

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	CASE NO.
FUNDING FOR THE TELECOMMUNICATIONS)	2023-00339
RELAY SERVICE)	

COMMENTS OF THE KENTUCKY BROADBAND & CABLE ASSOCIATION

In response to the Order of the Public Service Commission (“PSC”) entered on November 20, 2023, in the above-referenced case, the Kentucky Broadband & Cable Association (“KBCA”) respectfully submits the following comments.

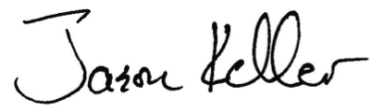
The PSC’s Order seeks comment on the question of whether the current Telecommunications Relay Service (“TRS”) fund surcharge should be changed. The KBCA’s membership includes service providers that assess and collect the TRS surcharge and, therefore, have a material interest in how the TRS surcharge is administered.

At this time, the KBCA takes no position on the question of whether the TRS surcharge should be changed. However, the KBCA notes that, when the PSC previously has changed other surcharges, such as the KUSF surcharge, it has made the change effective “beginning with bills rendered on and after the date of [the] Order, or, as soon as allowed by applicable contracts between customers and carriers.” *In re An Inquiry into the State Universal Service Fund*, Case No. 2016-00059, Order (Ky. PSC Sep. 19, 2023).

The KBCA submits to the PSC that implementing a change to a billed surcharge is difficult to do within a single billing cycle. This difficulty imposes an unreasonable burden on the service providers that assess and collect the surcharge on the PSC’s behalf. Therefore, the KBCA respectfully requests that, if the PSC decides to change the TRS surcharge as a result of its

current investigation, the PSC should allow service providers at least 60 days from the date of the PSC's Order to implement the billing change.

Respectfully submitted, December 18, 2023.

A handwritten signature in black ink that reads "Jason Keller". The signature is written in a cursive style with a large, stylized "J" and "K".

Jason Keller
Board Chairman
Kentucky Broadband & Cable Association