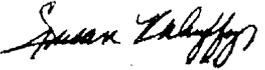


BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian Moline, Chair
Robert E. Krehbiel, Commissioner
Michael C. Moffet, Commissioner

AUG 28 2006

 Docket Room

In the Matter of a General Investigation into)
The Commission's Telephone Billing) Docket No. 06-GIMT-187-GIT
Practices Standards)

**COMMENTS OF THE
CITIZENS' UTILITY RATEPAYER BOARD**

COMES NOW the Citizens' Utility Ratepayer Board ("CURB") and files the following comments in this docket related to the Kansas Corporation Commission's ("KCC" or "Commission") June 26, 2006, Order soliciting comments regarding Staff's proposed revisions to the Commission's telephone billing practices standards ("standards").

I. INTRODUCTION

1. CURB filed initial and reply comments in this docket. In initial comments CURB stated¹,

On or about March 30, 2004, the National Association of State Utility Consumer Advocates ("NASUCA")² filed a Petition for Declaratory Ruling with the FCC in CC Docket No. 98-170 ("NASUCA Petition")³. CURB is a member of NASUCA

¹ Comments of the Citizens' Utility Ratepayer Board, p. 2, Para. 3.

² NASUCA is a voluntary, national association of 44 consumer advocates in 42 states and the District of Columbia, organized in 1979. CURB is a member of NASUCA. NASUCA's members are designated by the laws of their respective states to represent the interests of utility consumers before state and/or federal regulators and in the courts. Members operate independently from state utility commissions, as advocates primarily for residential ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). Associate and affiliate NASUCA members also serve utility consumers, but have not been created by state law or do not have statewide authority.

³ National Association Of State Utility Consumer Advocates' Petition For Declaratory Ruling, *In the Matter of Truth-In-Billing and Billing Format*, CC Docket No. 98-170. See, http://gullfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6516085825.

and supports the positions taken by NASUCA on billing issues. The NASUCA Petition addressed many of the issues under consideration in this docket. In its Petition, NASUCA stated:

To be clear, NASUCA is not asking the Commission to overturn prior decisions allowing carriers to recover specific assessments mandated by regulatory action through line item charges. Rather, NASUCA is asking the Commission to declare that carriers are prohibited from imposing line items *unless those charges are expressly mandated by federal, state or local regulatory action*. NASUCA is also asking the Commission to declare that line items allowed must closely match the regulatory assessment.⁴

2. In reply comments CURB addressed the threshold issue of whether the proposed billing standards will or should apply to wireless carriers. CURB provided extensive support for the position that the proposed rules should apply to wireless carriers.⁵ On July 31, 2006, the Eleventh Circuit Court of Appeals issued a decision confirming CURB's position regarding the applicability of billing standards to wireless carriers and addressing the authority of states to require or prohibit the use of line items.⁶ The Eleventh Circuit decision states in part,

On the key issue, we grant the petitions for review because we conclude that the Commission exceeded its authority when it preempted the states from requiring or prohibiting the use of line items. The scope of federal authority to regulate "rates" or "entry" does not include the presentation of line items on cellular wireless bills. 47 U.S.C. § 332(c)(3)(A). This billing practice is a matter of "other terms and conditions" that Congress intended to be regulable by the states. *Id.*⁷

3. This Court ruling affirms CURB's assertions that billing standards should apply to wireless carriers and affirms that states do have the authority to require or prohibit the use of line items. CURB urges the Commission to exercise this authority by applying these billing standards to wireless carriers in Kansas.

⁴ Petition for Declaratory Ruling, CC Docket No. 98-170, p. vii (emphasis in original).

⁵ Reply Comments of the Citizens' Utility Ratepayer Board, para. 8-10 (November 18, 2005).

⁶ *National Association of State Utility Consumer Advocates v. F.C.C.*, ___F.3d___, 2006 WL 2105992, 19 Fla. L. Weekly Fed. C 860, C.A. 11 (July 31, 2006).

⁷ *Id.*, at p. 6.

II. SPECIFIC RESPONSES TO STAFF'S PROPOSED REVISIONS

4. In this section CURB will respond to specific revisions recommended by Staff. At the beginning of each sub-section, CURB cites the standards proposed by Staff. CURB's non-substantive suggested changes (for clarity only) to the standards proposed by Staff are indicated in brackets. CURB's substantive suggested changes to the standards proposed by Staff are addressed in the narrative following the proposed standard. In the event that further proceedings are called to discuss these issues, CURB reserves the right to modify its position and / or to comment on issues not directly addressed in these comments.

A. Definitions

Local Service Charges

A local service provider's charge for service which allows the customer to complete calls within the local service area (dial tone), plus any local service provider charges for calling, line or directory service features (such as Caller ID, extra directory listings, touch tone service, etc.). Does not include toll, directory advertising, inside wire maintenance, etc.

5. CURB opposes this definition. Vertical features, such as Caller ID, extra directory listings, touch tone service, etc., should not be included in the definition of Local Service Charges. Including charges for these services in the definition of Local Service Charges will result in the disconnection of dial tone (universal service) for the nonpayment of vertical services, since Local Service Charges are deniable charges under the definition of Deniable Charges. Access to dial tone, or basic universal service, should not be denied for non-payment of vertical services. As a result, CURB recommends that the definition of Local Service Charges be amended to state:

Local Service Charges

A local service provider's charge for service which allows the customer to complete calls within the local service area (dial tone).

B. Section I.A.(1) – Billing Frequency

The standard billing period is monthly from billing date through [the] day before [the] next billing date. Carriers may deviate from [the] standard upon customer request.

6. CURB recommends that it be made explicit that no additional “billing” charges should be imposed on customers that choose monthly billing and that the following sentence be added to the end of the standard:

In no instance should customers be charged extra for agreeing to standard billing.

C. Section I.A.(3)(a) – Billing Period and Due Date

7. CURB remains concerned about the time customers are given to pay their bill. Obviously bills take time to get through the mail and take time to be paid and returned. If a provider is claiming a bill is overdue it would be helpful to consumers to know when the bill was actually mailed to them. Section II.A. states, “Subscriber must receive bill no later than twenty (20) calendar days before payment [due] date.” However, in the case of a dispute, with no stated mailing date, how can the consumer be assured adequate time was given to pay the bill? Until and unless CURB’s concern is addressed, the requirement for an approximate mailing date should be re-inserted in this section.

D. Section I.A.(3)(b)- Itemized Services, Service Changes and Charges

Each recurring and non-recurring service and its corresponding charge to which the customer subscribes shall be itemized and accompanied by a brief, clear, plain language definition. Packaged or bundled service shall be listed on the bill by package or bundle name with each service provided in the package or bundle itemized listed (sic). Service changes must be included in the first bill after the change. Each toll call shall be itemized and include the date, destination city and telephone number called. Details of calls included in a (sic) block of time and unlimited calling plans are excluded from this itemization requirement, however, itemized call detail must be available to the subscriber upon request at no charge.

8. It is precisely because of increased customer dissatisfaction with end user bills that this docket is so important. Itemizing and explaining charges is the first step toward billing clarity and increased customer satisfaction. Bundling charges without providing brief, clear definitions of charges must be eliminated or reduced to the greatest extent possible. CURB supports this language.

E. **Section I.A.(3)(c)—Taxes, Fees and Surcharges**

Each federal, state, local government and regulatory tax, fee and/or surcharge, elected by the carrier to be recovered from their subscribers, shall be itemized on each bill. These line-item charges shall be identified through standard and uniform labels. Federal related line items as referenced by the Federal Communications Commission on its Consumer & Governmental Bureaus' home page are "Subscriber Line Charge," "Federal Universal Service Fund," "Local Number Portability," Federal Excise Tax, and Federal Tax. Line item charges associated with state and local governmental agencies are; city and county taxes, city franchise fee, Kansas Universal Service Fund and 911. These charges cannot be higher than what has been allowed the incumbent carrier. Only those taxes, fees and surcharges noted above can be itemized. All other charges shall be included in service rates.

9. CURB consistently supported this recommendation in Initial Comments and Reply Comments. The imposition of fees that are deceptive, misleading, unclear, unsupported and cause consumer confusion must be clearly addressed and eliminated.

10. An example is Docket No. 06-SAGT-1031-TAR, in which Sage Telephone Co. ("SAGE") sought to implement a "Public Switched Network Recovery Charge," that it represented was "intended to recover costs to access the public switched network for local service."⁸ CURB opposed this surcharge on the grounds it was deceptive, misleading, a disguised rate increase, failed to disclose the true nature of the surcharge, misled ratepayers as to

⁸ Sage Local Exchange Tariff, 1st Revised Page No. 21, Replacing Original Page No. 21, KCC Docket No. 06-SAGT-1031-TAR (March 23, 2006). See, <http://www.kcc.state.ks.us/scan/200603/20060323152217.pdf>.

the actual rate being charged by Sage, and prevented ratepayers from making accurate and meaningful comparisons of Sage's rates to the rates of other carriers.

11. In its pleadings, Sage admitted a rate increase was necessary because of increased costs, but argued it was "competitively impossible for Sage to initiate a general rate increase" because its competitors had implemented similar surcharges.⁹ Sage further disclosed that the Public Switched Network Recovery Charge covered not only wholesale rate increases for access lines, but also covered other cost increases, such as high costs for employee benefits.¹⁰ In spite of these admissions, the Commission approved Sage's tariff filing, holding it was "a policy decision that is appropriately made in a generic docket, in which all similarly situated companies are parties and decisions apply to all parties."¹¹

12. These and similar surcharges mislead consumers as to the actual cost of service provided by individual carriers. Informal discussions between CURB and Sage suggest that Sage supports efforts to create an even playing field by eliminating surcharges that are not mandated by state, federal or local agencies.

13. To prevent such filings in the future, and to put all carriers on an equal basis, CURB supports the proposed language, and urges the Commission to adopt this language to prevent carriers from disguising the actual rate they are charging ratepayers.

⁹ Sage Reply to Staff Response to Petition for Reconsideration, ¶ 2, KCC Docket No. 06-SAGT-1031-TAR (June 9, 2006).

¹⁰ *Id.*

¹¹ Order Addressing Citizens' Utility Ratepayer Board's Petition for Reconsideration, Staff's Motion to Strike and CURB's Response to Staff's Motion to Strike, ¶ 9, KCC Docket No. 06-SAGT-1031-TAR, (July 26, 2006).

F. Section I.A.(3)(i)—Notice of Late Payment Charge

If a company assesses late payment charges, each bill must include the amount of the late payment charge. (See Section II.F. for late payment charge rules.)

14. CURB supports this recommendation. For consumers to make proper decisions they need adequate information.

G. Section I.A(3)(k)—Deniable and Non-Deniable Charges

Deniable charge is the total amount of the local service charges that if not paid could result in the suspension and/or disconnection of local service (dial tone). Non-deniable special charges for services such as the sale of merchandise, inside wire maintenance plans, directory advertising, long distance calls, etc. can also be included on the consumer's bill. Carriers must clearly and conspicuously identify that non-payment of these charges will not result in the disconnection of basic local service. See Definition Section under "Local Service Charges".

15. CURB supports this recommendation. Giving telephone companies special authority to disconnect basic local service for non-payment of products and services not considered an essential part of basic telephone service, places consumers at risk for losing vital telephone service.

H. Section I.B—Alternative Billing Format

If approved by the subscriber, a telecommunications public utility may provide a bill through [an] alternative means (e.g., electronic billing). Upon request a paper copy of the subscriber's bill must be provided at no charge.

16. CURB supports this recommendation. However, in all instances, there must be at least one billing option, acceptable to the customer, without charge.

I. Section I.D—High Toll Pre-Billing

(1) A telecommunications public utility may utilize high toll pre-billing only when:

...

(b)Toll usage is at least double the previous 3-month average levels or the subscriber's provided estimate and above the amount of deposit held, but in no event if usage is less than one hundred dollars (\$100).

17. Curb does not oppose this recommendation but suggests the following language for clarification:

(b)Toll usage is above the amount of deposit held and (i) at least double the previous 3-month average levels or (ii) above the subscriber's provided estimate, but in no event if usage is less than one hundred dollars (\$100).

J. Section I.E—Refunds for Service Outages (Repair)

The telecommunications public utility shall make a pro rate (sic) [rata] adjustment or refund of the local service charges if a subscriber's service remains interrupted more than 24 hours after reported. An adjustment or refund is not required if interruption is caused by negligence or willful act of the customer, the customer does not provide access necessary for the restoration or the pro rata amount is than \$1.00. The adjustment or refund shall be credited no later than the 2nd subsequent bill. See II. G regarding refunds for suspensions for non-payment.

18. CURB supports this section but recommends that the definition of an interruption include other recurring problems such as unacceptable noise levels, slow dial tone and dropped or disconnected calls.

K. Section I.H[G]—Negative Selection

Subscribers must affirmatively request a change or addition to their service. A telecommunications public utility may not use negative selection. [A] Carrier can not provide service/s at a discounted rate that would later be billed at the standard rate absent customer initiation to cancel the service. The carrier must discontinue the promotional service unless they obtain the customer's consent.

19. CURB supports the intent of this section, but recommends the standard be reworded to state:

Subscribers must affirmatively request a change or addition to their services that would result in additional charges. A telecommunications public utility shall not use negative selection to change or add to a subscriber's service, including but not limited to providing service/s at a discounted rate that would later be billed at the standard rate absent customer initiation to cancel the service. The carrier must discontinue any promotional services provided for free unless it obtains the customer's consent to be charged for the service/s.

L. Section I.I(1)(a)—Subscriber Rate Information

Subscribers must be notified on or before the date on which an increased rate goes into effect. Notice must be conspicuously placed and highlighted if provided by direct mail, bill notice or bill insert. Newspaper notification [is] only allowed if [the] rate increase could affect the general public. A copy of the subscriber notice should be retained for at least six (6) months for possible Commission review.

20. Customers need timely, accurate data to make wise purchasing decisions. Getting notice of a rate change on the day the bill is delivered does not give consumers adequate time to price compare with other providers. CURB recommends at least a five day notice before rates are increased but otherwise supports the proposed standard as written.

M. Section II.A—Payment Due Date

[The] Date by which service is subject to suspension or disconnection if payment [is] not received.

(1). Subscriber must receive bill no later than twenty (20) calendar days before payment [due] date.

(2). Subscriber must receive written suspension notice seven (7) calendar days before suspension.

21. CURB notes there is no mention of late payment charges that may be incurred if the payment due date is missed. Subject to further explanation of Staff's intent, CURB recommends late payment charges be included in this proposed standard. CURB also recommends that the word "due" be added to subsection 1 to clarify the proposed standard and for consistency with I.A.3.a.. CURB therefore recommends Section II.A be amended to state:

The Date by which service is subject to suspension, disconnection, or late payment charges if payment is not received.

- (1). *Subscriber must receive bill no later than twenty (20) calendar days before payment due date.*
- (2). *Subscriber must receive written suspension notice seven (7) calendar days before suspension.*

N. Section II.F—Late Payment Charge

A Commission approved late payment fee, no greater than three percent (3%) of the unpaid balance, not previously assessed a late fee, may be added to the subscriber's bill. Notice of the possibility of a late payment fee shall permanently appear on all subscriber bills. The company may charge a disconnect notice fee in lieu of a late payment fee, however, the notice fee must be based upon the cost. A late payment fee does not apply to installment payments that are made on time.

22. CURB endorsed many of the elements of this proposed standard and supports the language as proposed.

O. Section II.G—Billing During Suspension of Service

During the time a subscriber's service is suspended, the charges associated with the suspended services cease and resume only upon restoration or reconnection of service.

23. CURB supports the language as proposed.

P. Section II.I—Delayed Billing

Unless agreed to by the subscriber, she/he is not responsible for delayed or back billed charges for service furnished more than three (3) months immediately preceding the date of the bill, except for services obtained through fraud, as defined in Section IV.A.(l)(e). Carriers can petition to bill outside 3 months (see II. I. (2) [)].

24. CURB would expect delayed billing to be the exception and not the rule. However, CURB supports the language as proposed.

Q. Section IV.D(3)—Notice Information Requirements

The suspension/disconnection notice shall contain the following information:

- (a) The name, billing address and telephone number(s) of the subscriber being suspended.**

- (b) **A clear and concise statement of the reason for the proposed suspension/disconnection of service and terms under which suspension/disconnection may be avoided.**
- (c) **The date and time by which payment is required to avoid suspension / disconnection.**
- (d) **A clear and concise explanation of the charges and conditions for reconnection of service.**
- (e) **A statement that suspension may be postponed or avoided if the subscriber makes payment arrangements with the company for moneys not in dispute.**
- (f) **A clear and concise statement to apprise the subscriber of the availability of an administrative procedure that may be utilized in the event of a bona fide dispute or under other circumstances, such as provided in Section IV. G. The address, telephone number and name of the company office or personnel empowered to review disputed bills, rectify errors, and prevent suspension, shall be clearly set forth. The notice shall state that the subscriber may talk with an employee of the company and may present his or her reasons for disputing a bill, requesting payment arrangements or requesting a postponement of suspension. The notice shall contain the telephone number of the Commission's Consumer Protection Office.**

25. CURB supports this standard. It is vital that consumers be made aware of avenues available to them in potentially disagreeable situations. In particular, as CURB supported in Reply Comments, the inclusion of the phone number and title of the Commission's Consumer Protection Office is not overly burdensome and provides valuable consumer information.

R. Section VI—Waiver of Requirements

The requirements contained in these standards may be waived on an individual case basis by the Commission upon application by the telecommunications public utility and a showing that a waiver is in the public interest.

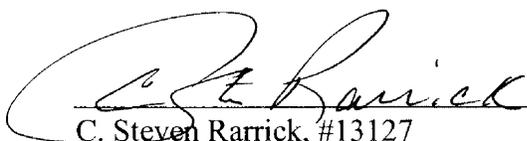
26. Certain parties opposed the public interest standard in this section and complained it does not balance the interests of the customer and the telecommunications public utility. CURB disagrees. All parties have had adequate time to participate in the development of these

proposed billing standards. At the time billing standards are approved by the Commission they will be approved based on the Commission's authority that balances the interests of the industry and consumers. Thereafter, if a company seeks a waiver of any standards, by default they are seeking to shift that balance in the company's interests. To maintain balance the Commission must look to the public interest to insure that not only the provider's interests, but also the public's interests are adequately protected. CURB supports the standard as stated.

III. CONCLUSION

27. CURB appreciates the opportunity provided in this docket to submit comments on behalf of Kansas small business and residential ratepayers regarding the development of accurate, timely and concise consumer bills.

Respectfully submitted,



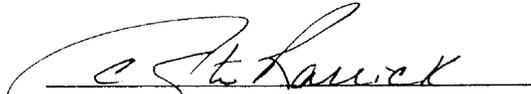
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VERIFICATION

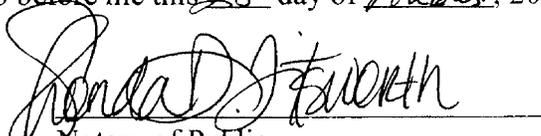
STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

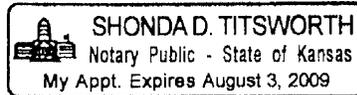
That he is an attorney for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 28th day of August, 2006.


Notary of Public

My Commission expires:
8-03-09



CERTIFICATE OF SERVICE

06-GIMT-187-GIT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 28th day of August, 2006, to the following:

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