

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of a Petition to Eliminate Any )  
Commission Requirement to Distribute ) Docket No. 24-GIMT-380-MIS  
Annually a Printed Directory. )

**JOINT STAFF AND RLEC PROPOSED REPLACEMENT FOR 1967 DIRECTIVE  
REGARDING DIRECTORIES**

COME NOW the Rural Local Exchange Carriers (“RLECs”)<sup>1</sup> and the Staff of the State Corporation Commission of the State of Kansas (“Staff”) and for their joint proposed replacement of any existing Commission requirement to distribute annually a printed directory, state as follows:

1. Given that several RLECs are facing or will soon be facing a decision whether to enter into a contract to print directories for upcoming years, on March 11, 2024, the RLECs proposed the Commission adopt an RLEC proposed replacement for the Commission’s 1967 Directive to annually issue dated telephone directories. These costs can run into thousands of dollars. The RLECs proposed immediate relief.

2. After conferring with Staff, the RLECs and Staff propose the following joint proposed replacement of any current requirement to annually distribute a dated directory, as contained in the 1967 “Directive.”

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<sup>1</sup> The “RLECs” are the following companies: Blue Valley Tele-Communications, Inc., Columbus Communications Services, LLC, Craw-Kan Telephone Cooperative, Inc., Cunningham Telephone Co., Inc., Golden Belt Telephone Association, Inc., Gorham Telephone Co., Inc., H&B Communications, Inc., Haviland Telephone Co., Inc., Home Telephone Co., Inc. JBN Telephone Company, Inc., KanOkla Telephone Association, LaHarpe Telephone Co., Inc., Madison Telephone, LLC, Moundridge Telephone Co., Inc., Peoples Telecommunications, LLC, Pioneer Telephone Association, Inc., Rainbow Telecommunications Association, Inc., Rural Telephone Service Co., Inc. d/b/a Nex-Tech, S&A Telephone Co., LLC, S&T Telephone Cooperative Association, Inc., South Central Telephone Association, Inc., Southern Kansas Telephone Co., Inc., Totah Communications, Inc., Tri-County Telephone Association, Inc., Twin Valley Telephone, Inc., United Telephone Association, Inc., Wamego Telecommunications Co., Inc., Wilson Telephone Co., Inc., and Zenda Telephone Co., Inc.

3. As requested in the Petition to open this general investigation, the Staff joins with the RLECs request that the Commission allow the RLECs to make directories available to subscribers in any format or manner an individual RLEC deems most cost-effective, including electronic or web-based form, and provide to any subscriber, upon request, a simple paper/PDF copy of directory information. Staff and the RLECs agree that if an individual RLEC wishes to continue to distribute a formal bound and printed directory it may do so at its discretion.

4. Staff and the RLECs propose that each RLEC, at least 90 days' prior to ceasing the distribution of a printed directory to every subscriber, announce the cessation to all of their subscribers through bill messages, bill inserts, and other methods including website announcements and social media messaging.

5. Staff and the RLECs propose that the message to subscribers include information on (1) how to access any online or electronic directory, and (2) how to request a paper copy of the directory from the RLEC.

6. Staff and the RLECs propose that the message to subscribers also include information on how they can communicate with the RLEC, and if a subscriber chooses, the Commission.

7. Staff and the RLECs agree that when new customers subscribe to RLEC service, the RLECs will inform new customers that they will not be receiving a printed directory, and will provide the new customer with information on how to access an online directory or obtain a printed directory upon request.

8. Staff and the RLECs agree that for RLECs choosing to cease distributing directories, annual reminders will be provided to end users that no directory will be provided and the customer may request a printed directory.

WHEREFORE, Staff and the RLECs request the Commission (1) eliminate any requirement currently existing that mandates RLECs physically print and distribute a telephone directory to subscribers; and (2) allow RLECs to provide directories in any format or manner an individual RLEC deems most cost-effective, including electronic or web-based, and provide a simple paper/PDF copy to subscribers upon request, in accordance with the measures described above and for such other and further relief as the Commission deems just and equitable.

Respectfully submitted,

JAMISON LAW, LLC

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Mutual Telephone Company  
Peoples Telecommunications, LLC  
Pioneer Telephone Association, Inc.  
Rainbow Telecommunications Assoc., Inc.  
S&A Telephone Co., LLC  
S&T Telephone Coop. Assoc., Inc.  
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Totah Communications, Inc.  
Twin Valley Telephone, Inc.  
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**VERIFICATION**

I, the undersigned, hereby certify under penalty of perjury pursuant to K.S.A. 53-601 that I am an attorney for the companies listed above and that the foregoing is true and correct. Executed on August 15, 2024.

*Colleen R. Jamison*

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Colleen R. Jamison

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the above and foregoing was sent via electronic mail this 15th day of August 2024, to the entities listed on the Commission's service list as last modified August 8, 2024, addressed to the following:

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