

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**AN INQUIRY INTO THE STATE     )  
UNIVERSAL SERVICE FUND        )**

**CASE NO.  
2016-00059**

**SI WIRELESS, LLC'S RESPONSE TO COMMISSION STAFF'S SECOND REQUEST  
FOR INFORMATION**

SI Wireless, LLC hereby serves its Responses to the Kentucky Public Service Commission Request for Information dated June 22, 2016.

**REQUEST NO. 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 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. Commission 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 (KY. 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.
- 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:** Request 1(a) – (d) have been provided in a previous response.

**RESPONSIBLE WITNESS:** Michael Beehn, Chief Operating Officer

**REQUEST NO. 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:** Request 2(a) – (d) have been provided in a previous response.

**RESPONSIBLE WITNESS:** Michael Beehn, Chief Operating Officer

**REQUEST NO. 3.** Explain the anticipated impact, if any, that the FCC's recent *Lifeline Reform Order*<sup>1</sup> 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:**

The National Lifeline Eligibility Verifier will assume several functions that previously were served by ETCs, their vendors and the states. The *Lifeline Reform Order* sets the expectation that the national verifier will conduct timely reviews and that the manual and electronic certification processes will be completed in a reasonable amount of time.

As for the emphasis on broadband support at the expense of continued federal support for voice services, the decision undervalues voice service as a tool for low-income residents.

**RESPONSIBLE WITNESS:** Michael Beehn, Chief Operating Officer

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<sup>1</sup> See *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Connect America Fund*, WC Docket No. 10-90, *Third Report and Order, Further Report and Order, and Order on Reconsideration* (Rel. April 27, 2016). (“Lifeline Reform Order”).

**REQUEST NO. 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:**

The Lifeline Reform Order adopts a step-down of standalone voice service support, with full discontinuation of support entirely as of December 1, 2021. This approach fails to adequately take into account the tremendous value that voice service has for low-income individuals, particularly the elderly population. Maintenance of KUSF support will help ETCs to extend the viability of voice service at the minimum service standards that so that low-income Kentuckians will not lose access to affordable voice services, including emergency calling.

**RESPONSIBLE WITNESS:** Michael Beehn, Chief Operating Officer

Respectfully Submitted,



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Douglas F. Brent  
STOLL KEENON OGDEN PLLC  
500 West Jefferson St.  
2000 PNC Plaza  
Louisville, Kentucky 40202  
Ph: (502) 333-6000  
Fax: (502) 333-6099  
Email: [douglas.brent@skofirm.com](mailto:douglas.brent@skofirm.com)

*Counsel for SI Wireless, LLC*

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that the September 16, 2016 electronic filing of these Data Responses is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on September 16, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of these Data Responses will be mailed to the Commission by first class United States mail, postage prepaid, on September 16, 2016.

A handwritten signature in black ink, appearing to read 'Douglas F. Brent', written over a horizontal line.

Douglas F. Brent