THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the Matter of an Investigation to Determine the Assessment Rate for the Eighteenth Year of the Kansas Universal Service Fund, Effective March 1, 2014.	))))	Docket No. 14-GIMT-105-GIT

ORDER ON PETITIONS FOR RECONSIDERATION

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed its files and records and being fully advised on all matters of record, the Commission makes the following findings:

I. Background:

1. On January 23, 2014, the Commission issued the *Order Adopting KUSF Assessment Rate for Year Eighteen of KUSF Operations* (Assessment Rate Order), setting the Kansas Universal Service Fund (KUSF) assessment rate for Year Eighteen. Additionally, the Assessment Rate Order referenced concerns raised by GVNW Consulting, Inc. (GVNW), the current KUSF Administrator, regarding KUSF contributions.

2. On March 18, 2014, in response to GVNW's concerns, the Commission issued an *Order Soliciting Comments Regarding KUSF Contribution Issues; Requiring Entry of Appearance to Actively Participate* (Order Soliciting Comments).

3. On October 3, 2014, Commission Staff (Staff) filed its Report and Recommendation (Staff R&R) summarizing the parties' positions and recommending that the Commission:

(1) adopt the Federal Communications Commission's (FCC) rules regarding allocation and reporting of end-user discounts for KUSF contribution purposes;
(2) adopt the FCC's safe harbor provisions for all bundled services that include assessable telecommunications service;
(3) require providers, including interconnected Voice over Internet Protocol (VoIP) providers, to follow the bundled service safe harbor provisions for all bundled service offerings, including those marketed as offering free telecommunications service;
(4) require companies to maintain customer billing records for a period of no less than three-years after the end of a KUSF fiscal year; and
(5) allow companies to report Early Termination Fee (ETF) revenue using the accrual, modified cash, or cash [basis] method of accounting provided the company's external auditor agrees with such method.[1]

Staff also suggested a "wait and see" approach to the global issue of whether to further modify the KUSF contribution methodology policy.[2]

4. On October 27, 2014, Southwestern Bell Telephone Company, Teleport Communications America, LLC, AT&T Corp., SBC Long Distance, LLC, Bell South Long Distance, Inc. d/b/a AT&T Long Distance Service and New Cingular Wireless PCS, LLC (collectively AT&T), and T-Mobile Central, LLC (T-Mobile) filed a response to Staff's R&R.

5. On November 6, 2014, Cox Kansas Telcom, LLC (Cox) filed a reply to AT&T's and T-Mobile's responses to Staff's R&R, agreeing with and supporting AT&T and T-Mobile's positions.

6. On October 20, 2015, the Commission issued the Order Determining KUSF Contribution Methodology (Order) pertaining to discounts and bundled services. The Commission found:

> A) Providers may report revenue net of end-user discounts only when the purchased service or services are comprised completely of KUSF assessable services. When the KUSF assessable services are bundled with non-assessable services, Providers must either report the stand-alone price of the KUSF assessable services, without applying discounts, or report the revenue for the

[1] Staff R&R at 1-2.
[2] *Id.* at 2.

entire bundle net of discounts. The 90-day window to recognize promotion discounts is abolished.

B) When KUSF assessable services are bundled with non-assessable services, Providers shall report for KUSF contribution purposes the stand-alone price of KUSF assessable services. This methodology applies to all Providers, including Interconnected VoIP Providers that bundle assessable services with non-assessable services, such as CPE [customer premise equipment]. A Provider may determine the stand-alone price based on substantial competent evidence (cost, usage or traffic studies, etc.). In the event the Provider does not have a stand-alone price, or chooses not to determine or assign such, the total price of the bundle may be reported. For all bundled services, regardless of how provisioned (wireless, VoIP, etc.), the use of the safe harbors will be deemed reasonable.

C) If assessable services are offered with non-assessable service revenues, including those from a connection device, an alternative methodology may be used to assign or allocate revenue to the assessable service. Such alternative methodology is subject to an evaluation for reasonableness to ensure a Provider meets its KUSF obligations through an audit or enforcement action on a case-by-case basis.

9. On November 3, 2015, Sprint Communications Company L.P, Sprint Spectrum L.P., Nextel West Corp., and Virgin Mobile USA, L.P. (collectively Sprint), filed a Petition for Reconsideration. Sprint requests clarification on whether the alternative methodology language applies to the discount sections of the Order and, if not, reconsideration to extend reasonable alternative methodologies to the treatment and reporting of discounts.[3]

10. On November 4, 2015, AT&T filed a Petition for Clarification and/or Limited Reconsideration. AT&T seeks clarification or reconsideration of the Commission's Order paragraphs 19 and 20, stating the language of the provisions in question is inconsistent in how each treats discounted services, bundled services and allocation of assessable and non-assessable review.[4]

[3] Petition for Reconsideration at ¶ 12 (Nov. 3, 2015).
[4] AT&T's Petition for Clarification and/or Limited Reconsideration at ¶ 5 (Nov. 4, 2015).

11. On November 4, 2015, Cox filed Petition for Reconsideration. Cox requests the Commission reconsider its Order requiring providers to report revenue gross of end-user discounts, or, in the alternative, reconsider its Order to allow providers to use an alternative methodology to report discounts consistent with its decision regarding the treatment of bundled services.[5]

12. On November 4, 2015, T-Mobile filed a Petition for Reconsideration. T-Mobile requests the Commission reconsider its Order to allow providers to report revenue net of discounts on assessable services, or, in the alternative, with respect to discounts, allow carriers to use an alternative methodology subject to evaluation by the Commission as allowed for bundled services.[6] T-Mobile raises the additional concerns over interstate and intrastate allocation and the Order's alleged discriminatory effect.[7] T-Mobile requested the Commission hold the Order in abeyance pending an industry roundtable or workshop where industry is given the opportunity to provide the Commission with direct information on the issues.[8]

13. On November 4, 2015, USCOC of Nebraska/Kansas, LLC, and Kansas #15, LP, d/b/a U.S. Cellular (U.S. Cellular) filed a Petition for Reconsideration. U.S. Cellular requests the Commission reconsider the aspect of its Order requiring providers to report revenue gross of end-user discounts, or in the alternative, reconsider its Order to allow providers to use an alternative methodology regarding discounts consistent with its decision regarding the treatment of bundled services.[9] Further, U.S. Cellular requests the Commission hold the Order in abeyance pending an industry roundtable or workshop where industry is given the opportunity to provide

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[5] Petition for Reconsideration of Cox Kansas Telecom, LLC at ¶ 11 (Nov. 4, 2015).
[6] Petition for Reconsideration of T-Mobile Central LLC at ¶¶ 11, 12 (Nov. 4, 2015).
[7] *Id.* at ¶¶ 5, 7.
[8] *Id.* at ¶ 13.
[9] Petition for Reconsideration of the Commission's October 20, 2015 Order Determining KUSF Contribution Methodology at ¶ 3 (Nov. 4, 2015).

the Commission with direct information on revenue reporting or other issues relevant to the discussion.[10]

14. On November 13, 2015, Commission Staff filed its response to the Petitions for Reconsideration. Staff believes that the Commission's Order was reasonable and recommends that the Commission deny reconsideration. In the alternative, Staff suggests the Commission may adopt an additional methodology with regard to discounts that would allow the accounting of discounts in a prorated fashion based upon the allocation of services.

15. On November 23, 2015, Comcast Phone of Kansas LLC, d/b/a/ Comcast Digital Phone (Comcast), filed a reply to Staff's response. Comcast did not file a petition for reconsideration.

II. <u>Analysis</u>:

16. K.S.A. 66-118b requires that any aggrieved party to a Commission order must petition for reconsideration before the issues may be taken up upon judicial review. The purpose for requiring the petition for reconsideration is to inform the Commission of mistakes of law or fact made in the order.[11] "The allegation of grounds must be sufficiently specific and direct to apprise the commission and opposing parties of the actual points relied on."[12]

Clarification/Reconsideration, Generally

17. The majority of the petitions identify three general remedies that can be addressed together: 1) reconsideration of the requirement to report revenue gross of end-user discounts; 2) clarification if the Commission intended for Providers to utilize an alternative methodology for reporting discounts; and if not, 3) reconsideration to allow an alternative methodology.

18. Primarily, the Petitioners argue that various conventions should prohibit the

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[10] *Id.* at ¶ 8.
[11] *See Kansas Indus. Consumers v. Kansas Corp. Comm'n*, 30 Kan. App. 2d 332, 338 (2002).
[12] *Peoples Nat. Gas Div. of N. Nat. Gas Co. v. State Corp. Comm'n*, 7 Kan. App. 2d 519, 526 (1982).

Commission from requiring reporting revenue gross of discounts. The Petitioners cite the Federal Communications Commission rules, general accounting principles (GAAP and FASB), and re-iterate the rationale expounded in comments filed in the record and already considered (uncollected revenue and taxing principles).[13] The purpose of a Petition for Reconsideration is to inform the Commission and parties of mistakes in law and/or fact. While the Petitioners disagree with the Commission's conclusion pertaining to discounts, they fail to identify any actual error in coming to said conclusion. Therefore, the Commission denies reconsideration to allow Providers to report revenue net of discounts other than under the specified circumstances in the Order and clarified below.

19. The Commission attempted to reconcile the issues presented in the docket based only in part on the FCC docket *In the Matter of Policy and Rules Concerning the Interstate, Interexchange Marketplace*; *Implementation of Section 254(g) of the Communications Act of 1934, as amended,* and *1998 Biennial Regulatory Review - Review of Customer Premises Equipment And Enhanced Services Unbundling Rules in the Interexchange, Exchange Access And Local Exchange Markets* at ¶¶50-52, CC Docket Nos. 96-61, 98-183 (Mar. 22, 2001) (FCC Bundled Service Order) while at the same time maintaining consistency with previous Commission orders. The Commission can appreciate the requests for clarification because by handling the issues separately in discussion and then attempting to combine the analysis for purposes of the ordering clauses, the Commission's intent was lost. The confusion appears to lie with paragraph 19 and ordering clause A of the Order combined, with the overall intertwining nature of discounting and bundling services.

[13] *See e.g.*, Petition for Reconsideration at ¶ 12 (Nov. 3, 2015), Petition for Reconsideration of Cox Kansas Telecom, LLC at ¶ 10 (Nov. 4, 2015), Petition for Reconsideration of T-Mobile Central LLC at ¶¶ 10, 11 (Nov. 4, 2015).

20. The Commission has previously ordered that Providers shall report the stand-alone price for assessable services for KUSF purposes when those services are bundled with non-assessable services.[14] To expand on the previous requirement, the Commission adopts, as reasonable, the FCC safe harbor provisions for allocation of the assessable vs. non-assessable services when bundled together.

21. When utilizing the safe harbors, the Commission intended for Providers to recognize discounts because neither method allows a Provider to arbitrarily allocate discounts—the crux of the concern raised in the docket. This is consistent with paragraph 18 which states that when the product offerings consist only of KUSF assessable service(s), discounts can be recognized. Thus when reporting the stand-alone price under the safe harbor methods, the end-user discounts may be applied and the stand-alone price reported net of the end-user discounts. To illustrate, if a Provider offered a KUSF assessable service (Service A) at a stand-alone price of $30.00 and offered a 10% discount to members of group EG, then a member of EG would pay $27.00 for their service and the Provider may report $27.00 in KUSF assessable revenue. If the same provider offered Service A bundled with non-assessable Service X (a $30.00 value) at a discounted bundled cost of $50.00, then a member of EG would pay $45.00 for their bundled services (a $60.00 value). The Commission intended to put the safe harbor stand-alone reporting methodology on par with the stand-alone purchase. Therefore, the Provider would report the $30.00 stand-alone price net of the EG member discount of 10% and report the same $27.00 in KUSF assessable revenue. A Provider shall not subtract the $10.00 bundle discount, recognized by purchasing the bundle, from the stand-alone price.[15]

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[14] Order at 2-3, In the Matter of a General Investigation Into Procedures for Recording and Reporting Kansas Universal Service Fund Revenues for Assessment Purposes, No. 03-GIMT-932-GIT (Sep. 02, 2003).

[15] This was made clear in paragraph 19 and ordering clause A. The distinction between the allowance for end-user discounts and the prohibition to applying bundle discounts was not made clear.

22. If a Provider does not elect to assign a stand-alone price but instead reports the entire bundle price, the discounted bundled service price *and* the end-user discounts may be recognized.

23. If a Provider elects to utilize an alternative methodology, as allowed, for reporting bundled services where the bundle is comprised of assessable and non-assessable services, no *end-user* discounts may be allocated or recognized on KUSF assessable services. The Provider still gets the benefit of reporting the allocated discounted bundle revenue but the concern raised in this docket is alleviated by not allowing Providers to arbitrarily attribute end-user discounts to KUSF assessable services.

24. The Commission denies reconsideration to allow an alternative methodology for allocating and reporting end-user discounts beyond the Commission's clarified intent as so stated above. The Commission was presented with concerns over the KUSF reporting methodologies and chose to address those concerns with an Order that applies to all Providers. Prior to the issue being raised, Providers adopted their own methodology to allocate discounts. This loose structure led to the concerns raised in the docket. To allow Providers to adopt their own methodology would be a de facto rescission of that portion of the Order.

T-Mobile's Statutory Allegation

25. K.S.A. 66-2008(a) provides,

> The commission shall require every telecommunications carrier, telecommunications public utility and wireless telecommunications service provider that provides intrastate telecommunications services and, to the extent not prohibited by federal law, every provider of interconnected VoIP service, as defined by 47 C.F.R. § 9.3 (October 1, 2005), to contribute to the KUSF on an *equitable and nondiscriminatory basis.*

(emphasis added).

26. T-Mobile has alleged that the Commission's Order unfairly discriminates against Providers who offer bundled services.[16] T-Mobile also raises the question of whether the Commission Order intrudes on federal law by over-assessing intrastate revenues to the detriment of interstate or federal assessable revenues.[17] While T-Mobile comes up short in making a full legal argument alleging that Commission violated established law, the Commission will address the allegations.

27. The logic of the discrimination allegation is flawed because the Commission's Order applies to all Providers. The Commission did not make any finding concerning any individual Provider's service offerings. The decision to discount or bundle various market offerings is a business decision. All Providers are subject to the same reporting methodologies determined in the Order regardless of how they structure their consumer product offerings. The Commission's Order is an attempt to bring consistency to KUSF contribution in light of concerns brought to the Commission's attention.

28. Furthermore, the Commission's Order does not discriminate against Providers who offer bundled services because those Providers may still recognize discounts so long as they utilize the reporting methodologies established in the Order and clarified herein.

29. Per T-Mobile's concern over alleged dual assessment, the Commission accepts Staff's recital in its R&R that the allocations between the KUSF and FUSF is essentially a non-issue. The Commission is comfortable with the fact that revenues may be assigned and allocated amongst the jurisdictions in such a fashion as to alleviate concern over dual or over assessment for KUSF purposes.

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[16] Petition for Reconsideration of T-Mobile Central LLC at ¶ 7 (Nov. 4, 2015).
[17] *Id.* at ¶ 6.

T-Mobile and U.S. Cellular Request for Additional Proceedings

30. T-Mobile and U.S. Cellular request additional proceedings in this docket upon the questions posed.[18] T-Mobile and U.S. Cellular claim that there is insufficient evidence in the record to support the basis and rationale for the Order.[19] The two parties do not fully brief the issue under a 'substantial competent evidence' standard. Nonetheless, the Commission will address the concerns.

31. On December 19, 2013, Ms. Sandra Reams, on behalf of Staff, entered testimony upon the record. Therein, she alluded to GVNW's concerns and attached a memorandum from GVNW.[20] In both documents, the concern was raised that certain providers were not complying with Commission requirements regarding reporting methodologies.[21]

32. The Commission, in its Order Soliciting Comments, requested that the Parties address the concerns raised by Staff and GVNW.[22]

33. The assertion or allegation of non-compliance or questionable practice was noted again in Staff's R&R.[23] The Parties were afforded the opportunity to respond to Staff's R&R.[24]

34. The Commission based its Order Soliciting Comments on the testimony and evidence filed in the docket. The Parties had ample time to make their arguments and supplement the record as they so desired. No Party, at any time prior the Commission's Order, requested that the Commission order additional proceedings. In essence, the docket advanced under the

[18] *Id.* at ¶ 13; Petition for Reconsideration of the Commission's October 20, 2015 Order Determining KUSF Contribution Methodology at ¶ 8 (Nov. 4, 2015).
[19] Petition for Reconsideration of T-Mobile Central LLC at ¶ 9 (Nov. 4, 2015), Petition for Reconsideration of the Commission's October 20, 2015 Order Determining KUSF Contribution Methodology at ¶ 8 (Nov. 4, 2015).
[20] Direct Testimony of Sandra K. Reams on Behalf of the Kansas Corporation Commission Staff at 32-33, Exhibit SKR-2 (Dec. 19, 2013) [hereinafter Reams Test.].
[21] Reams Test. at 33, Exhibit SKR-2 at 3.
[22] Order Soliciting Comments at B and C.
[23] Staff R&R at 5.
[24] Order Soliciting Comments at D.

acquiescence that the Commission had the authority to proceed informally upon the pleadings and that the record was adequately supported to the appropriate evidentiary standard.

35. T-Mobile and U.S. Cellular's request for additional proceedings is denied.

Staff's Alternative Proposal

36. In Staff's response to the Petitions for Reconsideration, Staff raised the possibility of adopting an additional methodology for allocating and recognizing discounts. Staff's alternative is predicated on the Commission choosing to allow allocation of end-user discounts amongst assessable and non-assessable service revenues within a bundle. To the extent the clarification in paragraphs 20-24 *supra* do not encompass Staff's suggestions, the Commission having denied reconsideration to allow additional alternative methodologies, will not take up analysis of Staff's recommendation at this stage in the proceeding.

THEREFORE, THE COMMISSION ORDERS:

A. Sprint's Petition for Reconsideration is denied upon the grounds stated in paragraphs 17-24 *supra.*

B. AT&T's Petition for Clarification and/or Limited Reconsideration is denied upon the grounds stated in paragraphs 17-24 *supra.*

C. Petition for Reconsideration of Cox Kansas Telcom, LLC is denied upon the grounds stated in paragraphs 17-24 *supra.*

D. Petition for Reconsideration of T-Mobile Central LLC is denied upon the grounds stated in paragraphs 17-35 *supra.*

E. U.S. Cellular's Petition for Reconsideration of the Commission's October 20, 2015 Order Determining KUSF Contribution Methodology is denied upon the grounds stated in paragraphs 17-24 and 30-35 *supra*.

F. This Order constitutes final agency action.[25] Any request for review of this action shall be in accordance with K.S.A. 77-613. Amy L. Green, Secretary to the Commission, is the proper party to receive service of a petition for judicial review on behalf of the Commission.[26]

G. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further orders as it deems necessary.

BY THE COMMISSION IT IS SO ORDERED.

Albrecht, Chair; Emler, Commissioner; Apple, Commissioner

Dated: DEC 0 3 2015

Amy L. Green
Secretary to the Commission

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[25] K.S.A. 77-607(b)(1).
[26] K.S.A. 77-529(d)

CERTIFICATE OF SERVICE

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I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

Electronic Service on DEC 0 3 2015.

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