules. Staff also recognized that United's KUSF FY 29 support of \$1,240,881 is \$94,122 less than its KUSF FY28 support. United's 2025 FUSF is about \$1.46 million less than 2024. This analysis revealed that a KUSF audit of United Telephone may not be appropriate. Staff is not recommending an audit of the Company and will continue to monitor the Company's USF Certification and advise the Commission if an audit should be conducted.

#### **Wamego:**

For 2024, Wamego's combined Federal and Kansas USF support exceeded its USF expenditures by [REDACTED]. Wamego's 2020-2024 combined USF support exceeded its expenditures by [REDACTED], with its USF support exceeding expenditures each year.

Staff incorporated Wamego's 2024 Annual Report data into its audit schedules. Staff also recognized that Wamego's KUSF FY 29 support of \$1,269,753 is about \$63,029 less than its KUSF FY287 support. This analysis revealed that a KUSF audit of Wamego may not be appropriate. Staff is not recommending an audit of the Company and will continue to monitor the Company's USF Certification and advise the Commission if an audit should be conducted.

#### **Wilson:**

For 2024, Wilson's combined Federal and Kansas USF support exceeded its USF expenditures by [REDACTED]. Wilson's 2020 - 2024 combined USF support exceeded its expenditures by [REDACTED], with its USF support exceeding expenditures each year except 2022. Staff incorporated Wamego's 2024 Annual Report data into its audit schedules and also recognized that Wilson's KUSF FY 29 support of 581,280 is about \$29,259 less than its KUSF FY28. This analysis revealed that a KUSF audit of Wilson is not necessary. Staff is not recommending an audit of the Company and will continue to monitor the Company's USF Certification and advise the Commission if an audit should be conducted.

### III. Additional ETC Reporting Requirements

As stated previously, the Commission adopted additional reporting requirements for ETCs in 2006, which are reported on Attachment 5 of the USF Certification Forms. All ETCs satisfied the additional ETC reporting requirements.

#### Late Filings

Exhibit 1 to this R&R provides a list of the ETCs that Staff recommends the Commission certify and the date the ETC filed its complete submission.<sup>21</sup> Fourteen carriers filed their USF Certifications after the June 30, 2025, due date, however, Staff is only recommending penalties for six of the companies, as indicated in Table 1 below:

**Table 1**

<b>ETC</b>	<b>Date Filed</b>	<b>Weeks Late</b>	<b>Recommended Penalty</b>
AMG Technology Investment Group, LLC (AMG)	7/1/2025	1-day	\$0
Assurance Wireless USA, LP (Assurance)	7/1/2025	1-day	\$0
Consolidated Communications of KS & MO (Consolidated)	7/3/2025	3-days	\$0
Global Connect	7/3/2025	3-days	\$0
IdeaTek Telecom, LLC (IdeaTek)	7/1/2025	1-day	\$0
i-Wireless, LLC. (iWireless)	7/15/2025	2	\$200
Mercury Wireless (Mercury)	8/15/2025	6	\$600
Mo-Kan Dial, Inc. (Mo-Kan)	7/1/2025	1-day	\$0
NE Colorado Cellular, Inc (NE Colorado)	7/1/2025	1-day	\$0
Plains Internet, LLC (Plains Internet)	8/25/2025	8	\$1,600
Skybeam, LLC (Skybeam)	7/18/2025	3	\$300
Sage Telecom Communications, LLC (Sage)	7/28/2025	4	\$400
Tempo Telecom, LLC (Tempo)	7/2/2025	2-days	\$0
Yourtel America, Inc. (Yourtel)	7/28/2025	4	\$800

Staff decided to not assess any penalty to those late filing ETCs that filed within 3 days beyond the due date of June 30, 2025. AMG, Assurance, Consolidated, Global Connect, IdeaTek, Mo-Kan, NE Colorado, and Tempo filed late but were within 3-days beyond the due date, thus Staff

<sup>21</sup> Assurance Wireless USA, LP; Boomerang Wireless; Global Connection Inc. of America d/b/a Stand Up Wireless; i-Wireless, LLC; Midcontinent Communications; Q-Link Wireless; Sage Telecom Communications, LLC; Telrite d/b/a Life Wireless; Tempo Telecom, LLC; TracFone Wireless, Inc.; and YourTel America, Inc. are not federal high-cost ETCs and, therefore, are not listed on Exhibit 1.

recommends not to assess any penalty. For those ETCs that filed Certification Forms three days after the June 30, 2025, due date, Staff continues to recommend a standard penalty of \$200 per week,<sup>22</sup> but recommends that some penalties be modified to suit the specific circumstances for each situation, as further explained below.

1. I-Wireless filed its Lifeline-only ETC Certification Forms two weeks after the due date. Staff recommends a \$100 per week penalty, or a total penalty of \$200 to i-Wireless.
2. Mercury Wireless filed its ETC certification Forms on August 15, 2025, after Staff followed up with the Company. Staff recommends a \$100 per week penalty, or a total penalty of \$600 to Mercury Wireless.
3. Skybeam was three weeks late in filing the Certification Forms. Staff recommends a \$100 per week penalty, or a total penalty of \$300 to Skybeam.
4. Plains Internet filed its ETC certification on August 25, 2025, after Staff followed up with the Company. This is the third time Plains Internet's annual ETC certification filing has been late. Staff recommends a penalty of \$200 per week (repeat offender), or a total penalty of \$1,600 to Plains Internet.
5. Sage Telecom filed its ETC Certification Forms four weeks after the due date. Staff recommends a \$100 per week penalty, or a total penalty of \$400.
6. Yourtel filed the ETC certification Forms four weeks after the due date. Staff reviewed Yourtel's five prior annual ETC certifications and found that this is the fifth time in the six-year period Yourtel filed its USF Certification Forms after the due date. Therefore, Staff recommends the Commission a penalty of \$200 per week (repeat offender), for a total of \$800.

Staff appreciates that the majority of the ETCs filed their information before the ordered due date and, when requested, filed the requested information in a timely manner.

#### **Incorrect or Incomplete Data**

Similar to past years, Staff needed to follow-up with a few ETCs that did not identify the specific FUSF support they receive and need to certify. Staff also needed to follow-up with a few ETCs regarding incomplete Attachments or incorrect information. Staff notes, however, that it needed to follow-up with fewer companies this year.

#### **IV. A-CAM Support Allocation Issues**

The FCC's newer high-cost support mechanisms – CACM, CACM, CAF II, A-CAM, Revised A-CAM, A-CAM II, Enhanced A-CAM, CAF Broadband Loop Support, and RDOF I – are based on cost models and not carrier-specific costs. Each of these new support mechanisms replaces legacy high-cost loop support and supports the local exchange network and voice and broadband services.

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<sup>22</sup> Notice of Filing Staff's Report and Recommendations (Confidential and Redacted), Sept. 16, 2019, Docket No. 19-GIMT-399-GIT; and Notice of Filing Staff's Report and Recommendations (Confidential and Public), Sept. 10, 2020, Docket No. 20-GIMT-415-GIT.

All Federal high-cost USF have certified 100% of their FUSF support for USF Certification purposes, including all A-CAM recipients since 2020. Staff's analysis of whether to recommend an RLEC that receives A-CAM support is affected by the amount of A-CAM support used in the analysis. Thus, any future change in the determination of a methodology to recognize A-CAM support for KUSF purposes will require Staff to incorporate the methodology in its analysis during the USF Certification process.

## **RECOMMENDATIONS**

Staff recommends the Commission submit letters to the FCC and the USAC on or before October 1, 2025, to certify that all high-cost FUSF support provided to the ETCs identified in Exhibit 1 was used in the preceding calendar year (2024) and will be used in the coming calendar year (2026) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Staff also recommends the Commission assess the following penalties for late filings to i-Wireless, LLC - \$200, Mercury Wireless - \$600, Plains Internet Service - \$1,600, Sage Telecom Communications, LLC - \$400, Skybeam, LLC - \$300, and Yourtel America, Inc. - \$800.

**Certification for the Use of Federal USF Support****Docket No. 25-GIMT-332-GIT****ETCs in Kansas**

<b>Company Name</b>	<b>Study Area no.</b>	<b>Date Received</b>
Blue Valley Tele-Communications	411746	6/27/2025
Brightspeed Kansas ILECS (Formerly United Telephone /CenturyLink	411842, 411957, 411317	6/27/2025
Columbus Communications f/k/a Columbus Telephone Company	411756	6/26/2025
Consolidated Communications of KS f/k/a Bluestem & Sunflower	411835	7/3/2025
Consolidated Communications of MO f/k/a FairPoint Communications	421472	7/3/2025
CrawKan Telephone Cooperative, Inc.	411818	6/26/2025
Cunningham Telephone Co. Inc.	411761	6/26/2025
Elkhart Telephone Co. Inc.	411764	6/30/2025
Golden Belt Telephone Association, Inc.	411777	6/27/2025
Gorham Telephone Co.	411778	6/27/2025
H & B Communications	411781	6/27/2025
Haviland Telephone Company, Inc.	411780	6/20/2025
Home Telephone Co. Inc.	411782	6/26/2025
JBN Telephone Co. Inc.	411785	6/19/2025
KanOkla Telephone Assn. Inc.	411788	6/26/2025
LaHarpe Telephone Co.	411791	6/30/2025
Madison Telephone, LLC	411801	6/26/2025
MoKan Dial, Inc.	411807	7/1/2025
Moundridge Telephone Co.	411808	6/30/2025
Mutual Telephone Co.	411809	6/27/2025
Peoples Telecommunications, LLC	411814	6/24/2025
Pioneer Telephone Assn. Inc.	411817	6/26/2025
Rainbow Telephone Co-op Assn. Inc.	411820	6/24/2025
Rural Telephone Service Co., Inc.	411826	6/30/2025
S & A Telephone Co., Inc.	411829	6/30/2025
S & T Telephone Coop Assn.	411827	6/24/2025
South Central Telephone Assn. Co.	411831	6/24/2025
Southern Kansas Telephone Company, Inc.	411833	6/27/2025
Southwestern Bell Telephone Company	415214	6/28/2025
Totah Communications, Inc.	412030	6/30/2025
Tri-County Telephone Assn. Inc.	411839	6/26/2025
Tri-County - Council Grove	411758	6/26/2025
Twin Valley Telephone, Inc.	411840	6/27/2025
United Telephone Assn., Inc.	411841	6/26/2025
UTC of Kansas - CenturyLink	411842	6/26/2025
Embarq MO - CenturyLink fka UTC-MO dba UTC SE KS	411957	6/26/2025
United Telephone Co. of Eastern Kansas - CenturyLink	411317	6/26/2025
Wamego Telecommunications Co., Inc.	411845	6/26/2025
Wheat State Telephone, Inc.	411847	6/26/2025
Wilson Telephone Co., Inc.	411849	6/26/2025
Zenda Telephone Co.	411852	6/27/2025
AMG Technologies	419044	7/1/2025
Cox Kansas Telcom	419021	6/30/2025
H & B Cable Service	419008	6/26/2025
Home Communications	419051	6/26/2025
Wildflower Telecommunications LLC - IdeaTek Telecom	419016	7/1/2025
IdeaTek Telecom (CAF/RDOF)	419043	7/1/2025
LR Communications	419038	6/27/2025
Mercury Wireless Kansas, LLC	419045	8/21/2025
Nex Tech, LLC	419007	6/30/2025
Nex Tech Wireless	419010	6/6/2025
NE Colorado Cellular d/b/a Viera	419020	7/1/2025
Plains Internet, LLC	419049	8/25/2025
Resound Networks, LLC	419052	6/30/2025
S&T Communications	419023	6/30/2025
SkyBeam, LLC	416118	7/18/2025
Twin Valley Communications, Inc.	419046	6/27/2025
United Wireless Communications	419011	6/26/2025
USCOC of NE d/b/a US Cellular	419012	6/30/2025
WestLink Communications, LLC	419015	6/26/2025
Wisper ISP	419047	6/30/2025
WTC Communications, Inc.	419050	6/26/2025

**Public****ANALYSIS OF TOTAL CASH EXPENDITURES vs USF SUPPORT FOR USF CERTIFICATION**

Total Cash Expenditures Combined USF Support				Total Cash Expenditures Combined USF Support			
Year		Attachment 2a	Attachment 2a	Year		Attachment 2a	Attachment 2a
		**Denotes CONFIDENTIAL**	PUBLIC DATA [b]			**Denotes CONFIDENTIAL**	PUBLIC DATA [b]
<b>Cunningham (Legacy USF)</b>	<b>CNHT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>	<b>Golden Belt (Legacy USF)</b>	<b>GNBT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>
21-GIMT-354-GIT [a]	2020	*	\$ 2,219,148	21-GIMT-354-GIT [a]	2020	*	\$ 4,459,380
22-GIMT-455-GIT [a]	2021	*	\$ 1,998,491	22-GIMT-455-GIT [a]	2021	*	\$ 4,485,151
23-GIMT-644-GIT [a] [b]	2022	*	\$ 1,994,140	23-GIMT-644-GIT [a] [b]	2022	*	\$ 4,270,658
24-GIMT-612-GIT	2023	*	\$ 1,951,592	24-GIMT-612-GIT	2023	*	\$ 4,113,790
25-GIMT-332-GIT	2024	*	\$ 1,794,634	25-GIMT-332-GIT	2024	*	\$ 3,688,488
<b>TOTAL 2020-2024</b>	*	*	\$ 9,958,005	<b>TOTAL 2020-2024</b>	*	*	\$ 21,017,467
<b>2024 Support Exceeds Expenditures</b>				<b>2024 Support Exceeds Expenditures</b>			
<b>2020-2024 Support Exceeds Expenditures</b>			\$ 709,653	<b>2020-2024 Support Exceeds Expenditures</b>			\$ 7,941,430
<b>H&amp;B Comm. [A-CAM]</b>	<b>HBCT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>	<b>KanOkla [Legacy USF]</b>	<b>KOKT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>
21-GIMT-354-GIT [a]	2020	*	\$ 913,818	21-GIMT-354-GIT	2020	*	\$ 2,862,604
22-GIMT-455-GIT [a]	2021	*	\$ 921,650	22-GIMT-455-GIT	2021	*	\$ 2,753,237
23-GIMT-644-GIT [a] [b]	2022	*	\$ 915,659	23-GIMT-644-GIT	2022	*	\$ 2,259,631
24-GIMT-612-GIT	2023	*	\$ 895,245	24-GIMT-612-GIT	2023	*	\$ 1,940,526
25-GIMT-332-GIT	2024	*	\$ 637,717	25-GIMT-332-GIT	2024	*	\$ 1,685,605
<b>TOTAL 2020-2024</b>	*	*	\$ 4,284,089	<b>TOTAL 2020-2024</b>	*	*	\$ 11,501,603
<b>2024 Support Exceeds Expenditures</b>				<b>2024 Support Exceeds Expenditures</b>			
<b>2020-2024 Support Exceeds Expenditures</b>			\$ (1,813,384)	<b>2020-2024 Support Exceeds Expenditures</b>			\$ (3,857,043)
<b>Rural [A-CAM] - ROR Analysis</b>	<b>RRLT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>	<b>South Central (Legacy USF)</b>	<b>SCNT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>
21-GIMT-354-GIT [a]	2020	*	\$ 3,134,583	21-GIMT-354-GIT [a]	2020	*	\$ 1,696,950
22-GIMT-455-GIT	2021	*	\$ 6,432,331	22-GIMT-455-GIT	2021	*	\$ 2,394,480
23-GIMT-644-GIT	2022	*	\$ 6,242,414	23-GIMT-644-GIT	2022	*	\$ 1,587,320
24-GIMT-612-GIT	2023	*	\$ 6,156,374	24-GIMT-612-GIT	2023	*	\$ 1,430,102
25-GIMT-332-GIT [b]	2024	*	\$ 6,162,545	25-GIMT-332-GIT	2024	*	\$ 2,416,962
<b>TOTAL 2020-2024</b>	*	*	\$ 28,128,247	<b>TOTAL 2020-2024</b>	*	*	\$ 9,525,814
<b>2024 Support Exceeds Expenditures</b>				<b>2024 Support Exceeds Expenditures</b>			
<b>2020-2024 Support Exceeds Expenditures</b>			\$ (258,103)	<b>2020-2024 Support Exceeds Expenditures</b>			\$ 10,682,081
<b>Tri-County [Legacy USF]</b>	<b>TRCT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>	<b>Twin Valley [A-CAM]</b>	<b>CGTT</b>	<b>USF Expenditures</b>	<b>USF Receipts</b>
21-GIMT-354-GIT	2020	*	\$ 4,331,534	21-GIMT-354-GIT	2020	*	\$ 5,025,945
22-GIMT-455-GIT	2021	*	\$ 3,957,821	22-GIMT-455-GIT	2021	*	\$ 4,459,467
23-GIMT-644-GIT	2022	*	\$ 3,922,584	23-GIMT-644-GIT	2022	*	\$ 4,092,564
24-GIMT-612-GIT	2023	*	\$ 3,594,652	24-GIMT-612-GIT	2023	*	\$ 5,645,624
25-GIMT-332-GIT	2024	*	\$ 3,186,626	25-GIMT-332-GIT	2024	*	\$ 3,287,682
<b>TOTAL 2020-2024</b>	*	*	\$ 18,993,217	<b>TOTAL 2020-2024</b>	*	*	\$ 22,511,282
<b>2024 Support Exceeds Expenditures</b>				<b>2024 Support Exceeds Expenditures</b>			
<b>2020-2024 Support Exceeds Expenditures</b>			\$ (5,871,592)	<b>2020-2024 Support Exceeds Expenditures</b>			\$ (4,863,486)

Public

ANALYSIS OF TOTAL CASH EXPENDITURES vs USF SUPPORT FOR USF CERTIFICATION														
Total Cash Expenditures Year Attachment 2a **Denotes CONFIDENTIAL** PUBLIC DATA [b]					Total Cash Expenditures Year Attachment 2a **Denotes CONFIDENTIAL** PUBLIC DATA [b]									
United Telephone Association		UTAT	USF Expenditures		USF Receipts		Wamego [Legacy USF]		WTCT	USF Expenditures		USF Receipts		
21-GIMT-354-GIT	2020	*		*	\$	3,780,787	*	21-GIMT-354-GIT	2020	*		*	\$	2,567,000
22-GIMT-455-GIT	2021	*		*	\$	4,075,139		22-GIMT-455-GIT	2021	*		*	\$	2,390,537
23-GIMT-644-GIT [a] [b]	2022	*		*	\$	4,253,261		23-GIMT-644-GIT	2022	*		*	\$	2,165,581
24-GIMT-612-GIT	2023				\$	4,518,057		24-GIMT-612-GIT	2023				\$	1,953,225
25-GIMT-332-GIT	2024				\$	4,403,044		25-GIMT-332-GIT [b]	2024				\$	3,732,877
TOTAL 2020-2024		*		*	\$	21,030,288		TOTAL 2020-2024		*		*	\$	12,809,220
2024 Support Exceeds Expenditures								2024 Support Exceeds Expenditures						
2020-2024 Support Exceeds Expenditures					\$	21,607,375		2020-2024 Support Exceeds Expenditures					\$	(3,726,398)
Wilson		WLST	USF Expenditures		USF Receipts									
21-GIMT-354-GIT [a]	2020	*		*	\$	2,029,543								
22-GIMT-455-GIT [a]	2021	*		*	\$	1,848,821								
23-GIMT-644-GIT [a]	2022	*		*	\$	1,595,051								
24-GIMT-612-GIT	2023				\$	1,548,251								
25-GIMT-332-GIT	2024				\$	1,411,115								
TOTAL 2020-2024		*		*	\$	8,432,781								
2024 Support Exceeds Expenditures														
2020-2024 Support Exceeds Expenditures					\$	(260,825)								
Notes:														
[a] Denotes Company received A-CAM support.														
[b] Staff's analysis includes Legacy USF, Safety Valve Support, and 35% of a recipient's A-CAM support.														

## **CERTIFICATE OF SERVICE**

25-GIMT-332-GIT

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's R&R was served via electronic service this 17th day of September, 2025, to the following:

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## **CERTIFICATE OF SERVICE**

25-GIMT-332-GIT

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25-GIMT-332-GIT

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