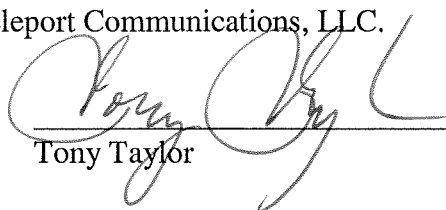


VERIFICATION

I, Tony Taylor, Executive Director of External Affairs for AT&T Kentucky, do hereby state that I have read the foregoing Responses to Second Requests for Information and that the facts and information therein are true and accurate to the best of my knowledge, information and belief and that they were formed after a reasonable inquiry from the records and files kept by Teleport Communications of America, LLC in the regular and ordinary course of business and from interviews of appropriate employees of Teleport Communications, LLC.


Tony Taylor

COMMONWEALTH OF KENTUCKY)


)

COUNTY OF JEFFERSON)

)

I, the undersigned, a Notary Public in and for the State and County aforesaid, do hereby certify that the foregoing document was presented before me by Tony Taylor, who is personally known to me, and I further certify that s/he signed and acknowledged the same to be her/his true act and deed in due form of law.

Witness, my hand, this the 18 day of Aug, 2016.


Notary Public, KY, State-At-Large
My commission expires: 7-25-2020

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") forms¹ ("KUSF form") submitted to the Commission and the Department of finance and Administration from January 2014 to the present.
 - b. Explain how the total number of subscriber lines is calculated for the KUSF form when a new customer receives service in the middle of a month.
 - c. Explain how the total number of subscriber lines is calculated for the KUSF form when a customer leaves in the middle of a month.
 - d. Explain how the KUSF surcharge remittance is calculated 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. Please see Attachment 1 to Teleport Communications America Response to the KPSC Staff's First Request for Information to All Parties.
- b. Please see Teleport Communications America Response to Item 2 in its Response to the KPSC Staff's First Request for Information to All Parties.

¹Commission Staff's First Request for Information referred to these forms as "reimbursement" forms. In this request, Commission Staff is referring to the forms that the parties are to file monthly pursuant to the Commission's decision in *An Inquiry into Universal Service Funding Issues*, Administrative Case No. 360 (Kentucky PSC May, 22, 1998) (form last revised March 10, 2016}. These forms are to be filed regardless of whether a party is seeking reimbursement from the KUSF.

Response: (continued)

- c. Please see Teleport Communications America's Response to Item 3 in its Response to the KPSC Staff's First Request for Information to All Parties.
- d. Please see Teleport Communications America's Response to Item 4 in its Response to the KPSC Staff's First Request for Information to All Parties.
- e. When a customer has service for less than a full month, the surcharge is prorated.

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. N/A. Teleport Communications America has submitted the referenced KUSF Forms. Please see Attachment 1 to Teleport Communications America's Response to the KPSC Staff's First Request for Information to All Parties.
- b. N/A. Please see response a. above.
- c. N/A. Please see response a. above.
- d. N/A. Please see response a. above.

3. Explain the anticipated impact, if any, that the FCC's recent *Lifeline Reform Order*² will have on the provision of Lifeline service in Kentucky, including, but not limited to, verifying eligibility of Lifeline customers; the potential provision of broadband service; and, the impact of the reduction of Federal Universal Service funding for voice service.

Response: Teleport Communications America concurs in the response to Item 3 submitted by AT&T Kentucky in its Responses to the Staff's Second Request for Information to All Parties of Record.

²See Lifeline and Link Up Reform and Modernization, we Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, we Docket No 09-197; Connect America Fund, we Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration (Rei. April 27, 2016}. ("Lifeline Reform Order").

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 service in Kentucky.

Response: Teleport Communications America does not take a position on the whether the Kentucky Commission should reduce or eliminate KUSF support for Lifeline. This is a policy decision for Kentucky policymakers. However, if the Kentucky Commission reduces or eliminates KUSF support for Lifeline, the Kentucky Commission should also make clear that no Lifeline provider has any obligation to offer Kentucky Lifeline discounts, except to the extent that it is eligible to be reimbursed for the Kentucky discounts. If, for example, the Kentucky Commission eliminates KUSF Lifeline reimbursements, but requires that Lifeline providers continue to make available the current \$3.50/month state Lifeline discount, the result would be to impose an unfunded mandate upon participating providers. This would discourage voluntary provider participation in Lifeline, ultimately inhibiting the Lifeline service choices available to participating consumers.