

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. )

**RLEC RESPONSE TO STAFF REPLY TO THE RLEC PROPOSED PROCEDURAL  
SCHEDULE AND MOTION TO ADOPT PROPOSED PROCEDURAL SCHEDULE**

COME NOW the Rural Local Exchange Carriers (“RLECs”)<sup>1</sup> and for their response to the Staff Reply to the RLEC Proposed Procedural Schedule and Motion to Adopt Proposed Procedural Schedule, state as follows:

1. On August 8, 2024, Commission Staff (“Staff”) filed its reply to the RLEC Proposed Procedural Schedule and Motion to Adopt Proposed Procedural Schedule.
2. The August 8 Staff reply fails to address any RLEC statement within the RLEC August 6 motion regarding Staff failure to reply to a) the RLEC’s initial request for a general investigation, b) the RLEC’s informal request four months later to request Staff to collaboratively address a possible solution, or c) the RLEC’s filed proposed resolution.
3. After the prehearing conference date and time was determined the presiding officer emailed the undersigned counsel that a “Zoom link” would be distributed “well before” the meeting.

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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.

4. No Zoom link was provided to any of the counsel for the RLECs by any Commission Staff member at any level.

5. The Staff motion also states that “Staff was not consulted regarding their [sic] availability or agreeance regarding these proposed dates.”

6. The RLECs find it curious that Staff would take offense at a failure to communicate, given that the RLECs have three times in this proceeding requested communication from Staff with no response. The RLECs also note that the Commission failed to provide counsel for the RLECs the promised Zoom link for the prehearing on August 6. The RLECs also note that Staff failed to contact counsel for the RLECs regarding the Staff proposed procedural schedule prior to submitting it, thereby doing to the RLECs what Staff complained of.

7. The RLECs also note that the prehearing officer requested the RLECs to “propose a procedural schedule.” The prehearing officer did not request the RLECs to “consult with Staff and then after consultation with Staff, propose a joint procedural schedule.”

8. Staff proposes it be given until October 18, 2024, to file testimony or a report and recommendation. Given that this date is 347 days after the initial RLEC filing and 220 days after the RLEC proposed resolution was filed, the Staff request to further delay action until mid-October is unreasonable and unwarranted and should be rejected.

WHEREFORE, the RLECs move the Commission to adopt the proposed procedural schedule, and for such other and further relief as the Commission deems just and equitable.

Respectfully submitted,

JAMISON LAW, LLC  
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Pioneer Telephone Association, Inc.  
Rainbow Telecommunications Assoc., Inc.  
S&A Telephone Co., LLC  
S&T Telephone Coop. Assoc., Inc.  
South Central Telephone Assoc., Inc.  
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United Telephone Association, Inc.  
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Moundridge Telephone Co., Inc.  
Rural Telephone Service Co., Inc., d/b/a  
Nex-Tech

Southern Kansas Telephone Co., Inc.  
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 9, 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 9th day of August 2024, addressed to the following:

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*Colleen R. Jamison*

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