

2. Paragraph 6 of the 24-380 Order creates the following conditions on an RLEC that elects to discontinue to distribute a formal bound and printed directory:

- Each RLEC will provide at least 90 days' notice before ceasing the distribution of a printed directory to every subscriber, through bill messages, bill inserts, website announcements and social media messaging, including information on (1) accessing any online or electronic directory, and (2) requesting a paper copy of the directory from the RLEC;
- The notice will also include information on how customers can communicate with the respective RLEC, or the Commission;
- The RLEC will inform new customers that they will not be receiving a printed directory, and will provide new customers with information on how to access an online directory or obtain a printed directory upon request; and
- RLECs that elect to stop distributing directories will send annual reminders to their customers that a printed directory will no longer be provided, but that the customer may request a simple paper/PDF copy of directory information.⁴

3. On December 20, 2024, Southern Kansas Telephone (“Southern”) filed a request to revise its General Exchange Tariff (“Application”).⁵ The requested tariff revisions reflect the implementation of the Commission’s Order in the 24-380 Docket and the elimination of discontinued services that are no longer provided to customers

II. Legal Discussion and Analysis

4. The Commission derives its authority to review Local Exchange Carrier tariffs from K.S.A. 66-117(d), which states in part:

....(d) Except as provided in subsection (c), no change shall be made in any rate, toll, charge, classification, or schedule of charges or joint rates, or in any rule or regulation or practice pertaining to the service or rates of any such public utility or common carrier, without the consent of the commission.

⁴ *Id.*, p. 3.

⁵ Application of Southern Kansas Telephone (Dec. 20, 2024).

K.S.A. 66-1,190 provides in part that telecommunications public utilities doing business in

Kansas shall:

... publish and file with the commission copies of all schedules of rates, joint rates, tolls charges, classifications, and divisions of rates affecting Kansas traffic, either state or interstate... and... the commission shall have power to prescribe reasonable rules and regulations regarding the form and filing of all schedules, tariffs, and classifications of all rates, joint rates, tolls, and charges and all rules and regulations of such telecommunications public utilities...

The Commission must review rates and terms for jurisdictional telecommunications services to ensure they are “just and reasonable” pursuant to K.S.A. 66-1,189. Further, K.S.A. 66-1,189 requires the Commission to ensure that all classifications, rules, and regulations regarding the services are not unduly discriminatory or preferential.

5. On January 2, 2025, Commission Staff (“Staff”) submitted its Report and Recommendation (“R&R”), attached hereto and incorporated herein.⁶

6. The Commission finds that Southern’s revisions to its tariffs are intended to implement language that the Company will make available upon request and without charge a copy of the directory to any subscriber, either in person at Company offices or on the Company’s website.⁷ Therefore, the Commission finds that Southern’s revisions to its tariffs are consistent with the Commission’s Order in the 24-380 Docket.⁸

7. Staff determined Southern’s requested revisions remove services no longer offered, including Payphone Exchange Service, Directory Listing Service, and residential and business discount bundles. Staff confirmed that there is no revenue impact resulting from the changes to

⁶ Staff’s Report and Recommendation (Jan. 2, 2025) (“R&R”).

⁷ *Id.* at p. 3.

⁸ *Id.*

Southern's tariff.⁹ Staff further confirmed that there are zero customers subscribed to the removed services.¹⁰

Therefore, Staff recommended that the Commission grant Southern's Application and approve Southern's revised tariff as requested by the company.¹¹

8. The Commission hereby adopts Staff's analysis and recommendations as contained in Staff's January 2, 2025, R&R as additional findings. The Commission finds that Southern's Application should be granted, and that Southern's tariff revisions are approved as requested. Therefore, The Commission concludes that Southern's revisions to its tariff are just and reasonable.¹²

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

- A. Southern Kansas Telephone's Application is hereby granted, and its revised General Exchange Tariff is hereby approved and shall become upon issuance of this order.
- B. Southern is directed to comply with the customer notification provisions set forth above in paragraph 2 referencing the Commission's Order in the 24-380 Docket.
- C. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).¹³

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

¹³ K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 01/23/2025



Lynn M. Retz
Executive Director

BWB

**REPORT AND RECOMMENDATION
UTILITIES DIVISION**

TO: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

From: Drennan Dolsky, Telecommunications Analyst
Steve Garrett, Deputy Chief of Telecommunications
Jeff McClanahan, Director of Utilities

DATE: January 2, 2025

SUBJECT: Docket No. 25-SNKT-249-TAR

In the Matter of the Application of Southern Kansas Telephone Filing Tariff Revisions to No Longer Provide a Printed Telephone Directory and Remove Services Which No Longer Provided.

EXECUTIVE SUMMARY:

On December 20, 2024, Southern Kansas Telephone (SNKT) filed an Application with the Kansas Corporation Commission (Commission) proposing revisions to its General Exchange Tariff. This revision will implement the Commission's August 22, 2024, Order Adopting Joint Staff and RLECs Proposed Replacement for the 1967 Directive Regarding Directories in Docket No. 24-GIMT-380-MIS (24-380 Order) and eliminate discontinued services that are no longer provided to customers. The Tariff pages impacted by this revision include the following:

- Index, 5th Revised Sheet 3
- Index, 8th Revised Sheet 4
- Section 2, 1st Revised Sheets 5-7
- Section 2, 1st Revised Sheet 9
- Section 2, 3rd Revised Sheet 11
- Section 2, 2nd Revised Sheet 14
- Section 2, 2nd Revised Sheets 25-26
- Section 3, 26th Revised Sheet 1
- Section 3, 6th Revised Sheets 7-8
- Section 3, 2nd Revised Sheets 15-18
- Section 3, 3rd Revised Sheet 19
- Section 3, 2nd Revised Sheet 20
- Section 3, Original Sheet 23

- Section 3, 1st Revised Sheet 24
- Section 3, Original Sheet 25
- Section 4, 2nd Revised Sheet 2
- Section 4, 10th Revised Sheet 3
- Section 4, 4th Revised Sheet 5
- Section 4, 3rd Revised Sheet 9
- Section 4, 9th Revised Sheets 18-19
- Section 5, Original Sheets 1-10

Staff recommends approval of this Application. The Commission action date is Thursday, August 14, 2025, due to a suspension order.

BACKGROUND

The Commission derives its authority to review Local Exchange Carrier tariffs from K.S.A. 66-117(d), which states in part:

(d) Except as provided in subsection (c), no change shall be made in any rate, toll, charge, classification or schedule of charges or joint rates, or in any rule or regulation or practice pertaining to the service or rates of any such public utility or common carrier, without the consent of the commission.

Pursuant to K.S.A. 66-1,189, the Commission must review rates and terms for every telecommunication public utility to ensure they are “just and reasonable” and that the classifications, rules, and regulations regarding the services are not unduly discriminatory or preferential.

Additionally, K.S.A. 66-1,190 requires every public utility doing business in Kansas over which the Commission has control to publish and file with the Commission copies of all schedules of rates, joint rates, tolls, charges, classifications and divisions of rates affecting Kansas traffic, either state or interstate. The Commission has the power to prescribe reasonable rules and regulations regarding the form and filing of all schedules, tariffs and classifications of all rates, joint rates, tolls and charges, and all rules and regulations of such telecommunications public utilities as the Commission determines reasonable and appropriate.

The 24-380 Order allows a Rural Local Exchange Carrier (RLEC) discretion to continue to distribute a formal bound and printed directory to subscribers. Paragraph 6 of the 24-380 Order, herein known as the “Paragraph 6 Conditions”, creates the following conditions on a RLEC that elects to discontinue to distribute a formal bound and printed directory:

- Each RLEC will provide at least 90 days' notice before ceasing the distribution of a printed directory to every subscriber, through bill messages, bill inserts, website announcements and social media messaging, including information on (1) accessing any online or electronic directory, and (2) requesting a paper copy of the directory from the RLEC;
- The notice will also include information on how customers can communicate with the respective RLEC, or the Commission;

- The RLEC will inform new customers that they will not be receiving a printed directory, and will provide new customers with information on how to access an online directory or obtain a printed directory upon request; and
- RLECs that elect to stop distributing directories will send annual reminders to their customers that a printed directory will no longer be provided, but that the customer may request a simple paper/PDF copy of directory information.

Commission Staff reserves the right to request an audit consistent with Docket No. 04-GIMT-1080-GIT.

ANALYSIS:

SNKT's Application proposes to remove its Printed Telephone Directory from its General Exchange Tariff and remove services no longer offered.

The services no longer offered include:

- Payphone Exchange Service
- Directory Listing Service
- Discount Bundles
 - Residential
 - Gold High-Speed Connection includes a Residence Access Line, Ultimate Service Package, 4.0 Mbps Internet and Voice Mail Basic
 - Double Bundle 6.0 Mbps includes a Residence Line Access, Top 7 Feature Package, 6.0 Mbps Internet, 100 Minutes Domestic U.S. Long Distance, Voice Mail Basic and Combo Maintenance
 - FTTP Double Bundle 12.0 Mbps includes Residence or Business Line Access, Top 7 Feature Package, 100 Minutes Domestic U.S. Long Distance, 12.0 Mbps Internet, Voice Mail Basic and Wire Maintenance
 - Business
 - Double Bundle 6.0 Mbps includes a Residence Line Access, Top 7 Feature Package, 6.0 Mbps Internet, 300 Minutes Domestic U.S. Long Distance, Voice Mail Basic and Combo Maintenance
 - FTTP Double Bundle 12.0 Mbps includes Residence or Business Line Access, Top 7 Feature Package, 300 Minutes Domestic U.S. Long Distance, 12.0 Mbps Internet, Voice Mail Basic and Wire Maintenance
 - Cloud Business Phone includes a Business Access Line, Cloud Business Phone Features and 1,000 Minutes Domestic U.S. Long Distance
- Radio Common Carrier Interconnection Service

The Company states that there is no revenue or customer effect as a result of these changes. The Company further stated that there are zero customers subscribing to the removed services.

Staff's review has indicated the revisions to SNKT's General Exchange Tariff are just and reasonable and consistent with the Commission's 24-380 Order.

RECOMMENDATION:

Staff recommends the Commission accept SNKT's revised General Exchange Tariff to no longer provide a Printed Telephone Directory by implementing language changes consistent with the Commission's 24-380 Order and to remove discontinued services no longer offered to customers with an effective date of January 19, 2025, as requested by the Company.

CERTIFICATE OF SERVICE

25-SNKT-249-TAR

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 01/23/2025.

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/S/ KCC Docket Room

KCC Docket Room