AN INQUIRY INTO THE STATE UNIVERSAL SERVICE FUND
CASE NO. 2016-00059

The RLECs', ETC CLECs', and non-ETC CLECs’ Responses to the Commission
Staff’s Supplemental Requests for Information to All Parties
dated June 22, 2016

July 13, 2016

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INQUIRY INTO THE STATE UNIVERSAL SERVICE FUND )
CASE NO. ) 2016-00059

The RLECs', 1 ETC CLECs', 2 and non-ETC CLECs' 3 Responses to the Commission Staff's Supplemental Requests for Information to All Parties dated June 22, 2016

FILED: July 13, 2016

1 Ballard Rural Telephone Cooperative Corporation, Inc.; Brandenburg Telephone Company; Duo County Telephone Cooperative, Inc.; Foothills Rural Telephone Cooperative, Inc.; Gearheart Communications Co., Inc.; Highland Telephone Cooperative, Inc.; Logan Telephone Cooperative, Inc.; Mountain Rural Telephone Cooperative, Inc.; North Central Telephone Cooperative Corporation; Peoples Rural Telephone Cooperative, Inc.; South Central Rural Telephone Cooperative Corporation, Inc.; Thacker-Grigsby Telephone Company, Inc.; and West Kentucky Rural Telephone Cooperative Corporation, Inc. (collectively, the “RLECs”).
2 Cumberland Cellular, Inc. d/b/a Duo County Telecom; North Central Communications; and South Central Telcom, LLC (collectively, the “ETC CLECs”).
3 Brandenburg Telecom, LLC; Cellular Services, LLC; Inter Mountain Cable, Inc.; Peeples Telecom, LLC; and TV Services, Inc. (collectively, the “non-ETC CLECs”).
AN INQUIRY INTO THE STATE UNIVERSAL SERVICE FUND
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THE RLECs’, CLECs’, and non-ETC CLECs’ RESPONSES TO THE COMMISSION’S SECOND REQUEST FOR INFORMATION TO ALL PARTIES OF RECORD

1 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 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. The RLECs and ETC CLECs provided the requested monthly KUSF forms in response to Request No. 1 in the Commission’s Requests for Information to All Parties That Received Payment from the Kentucky Universal Service Fund.

Please see the KUSF forms submitted to the Commission and the Department of Finance and Administration by Brandenburg Telecom, LLC and TV Services, Inc. from January 2014 to the present, attached hereto as Exhibits 1-2.

Cellular Services, LLC has never provided any voice services to the public. Therefore, Cellular Services, LLC did not file any KUSF forms between January 2014 and the present. Please also see Cellular Services, LLC’s Response to the Commission’s Supplemental Request No. 2 issued to All Parties.

Inter Mountain Cable, Inc. does not submit KUSF forms because it does not provide any services subject to the KUSF surcharge. Please also see Inter Mountain Cable, Inc.’s Response to the Commission’s Supplemental Request No. 2 issued to All Parties.

Peoples Telecom, LLC is a new entity that was not providing any services during the timeframe referenced in the Commission Staff’s Initial Requests for Information to All Parties, Item 1. Because it had no customers and provided no services, it did not collect any KUSF surcharges, remit any KUSF surcharges, or file any KUSF reimbursement forms. Starting in May of 2016, Peoples Telecom, LLC began providing voice and other services. It presently serves...
approximately 20 customers. Because it provides voice services, it understands that it must collect and remit the KUSF surcharge from those customers, and it is scheduled (in August) to submit its initial report and remittance reflecting its line count since service commencement. Following the August report submission, it anticipates it will file future reports and remittances on a monthly basis rather than a quarterly basis. Because it has no Lifeline customers, however, Peoples Telecom, LLC will not seek any reimbursement from the KUSF. Please also see Peoples Telecom, LLC’s Response to the Commission’s Supplemental Request No. 2 issued to All Parties.

b. The RLECs, ETC CLECs, and non-ETC CLECs explained how the number of subscriber lines is calculated for the KUSF form when a new customer receives service in the middle of a month in response to Request No. 2 in the Commission’s Initial Requests for Information to All Parties.

Please also see the RLECs, ETC CLECs, and non-ETC CLECs response to the Commission’s Supplemental Request No. 2 served upon the RLECs, ETC CLECs, and non-ETC CLECs.

c. The RLECs, ETC CLECs, and non-ETC CLECs explained how the total number of subscriber lines is calculated for the KUSF form when a customer leaves in the middle of a month in response to Request No. 3 in the Commission’s Initial Requests for Information to All Parties.
Please also see the RLECs, ETC CLECs, and non-ETC CLECs response to the Commission’s Supplemental Request No. 2 served upon the RLECs, ETC CLECs, and non-ETC CLECs.

d. The RLECs, ETC CLECs, Brandenburg Telecom, LLC, and TV Services, Inc. explained how the KUSF surcharge remittance is calculated when they experience a bad debt in response to Request No. 4 in the Commission’s Initial Requests for Information to All Parties.

In an effort to clarify their Response to Request No. 4 in the Commission’s Initial Requests for Information to All Parties, Cellular Services, LLC and Inter Mountain Cable, Inc. state that they do not currently remit the KUSF surcharge because they do not provide any services subject to the KUSF surcharge. In the event either entity begins providing services subject to the KUSF surcharge, when a bad debt was experienced they would calculate the KUSF surcharge remittance consistent with their Response to Request No. 4 in the Commission’s Initial Requests for Information to All Parties.

In an effort to clarify its Response to Request No. 4 in the Commission’s Initial Requests for Information to All Parties, Peoples Telecom, LLC states that it was not providing service to the public at the time it responded to the Commission’s Initial Requests for Information. Peoples Telecom LLC’s Response to Request No. 4 in the Commission’s Initial Requests for Information accurately indicated how it plans to calculate the KUSF surcharge remittance when it
experiences a bad debt. Please also see Peoples Telecom, LLC’s Response to the Commission’s
Supplemental Request No. 1(a) issued to All Parties.

e. Ballard Rural Telephone Cooperative Corporation, Inc., Brandenburg Telephone
Company, Foothills Rural Telephone Cooperative, Inc., Highland Telephone Cooperative, Inc.,
Peoples Rural Telephone Cooperative, Inc., Thacker-Grigsby Telephone Company, Inc., and
West Kentucky Rural Telephone Cooperative Corporation, Inc., Brandenburg Telecom, LLC,
and TV Services, Inc. state that the KUSF surcharge billed to a customer is prorated if the
customer has service for less than a month.

Duo County Telephone Cooperative, Inc., Gearheart Communications Co., Inc., Logan
Telephone Cooperative, Inc., Mountain Rural Telephone Cooperative, Inc., North Central
Telephone Cooperative Corporation, Cumberland Cellular, Inc., and North Central
Communications state that they do not prorate the KUSF surcharge billed to a customer if the
customer has service for less than a month. Rather, that customer is billed the full 14 cent
surcharge whether they started or ended service in the middle of a month.

South Central Rural Telephone Cooperative Corporation, Inc. and South Central
Telecom, LLC state that they do not prorate the KUSF surcharge billed to a customer if the
customer terminates service in the middle of a month. If a customer begins service in the middle
of a month, the KUSF surcharge is not imposed.
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Cellular Services, Inc. does not bill the KUSF surcharge because it has never provided  
any voice services. Please also see Cellular Services, LLC's Response to the Commission’s  
Supplemental Request No. 2 issued to All Parties.

Inter Mountain Cable, Inc. does not bill the KUSF surcharge because it does not provide  
any services subject to the KUSF surcharge. Please also see Inter Mountain Cable, Inc.'s  
Response to the Commission’s Supplemental Request No. 2 issued to All Parties.

Peoples Telecom, LLC is a new entity that was not providing any services during the  
timeframe referenced in the Commission Staff's Initial Requests for Information to All Parties,  
Item 1. Because it had no customers and provided no services, it did not collect any KUSF  
surcharges. Starting in May of 2016, Peoples Telecom, LLC began providing voice and other  
services. It presently serves approximately 20 customers. Because it provides voice services, it  
understands that it must collect and remit the KUSF surcharge from those customers, and it is  
scheduled (in August) to submit its initial report and remittance reflecting its line count since  
service commencement. Peoples Telecom, LLC states that it plans to prorate the KUSF  
surcharge billed to a customer if the customer has service for less than a month. Please also see  
Peoples Telecom, LLC's Response to the Commission’s Supplemental Request No. 2 issued to  
All Parties.

Witness)  Randy C. Grogan (Ballard Rural Telephone Cooperative Corporation, Inc.)

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Allison T. Willoughby (Brandenburg Telephone Company and Brandenburg
  Telecom, LLC)

Thomas E. Preston (Duo County Telephone Cooperative, Inc. and Cumberland
  Cellular, Inc.)

Ruth Conley (Foothills Rural Telephone Cooperative, Inc. and Cellular Services,
  LLC)

James Campbell (Gearheart Communications Co., Inc. and Inter Mountain Cable,
  Inc.)

Dave Crawford (Highland Telephone Cooperative, Inc.)

Greg Hale (Logan Telephone Cooperative, Inc.)

Shayne Ison (Mountain Rural Telephone Cooperative, Inc.)

Johnny McClanahan (North Central Telephone Cooperative Corporation and
  North Central Communications)

Keith Gabbard (Peoples Rural Telephone Cooperative, Inc. and Peoples Telecom,
  LLC)

Jeff Eaton (South Central Rural Telephone Cooperative Corporation, Inc. and
  South Central Telcom LLC)

William K. Grigsby (Thacker-Grigsby Telephone Company, Inc. and TV
  Services, Inc.)
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Karen Jackson-Furman (West Kentucky Rural Telephone Cooperative Corporation, Inc.)
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) This request is not applicable to the RLECs, ETC CLECs, Brandenburg Telecom, LLC, and TV Services, Inc. because they submit the KUSF form.

Cellular Services, LLC has not provided KUSF forms between January 2014 and the present because Cellular Services, LLC has never provided any voice services.

Inter Mountain Cable, Inc. does not collect the KUSF surcharge and does not file the KUSF form because Inter Mountain Cable, Inc. only provides VoIP services, which are not subject to the KUSF surcharge.
Peoples Telecom, LLC is a new entity that was not providing any services during the timeframe referenced in the Commission Staff’s Initial Requests for Information to All Parties, Item 1. Because it had no customers and provided no services, it did not collect any KUSF surcharges, remit any KUSF surcharges, or file any KUSF reimbursement forms. Starting in May of 2016, Peoples Telecom, LLC began providing voice and other services. It presently serves approximately 20 customers. Because it provides voice services, it understands that it must collect and remit the KUSF surcharge from those customers, and it is scheduled (in August) to submit its initial report and remittance reflecting its line count since service commencement. Following the August report submission, it anticipates it will file future reports and remittances on a monthly basis rather than a quarterly basis. Because it has no Lifeline customers, however, Peoples Telecom, LLC will not seek any reimbursement from the KUSF. Please also see Peoples Telecom, LLC’s Response to the Commission’s Supplemental Requests No. 1 Issued to All Parties and its Response to the Commission’s Supplemental Requests No. 1 Issued to the CLECs, ETC CLECs, and non-ETC CLECs.

a. This request is not applicable to the RLECs, ETC CLECs, Brandenburg Telecom, LLC, and TV Services, Inc. because they submit the KUSF form as required, and collect the KUSF surcharge from their customers.

Please see Cellular Services, Inc., Inter Mountain Cable, Inc., and Peoples Telecom, LLC’s Response to the Commission’s Supplemental Request 2(b) below.
b. This request is not applicable to the RLECs, ETC CLECs, Brandenburg Telecom, LLC, and TV Services, Inc, each of whom collect the surcharge from their customers. Cellular Services, Inc. does not collect the KUSF surcharge because it does not provide any voice services. Please also see Cellular Services, LLC’s Response to the Commission’s Supplemental Request No. 1 issued to All Parties. Inter Mountain Cable, Inc. does not collect the KUSF surcharge because it only provides VoIP services, which are not subject to the KUSF surcharge. Please also see Inter Mountain Cable, Inc.’s Response to the Commission’s Supplemental Request No. 1 issued to All Parties. Peoples Telecom, LLC is a new entity that was not providing any services during the timeframe referenced in the Commission Staff’s Initial Requests for Information to All Parties, Item 1. Because it had no customers and provided no services, it did not collect any KUSF surcharges, remit any KUSF surcharges, or file any KUSF reimbursement forms. Starting in May of 2016, Peoples Telecom, LLC began providing voice and other services. It presently serves approximately 20 customers. Because it provides voice services, it understands that it must collect and remit the KUSF surcharge from those customers, and it is scheduled (in August) to submit its initial report and remittance reflecting its line count since service commencement. Following the August report submission, it anticipates it will file future reports and remittances on a monthly basis rather than a quarterly basis. Because it has no Lifeline customers, however, Peoples Telecom, LLC will not seek any reimbursement from the KUSF. Please also see Peoples
Telecom, LLC’s Response to the Commission’s Supplemental Request No. 1 issued to All Parties.

c. This request is not applicable to the RLECs, ETC CLECs, Brandenburg Telecom, LLC, and TV Services, Inc. because they each submit the KUSF form and remit the KUSF surcharge.

Cellular Services, Inc. does not remit the KUSF surcharge to the Kentucky Department of Finance and Administration because it does not provide any voice services.

Inter Mountain Cable, Inc. does not remit the KUSF surcharge to the Kentucky Department of Finance and Administration because it only provides VoIP services, which are not subject to the KUSF surcharge.

Peoples Telecom, LLC is a new entity that was not providing any services during the timeframe referenced in the Commission Staff’s Initial Requests for Information to All Parties, Item 1. Because it had no customers and provided no services, it did not collect any KUSF surcharges, remit any KUSF surcharges, or file any KUSF reimbursement forms. Starting in May of 2016, Peoples Telecom, LLC began providing voice and other services. It presently serves approximately 20 customers. Because it provides voice services, it understands that it must collect and remit the KUSF surcharge from those customers, and it is scheduled (in August) to submit its initial report and remittance reflecting its line count since service commencement.

Following the August report submission, it anticipates it will file future reports and remittances.
on a monthly basis rather than a quarterly basis. Because it has no Lifeline customers, however,
Peoples Telecom, LLC will not seek any reimbursement from the KUSF. Please also see Peoples
Telecom, LLC’s Responses to the Commission’s Supplemental Requests No. 1 Issued to All
Parties and its Responses to the Commission’s Supplemental Requests No. 1 Issued to the
RLECs, ETC CLECs, and non-ETC CLECs.

d. This request is not applicable to the RLECs, ETC CLECs, Brandenburg Telecom,
LLC, and TV Services, Inc. because they each remit the KUSF surcharge.

Cellular Services, Inc. does not remit the KUSF surcharge because it does not provide
any voice services.

Inter Mountain Cable, Inc. does not remit the KUSF surcharge because it only provides
VoIP services, which are not subject to the KUSF surcharge.

Peoples Telecom, LLC is a new entity that was not providing any services during the
timeframe referenced in the Commission Staff’s Initial Requests for Information to All Parties,
Item 1. Because it had no customers and provided no services, it did not collect any KUSF
surcharges, remit any KUSF surcharges, or file any KUSF reimbursement forms. Starting in May
of 2016, Peoples Telecom, LLC began providing voice and other services. It presently serves
approximately 20 customers. Because it provides voice services, it understands that it must
collect and remit the KUSF surcharge from those customers, and it is scheduled (in August) to
submit its initial report and remittance reflecting its line count since service commencement.
Following the August report submission, it anticipates it will file future reports and remittances on a monthly basis rather than a quarterly basis. Because it has no Lifeline customers, however, Peoples Telecom, LLC will not seek any reimbursement from the KUSF. Please also see Peoples Telecom, LLC’s Responses to the Commission’s Supplemental Requests No. 1 Issued to All Parties and its Responses to the Commission’s Supplemental Requests No. 1 Issued to the RLECs, ETC CLECs, and non-ETC CLECs.

Witness) Randy C. Grogan (Ballard Rural Telephone Cooperative Corporation, Inc.)

Allison T. Willoughby (Brandenburg Telephone Company and Brandenburg Telecom, LLC)

Thomas E. Preston (Duo County Telephone Cooperative, Inc. and Cumberland Cellular, Inc.)

Ruth Conley (Foothills Rural Telephone Cooperative, Inc. and Cellular Services, LLC)

James Campbell (Gearheart Communications Co., Inc. and Inter Mountain Cable, Inc.)

Dave Crawford (Highland Telephone Cooperative, Inc.)

Greg Hale (Logan Telephone Cooperative, Inc.)

Shayne Ison (Mountain Rural Telephone Cooperative, Inc.)
Johnny McClanahan (North Central Telephone Cooperative Corporation and North Central Communications)
Keith Gabbard (Peoples Rural Telephone Cooperative, Inc. and Peoples Telecom, LLC)
Jeff Eaton (South Central Rural Telephone Cooperative Corporation, Inc. and South Central Telcom LLC)
William K. Grigsby (Thacker-Grigsby Telephone Company, Inc. and TV Services, Inc.)
Karen Jackson-Furman (West Kentucky Rural Telephone Cooperative Corporation, Inc.)
Item 3)  Explain the anticipated impact, if any, that the FCC’s recent Lifeline Reform Order 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 RLECs, ETC CLECs, and non-ETC CLECs state that they do not believe the FCC’s recent Lifeline Reform Order will have material impact on their provision of Lifeline service in Kentucky. Providing Lifeline services is not the primary business objective of the RLECs, ETC CLECs, and non-ETC CLECs. Therefore, they do not make major business decisions based upon changes to the Lifeline rules. Rather, the RLECs and ETC CLECs apply the Lifeline credit to applicable services and comply with the rules, including rules related to verifying the eligibility of Lifeline customers, in effect at that time. The non-ETC CLECs do not serve any Lifeline customers. The RLECs and ETC CLECs believe that a shift in support from voice service to broadband service could lead to a diminished number of Lifeline customers and therefore a diminished number of phone lines served because there is a significant percentage of seniors and low-income residents that do not subscribe to broadband today. These customers would see an increase in their phone bills that would not be offset by a corresponding credit on broadband. Because the non-ETC CLECs do not provide Lifeline service, they do not have a...
position at this time regarding the anticipated impact, if any, that the FCC’s recent *Lifeline Reform Order* will have on the provision of Lifeline service in Kentucky.

The RLECs, ETC CLECs, and non-ETC CLECs cannot speak to what decisions other Lifeline providers may make. Thus, they cannot anticipate the overall impact the *Lifeline Reform Order* will have on voice service in Kentucky.

**Witness**

Randy C. Grogan (Ballard Rural Telephone Cooperative Corporation, Inc.)

Allison T. Willoughby (Brandenburg Telephone Company and Brandenburg Telecom, LLC)

Thomas E. Preston (Duo County Telephone Cooperative, Inc. and Cumberland Cellular, Inc.)

Ruth Conley (Foothills Rural Telephone Cooperative, Inc. and Cellular Services, LLC)

James Campbell (Gearheart Communications Co., Inc. and Inter Mountain Cable, Inc.)

Dave Crawford (Highland Telephone Cooperative, Inc.)

Greg Hale (Logan Telephone Cooperative, Inc.)

Shayne Ison (Mountain Rural Telephone Cooperative, Inc.)
Johnny McClanahan (North Central Telephone Cooperative Corporation and North Central Communications)

Keith Gabbard (Peoples Rural Telephone Cooperative, Inc. and Peoples Telecom, LLC)

Jeff Eaton (South Central Rural Telephone Cooperative Corporation, Inc. and South Central Telcom LLC)

William K. Grigsby (Thacker-Grigsby Telephone Company, Inc. and TV Services, Inc.)

Karen Jackson-Furman (West Kentucky Rural Telephone Cooperative Corporation, Inc.)
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 service in Kentucky.

Response) The RLECs, ETC CLECs, and non-ETC CLECs state that a reduction in KUSF support is not likely to materially impact their provision of Lifeline service in Kentucky. Providing Lifeline services is not the primary business objective of the RLECS, ETC CLECs, and non-ETC CLECs. Therefore, they do not make major business decisions based upon changes to Lifeline service.

The RLECs and ETC CLECs cannot speak as to how other providers of Lifeline service would react to a reduction in the amount of, or elimination of, KUSF support. Accordingly, the RLECs and ETC CLECs cannot provide an opinion as to the overall impact a reduction of, or elimination of, KUSF support would have on the provision of Lifeline service in Kentucky.

Because the non-ETC CLECs do not provide Lifeline service, they do not have a position at this time regarding the anticipated impact, if any, that the FCC’s recent Lifeline Reform Order will have on the provision of Lifeline service in Kentucky.

Please also see the RLECs’, ETC CLECs’, and non-ETC CLECs’ Response to Request No. 3 Issued to All Parties.
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Witness) Randy C. Grogan (Ballard Rural Telephone Cooperative Corporation, Inc.)
        Allison T. Willoughby (Brandenburg Telephone Company and Brandenburg
        Telecom, LLC)
        Thomas E. Preston (Duo County Telephone Cooperative, Inc. and Cumberland
        Cellular, Inc.)
        Ruth Conley (Foothills Rural Telephone Cooperative, Inc. and Cellular Services,
        LLC)
        James Campbell (Gearheart Communications Co., Inc. and Inter Mountain Cable,
        Inc.)
        Dave Crawford (Highland Telephone Cooperative, Inc.)
        Greg Hale (Logan Telephone Cooperative, Inc.)
        Shayne Ison (Mountain Rural Telephone Cooperative, Inc.)
        Johnny McClanahan (North Central Telephone Cooperative Corporation and
        North Central Communications)
        Keith Gabbard (Peoples Rural Telephone Cooperative, Inc. and Peoples Telecom,
        LLC)
        Jeff Eaton (South Central Rural Telephone Cooperative Corporation, Inc. and
        South Central Telcom LLC)
William K. Grigsby (Thacker-Grigsby Telephone Company, Inc. and TV Services, Inc.)

Karen Jackson-Furman (West Kentucky Rural Telephone Cooperative Corporation, Inc.)
CERTIFICATION

I hereby certify that I have supervised the preparation of the responses on behalf of Brandenburg Telephone Company and Brandenburg Telecom, LLC to the Requests for Information of the Commission Staff, and that the responses contained herein are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

Allison T. Willoughby
General Manager/President
Brandenburg Telephone Company

President
Brandenburg Telecom, LLC

Date: /-13-16

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CERTIFICATION

I hereby certify that I have supervised the preparation of the responses on behalf of Logan Telephone Cooperative, Inc. to the Requests for Information of the Commission Staff, and that the responses contained herein are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

Greg Hale
General Manager and Executive Vice President
Logan Telephone Cooperative, Inc.

Date: 7-13-16
CERTIFICATION

I hereby certify that I have supervised the preparation of the responses on behalf of Thacker-Grigsby Telephone Company, Inc. and TV Services, Inc. to the Requests for Information of the Commission Staff, and that the responses contained herein are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

[Signature]

William K. Grigsby
General Manager/President
Thacker-Grigsby Telephone Company, Inc.

General Manager/President
TV Services, Inc.

Date: 7/13/2016
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CERTIFICATION

I hereby certify that I have supervised the preparation of the responses on behalf of West Kentucky Rural Telephone Cooperative Corporation, Inc. to the Requests for Information of the Commission Staff, and that the responses contained herein are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

Karen Jackson-Furman  
CFO/CIO  
West Kentucky Rural Telephone Cooperative Corporation, Inc.

Date: 07/13/16