

STATE OF KANSAS



CORPORATION COMMISSION
UTILITIES DIVISION
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TOPEKA, KS 66604-4027

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GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | PAT APPLE, COMMISSIONER

March 13, 2018

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Universal Service Administrative Company
Vice President, High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: CC Docket No. 96-45/WC Docket No. 10-90, Annual State Certification of Support for
Eligible Telecommunications Carriers Pursuant to 47 C.F.R. § 54.314

Pursuant to the requirements of 47 C.F.R. § 54.314, the Kansas Corporation Commission (KCC) submitted to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) on September 26, 2017, that the telecommunications carriers included in Exhibit 1 to its letter are eligible to receive federal high-cost support for the program years cited.

The KCC's September 26, 2017, letter and Exhibit 1 did not include WestLink Communications, LLC and the associated Study Area Code (SAC) 419015. As explained in the enclosed Order, it was KCC staff's understanding that United Wireless Communications, as WestLink's successor-in-interest, would receive the federal high-cost support associated with SAC 419015 without being listed in the KCC's certification. However, following recent discussions with the USAC, it is now understood that certification must be received for SAC 419015 in order for United Wireless to receive the associated federal high-cost support for SAC 419015.

Therefore, pursuant to the requirements of 47 C.F.R. § 54.314, the KCC certifies for the carriers listed in Exhibit 2 all federal high-cost support provided to such carriers within Kansas was used in 2016 and will be used in 2018 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

If you have any questions or concerns, please contact Christine Aarnes at 785-271-3132 or c.aarnes@kcc.ks.gov.

Yours Truly,

A handwritten signature in blue ink, reading "Shari Feist Albrecht". The signature is written in a cursive, flowing style.

Shari Feist Albrecht, Chair
Kansas Corporation Commission

cc: KCC Docket No. 17-GIMT-405-GIT

**Certification for the Use of Federal USF Support
ETCs in Kansas**

Company Name	Study Area no.	Date Received	Comments
Blue Valley Tele-Communications	411746	6/26/2017	Part of Sunflower Study Area
Bluestem Telephone Co.	See Sunflower	6/30/2017	
Columbus Telephone Company	411756	6/30/2017	
Council Grove Telephone Company	411758	6/23/2017	
CrawKan Telephone Cooperative, Inc.	411818	6/29/2017	
Cunningham Telephone Co. Inc.	411761	6/30/2017	
Elkhart Telephone Co. Inc.	411764	6/30/2017	
FairPoint Communications Missouri, Inc.	421472	6/30/2017	
Golden Belt Telephone Assn. Inc.	411777	6/21/2017	
Gorham Telephone Co.	411778	6/30/2017	
H & B Communications	411781	6/30/2017	
Haviland Telephone Co.	411780	6/27/2017	
Home Telephone Co. Inc.	411782	6/30/2017	
JBN Telephone Co. Inc.	411785	6/29/2017	
KanOkla Telephone Assn. Inc.	411788	6/27/2017	
LaHarpe Telephone Co.	411791	6/30/2017	
Madison Telephone, LLC	411801	6/22/2017	
MoKan Dial, Inc.	411807	7/3/2017	
Moundridge Telephone Co.	411808	6/30/2017	
Mutual Telephone Co.	411809	7/3/2017	
Peoples Telecommunications, LLC	411814	6/26/2017	
Pioneer Telephone Assn. Inc.	411817	6/29/2017	
Rainbow Telephone Co-op Assn. Inc.	411820	6/27/2017	
Rural Telephone Service Co., Inc.	411826	6/30/2017	
S & A Telephone Co., Inc.	411829	6/22/2017	
S & T Telephone Coop Assn.	411827	6/27/2017	
South Central Telephone Assn. Co.	411831	6/26/2017	
Southern Kansas Telephone Co.	411833	6/26/2017	
Southwestern Bell Telephone Company	415214	6/30/2017	
Sunflower Telephone Co.	411835	6/30/2017	
Totah Telephone Co. Inc.	412030	6/30/2017	
Tri-County Telephone Assn. Inc.	411839	6/23/2017	
Twin Valley Telephone, Inc.	411840	6/30/2017	
United Telephone Assn., Inc.	411841	6/30/2017	
CenturyLink fka UTC of Kansas	411842	6/26/2017	
CenturyLink fka UTC-MO dba UTC SE KS	411957	6/26/2017	
CenturyLink fka United Telephone Co. of Eastern Kansas	411317	6/26/2017	
Wamego Telecommunications Co., Inc.	411845	6/30/2017	
Wheat State Telephone, Inc.	411847	7/3/2017	
Wilson Telephone Co., Inc.	411849	6/30/2017	
Zenda Telephone Co.	411852	6/30/2017	
Big River Telephone Company	419018	6/29/2017	
Cellular Network Partnership d/b/a Pioneer	419014	7/3/2017	
City of Chanute	N/A	4/25/2017	
Epic Touch	419009	6/29/2017	
H & B Cable Service	419008	6/30/2017	
IdeaTek Telecom f/k/a Wildflower Telecommunications LLC	419016	6/30/2017	
LR Communications, LLC d/b/a Mutual TeleCommunications	419038	7/3/2017	
Nex Tech	419007	6/20/2017	
Nex Tech Wireless	419010	7/3/2017	
NE Colorado Cellular d/b/a Viaero	419020	7/3/2017	
S&T Communications	419023	6/27/2017	
SkyBeam	N/A	7/10/2017	
United Wireless Communications	419011	6/29/2017	
USCOC of NE/KS d/b/a US Cellular	419012	6/30/2017	
WestLink Communications LLC	419015	6/29/2017	

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the Matter of a Certification of Compliance)
with Section 254(e) of the Federal)
Telecommunications Act of 1996 and) Docket No. 17-GIMT-405-GIT
Certification of Appropriate Use of Kansas)
Universal Service Fund Support.)

ORDER DIRECTING SUBMISSION OF REVISED CERTIFICATION
LETTERS TO THE FCC AND USAC

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being duly advised in the premises, the Commission makes the following findings:

1. On March 28, 2017, the Commission issued an *Order Opening Docket* (Opening Order) in this docket for purposes of collecting data from certain telecommunications carriers in Kansas. The data was used to determine whether the Commission would certify to the Federal Communications Commission (FCC) that Eligible Telecommunications Carriers (ETCs) in Kansas are utilizing Federal Universal Service Fund (FUSF) funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The data is also used to determine whether ETCs in Kansas utilized their Kansas Universal Service Fund (KUSF) monies appropriately.

2. On September 21, 2017, the Commission issued an Order Directing Submission of Certification Letters to the FCC and USAC, finding that all Competitive ETCs (CETCs) and Incumbent Local Exchange Carriers (ILECs) timely filed the necessary forms as required by the Commission's March 28, 2017 Opening Order. Further, the Commission ordered the submission

of letters to the FCC and the Universal Service Administrative Company (USAC) on or before October 1, 2017, certifying that all federal high-cost support provided to the carriers listed by Commission Staff (Staff) 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.

3. Staff submitted a Report and Recommendation (R&R) to the Commissioners dated March 9, 2018, attached hereto and made a part hereof by reference. Staff states in its R&R that WestLink Communications, LLC (WestLink) was not included in the certification letter that was submitted to the FCC and the USAC on September 23, 2017, pursuant to the Commission's September 21, 2017 Order. As a result, the WestLink study area has not received FUSF support thus far in 2018.

4. Staff determined that United Wireless (UW), the successor in interest to Westlink, timely filed the necessary certifications and supporting documentation for all of its study area codes, including WestLink, in 2016 and 2017 and was entitled to receive FUSF support in 2018. Staff states that USAC requested the Commission submit a revised certification letter to the FCC and USAC, so that USAC can provide UW with the Westlink study area's FUSF support on a going-forward basis. USAC, Staff and the FCC will work to ensure that UW will be able to collect the FUSF support for the WestLink study area that it has not received thus far for 2018.

5. The Commission finds Staff's findings and recommendation to be reasonable and hereby adopts the same.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. Revised letters shall be submitted to the FCC and USAC certifying that the carriers listed in Exhibit 2 to Staff's Report and Recommendation have certified that their FUSF

support 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 for which the support is intended.

B. The parties have fifteen (15) days, plus three (3) days if service of this order is by mail, from the date this order was served in which to petition the Commission for reconsideration of any issue or issues decided herein. K.S.A. 66-118; K.S.A. 77-529(a)(1).

C. The Commission retains jurisdiction over the subject matter and parties for the purpose of issuing such further order, or orders, as it may deem necessary.

BY THE COMMISSION IT IS SO ORDERED.

Albrecht, Chair; Emler, Commissioner; Apple, Commissioner

Dated: 03/13/2018



Lynn M. Retz
Secretary to the Commission

AAL

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UTILITIES DIVISION
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GOVERNOR JEFF COLYER, M.D.
SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | PAT APPLE, COMMISSIONER

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Chairman Shari Feist Albrecht
Commissioner Jay Scott Emler
Commissioner Pat Apple

FROM: Christine Aarnes, Chief of Telecommunications
Sandy Reams, Assistant Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: March 9, 2018

SUBJECT: Docket No. 17-GIMT-405-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:

Section 254(e) of the Federal Telecommunications Act of 1996 provides that carriers receiving Federal Universal Service Fund (FUSF) support shall use the support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” States that desire eligible telecommunications carriers (ETCs) to receive federal support from the high-cost program must file an annual certification by October 1 with the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) stating that all FUSF high-cost support provided to such carriers within that state 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.¹

For reasons that will be explained further in this Report and Recommendation, the Commission did not include WestLink Communications, LLC (WestLink) in the certification letter that was submitted to the FCC and the USAC on September 23, 2017. As a result, the WestLink study area has not received FUSF high-cost support thus far in 2018. Staff recommends the Commission submit a new certification letter to the FCC and the USAC to certify that all federal high-cost support for Kansas provided to the carriers listed, including for the WestLink study area, was used in 2016 and will be used in 2018 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

¹ See 47 C.F.R. § 54.314.

BACKGROUND:

On January 17, 2006, in Docket No. 06-UWCC-243-ETC, the Commission issued an Order designating United Wireless (UW) an ETC for FUSF high-cost support purposes in specific exchanges and study areas in Kansas. On November 28, 2006, the Commission expanded UW's ETC designation to include one additional exchange. On August 1, 2007, the Commission issued an Order designating UW as an ETC in its entire service area for Kansas Universal Service Fund (KUSF) purposes. On June 2, 2009, in Docket No. 09-UWCC-328-ETC, the Commission issued an Order expanding UW's ETC designation to include two additional study areas.

On November 21, 2007, in Docket No. 07-WLCT-1439-ETC, the Commission issued an Order designating WestLink as an ETC in certain areas for FUSF high-cost support purposes. On November 23, 2010, in Docket No. 10-WLCT-565-ETC, the Commission issued an Order designating WestLink an ETC for KUSF purposes in specific exchanges and study areas in Kansas.

In August 2013, the FCC approved a proposal by UW to acquire WestLink and the transaction was finalized on August 9, 2013. UW informed the Commission of this transaction via a letter to the Commission's Executive Director dated August 26, 2013.

In 2014, UW and WestLink approached USAC about combining the companies' study area codes in order to streamline reporting responsibilities for UW and WestLink. USAC instructed UW and WestLink to seek certain findings from the Commission.² Specifically, USAC requested UW and WestLink to seek the following findings from the Commission:

- a) Find that UW is the successor-in-interest to WestLink and that UW has acquired WestLink's ETC designation;
- b) Find that UW should receive and be responsible for any federal universal service funds that WestLink would have received had it continued to operate as a stand-alone entity for that service area; and
- c) Find that UW provides continuous seamless service to the entirety of both companies' ETC designated areas through the acquisition.

Therefore, on July 21, 2014, UW and WestLink filed a Joint Application in Docket No. 15-UWCC-029-ETC requesting the Commission make the requested findings. The Commission approved the Joint Application and made the requested findings in an Order issued on December 10, 2014.

Because the Commission approved the Joint Application and made the specific findings that USAC requested the companies seek from the Commission in order to streamline reporting and combine the companies' study area codes, it was Commission Staff's understanding that the Commission did not need to include WestLink in its annual certification to the FCC and USAC, beginning with the certification for 2015, which was submitted to the FCC and USAC in 2016.

² USAC email is attached as Exhibit 1.

UW filed the necessary certifications and supporting documentation for all of its study area codes, including WestLink, on June 27, 2016, in Docket No. 16-GIMT-382-GIT.³ The Commission filed its certification letter on September 23, 2016, with the FCC and the USAC to certify that the federal high-cost support provided to the listed carriers was used in 2015 and will be used in 2017 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The list did not include WestLink due to Staff's understanding that reporting had been streamlined for UW, including the WestLink study area, because UW was deemed WestLink's successor-in-interest.

UW received FUSF support in 2017 for the WestLink study area even though the WestLink study area was not included on the Commission's certification. Staff was recently informed by USAC that UW continued to receive support for the WestLink study area in 2017, despite not being included on the certification letter submitted by the Commission to USAC and the FCC, because Commission Staff completed an additional online certification that included WestLink's study area code.

On June 30, 2017, UW filed the necessary certifications and supporting documentation for all of its study area codes. On September 26, 2017, the Commission filed its certification letter with the FCC and the USAC to certify that the listed carriers used the support received in 2016 and will use the support received in 2018 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Similar to 2016, the Commission did not include WestLink on its certification due to the fact that UW was deemed WestLink's successor-in-interest.

On November 7, 2017, USAC contacted Commission Staff asking why WestLink and another carrier were not included on the 2017 certification letter. With regard to WestLink, Commission Staff responded that WestLink was omitted from the list because UW acquired WestLink and was deemed the successor-in-interest in a December 18, 2014 Order. Staff provided USAC with a link to the Order. Staff did not receive any further correspondence from USAC; therefore, Staff had no reason to believe there was cause for concern.

On February 28, 2018, Staff received a call from UW's consultant and was informed that UW did not receive its FUSF support for the WestLink study area because the WestLink study area was not included on the Commission's 2017 certification. Staff has been working with USAC to resolve this issue since this date.

USAC advised Staff on March 9, 2018, that the Commission needs to submit a revised certification letter to the FCC and USAC, so that USAC can provide UW with the WestLink study area FUSF support on a going-forward basis. USAC further informed Staff that it would continue to work with Staff and the FCC to ensure that UW will be able to collect the FUSF support for the WestLink study area that it has not received thus far for 2018.

³ UW acquired another ETC, Epic Touch, but has not requested that it be deemed the successor-in-interest for Epic Touch.

ANALYSIS:

UW filed the required annual ETC forms, including FCC Form 481, for the WestLink study area. Staff reviewed all of the submitted forms and confirmed that UW complied with all annual ETC certification filing requirements for the WestLink study area.

Exhibit 2 to this Report and Recommendation provides a revised list of the companies that submitted their Certification form and the date of each submission, including the WestLink study area.

RECOMMENDATION:

Staff recommends the Commission issue an Order confirming that UW complied with the certification requirements for the Westlink study area. Staff further recommends the Commission submit revised letters to the FCC and USAC as soon as possible, to certify that all federal high-cost support provided to the carriers listed on Exhibit 2, including for the WestLink study area, was used in 2016 and will be used in 2018 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

From: Daniel Meszler
To: [Sandy Reams](#)
Subject: FW: combining SACs
Date: Tuesday, March 06, 2018 3:17:43 PM
Attachments: [image001.png](#)

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

FYI....

From: Joanne Kim [REDACTED]
Sent: Tuesday, April 15, 2014 12:53 PM
To: Stacey Brigham
Subject: RE: combining SACs

Stacey,

Regarding a consolidation of the SACs 419015 and 419011, please confirm the following:

The appropriate State PUC must also find that your client's company is the successor-in-interest to the acquired company and that your client has acquired the company's ETC designation. The State PUC must also find that your client's company should receive and be responsible for any federal universal service funds that the acquired company would have received had it continued to operate as a stand-alone entity for that service area.

The State PUC must also find that your client's company provides continuous seamless service to the entirety of both companies' ETC designated areas through the acquisition.

I will also need any State PUC documentation regarding the acquisition by your client of this company and if you could let me know which of the two is the acquired company, that would be helpful.

Thank you,
Joanne

Joanne Kim

Office: [REDACTED]

Email: [REDACTED]

www.usac.org

From: Stacey Brigham [mailto:[REDACTED]]
Sent: Monday, April 14, 2014 6:14 PM
To: Joanne Kim
Subject: RE: combining SACs

Joanne,
The SACs are 419015 and 419011

Thanks,

Stacey Brigham
[REDACTED]

From: HCLI Questions [<mailto:questions@hcli.universalservice.org>]
Sent: Monday, April 07, 2014 5:53 AM
To: Stacey Brigham
Subject: RE: combining SACs

Stacey,

What are the study area codes?

Thank you,
Joanne

Joanne Kim

Office: [REDACTED]

Email: [REDACTED]

www.usac.org

From: Stacey Brigham [REDACTED]
Sent: Friday, April 04, 2014 2:55 PM
To: HCLI Questions
Subject: combining SACs

Hello,

I have a client that is wanting to combine two study area codes within a state. The wireless ETC has acquired another wireless ETC and has worked with their state commission to consolidate state USF reporting into a single report. They would like to do the same thing on the federal side, but are unclear of the process they need to follow. It is not entirely clear to me whether FCC approval will be required to combine these study areas since these are state designated ETCs. Can someone please direct me to the correct process on this?

Thank you,

STACEY BRIGHAM

Senior Regulatory Consultant

TCA

526 Chapel Hills Drive, Suite 100

Colorado Springs, CO 80920

P: [REDACTED] F: [REDACTED]
[REDACTED]

**Certification for the Use of Federal USF Support
ETCs in Kansas**

Company Name	Study Area no.	Date Received	Comments
Blue Valley Tele-Communications	411746	6/26/2017	Part of Sunflower Study Area
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Cunningham Telephone Co. Inc.	411761	6/30/2017	
Elkhart Telephone Co. Inc.	411764	6/30/2017	
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United Wireless Communications	419011	6/29/2017	
USCOC of NE/KS d/b/a US Cellular	419012	6/30/2017	
WestLink Communications LLC	419015	6/29/2017	

CERTIFICATE OF SERVICE

17-GIMT-405-GIT

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

Electronic Service on __03/13/2018_____.

THOMAS J. CONNORS, ATTORNEY AT LAW
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CERTIFICATE OF SERVICE

17-GIMT-405-GIT

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/s/ DeeAnn Shupe

DeeAnn Shupe