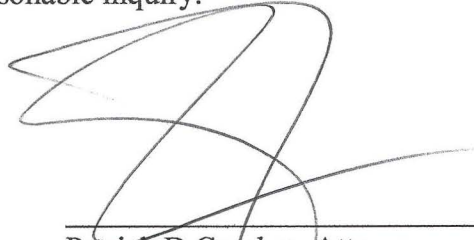




**CERTIFICATION**

I hereby certify that I have supervised the preparation of the responses on behalf of BCN Telecom, Inc. to the Second Request for Information of the Commission Staff upon All Parties and that the responses contained herein are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.



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Attorneys for BCN Telecom, Inc.

Date: September 15, 2016

**Item 1)** *If not already provided in a previous response to a commission staff request for information, respond to the following:*

- a. Provide the monthly Kentucky Universal Service Fund ("KUSF") forms ("KUSF form") submitted to the commission and the Department of Finance and Administration from January 2014 to present.*
- b. Explain how the total number of subscriber lines is calculated for the KUSF form when a new customer received service on the middle of the month.*
- c. Explain how the total number of subscribers lines is calculated for the KUSF form when a customer leaves in the middle of the month,*
- d. Explain how the KUSF surcharge remittance is calculates when you experience a bad debt. Explain whether none of the surcharge amount or the full surcharge amount billed to, but not paid by, the customer is remitted.*
- e. State whether the KUSF surcharge billed to a customer is prorated if the customer has service for less than a full month.*

**Response)**

- a. Attached as Exhibit A, please find BCN Telecom, Inc.'s ("BCN") monthly KUSF forms submitted from January 2014 to present. A Petition for Confidentiality has been submitted contemporaneously with this filing and as such attached please find the REDACTED version of each report.
- b. If a subscriber enrolled in the middle of the month, they were included on the KUSF reimbursement form.
- c. If a subscriber left in the middle of the month, they were not included on the KUSF reimbursement form.
- d. BCN remitted the full amount of the surcharge regardless of whether the customer paid.
- e. No.

**Witness)** Amanda Gucich

**Item 2)** *If no KUSF forms have been submitted to the commission and the Kentucky Department of Finance and Administration from January 2014, to the present, explain why the KUSF forms have not been submitted.*

- a. *If no KUSF forms have been submitted, state whether you collect the KUSF surcharge from your customers.*
- b. *If you do not collect the KUSF surcharge from your customers, explain why the KUSF surcharge has not been collected.*
- c. *If no KUSF forms have been submitted, state whether you remit the KUSF surcharge to the Kentucky Department of Finance and Administration.*
- d. *If you do not remit the KUSF surcharge to the Kentucky Department of Finance and Administration, explain why the KUSF surcharge has not been remitted.*

**Response)**

- a. Not applicable as BCN has supplied copies of the KUSF forms from January 2014 to present.
- b. Not applicable as BCN has supplied copies of the KUSF forms from January 2014 to present.
- c. Not applicable as BCN has supplied copies of the KUSF forms from January 2014 to present.
- d. Not applicable as BCN has supplied copies of the KUSF forms from January 2014 to present.

**Witness)** Amanda Guich

**Item 3)** *Explain the anticipated impact, if any, that the FCC's Lifeline Reform Order will have on the provision of Lifeline services in Kentucky, including, but not limited to, verifying eligibility of lifeline customers; the potential provision of broadband services; and, the impact of the reduction of Federal Universal Service funding for voice services.*

**Response)** The FCC's Lifeline Reform Order will not impact BCN as BCN provided no Lifeline services in Kentucky.

**Witness)** Amanda Gucich

**Item 4)** *In light of the Lifeline Reform Order, explain how a reduction in the amount of, or elimination of, KUSF support would impact the provision of Lifeline services in Kentucky.*

**Response)** BCN provides no lifeline services in Kentucky. As such, BCN is without knowledge of the possible impact of the Lifeline Reform upon Lifeline services in Kentucky.

**Witness)** Amanda Gucich

**EXHIBIT A**