

COLLEEN R. JAMISON
JAMISON LAW, LLC

March 11, 2024

Lynn M. Retz, Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604

RE: Proposed resolution
Docket No. 24-GIMT-380-MIS

Dear Ms. Retz:

Attached please find a proposal on a procedure for resolution of the RLECs' petition, filed in this docket on November 6, 2023.

If you have any questions, please let me know.

Sincerely,

JAMISON LAW, LLC

Colleen R. Jamison

Colleen R. Jamison

Att.

cc: Mark Doty
Anthony Veach

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

PROPOSED REPLACEMENT FOR 1967 DIRECTIVE REGARDING DIRECTORIES

COME NOW the Rural Local Exchange Carriers (“RLECs”)¹ and for their 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, the RLECs propose the Commission adopt the 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 propose immediate relief.

2. As requested in the Petition to open this general investigation, the RLECs request the Commission allow the RLECs to make directories available to subscribers in any format or

¹ 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.

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.

3. Further, 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.

4. Additionally, 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.

5. Finally, 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.

6. The RLECs reached out to Commission Staff assigned to this docket on Thursday, March 7 requesting to work collaboratively towards next steps in this docket and, as of this filing, have had no response.

WHEREFORE, 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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Craw-Kan Telephone Cooperative, Inc.

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Haviland Telephone Co., Inc.

JBN Telephone Co., Inc.

KanOkla Telephone Association

Madison Telephone, LLC

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.

South Central Telephone Assoc., Inc.

Tri-County Telephone Assoc., Inc.

United Telephone Association, Inc.

Wheat State Telephone, Inc. d/b/a Wheat
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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.
Wamego Telecommunications Co., 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 March 11, 2024.

Colleen R. Jamison

Colleen R. Jamison

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the above and foregoing was sent via electronic mail this 11th day of March 2024, addressed to the following:

Ahsan Latif
Kansas Corporation Commission
1500 Arrowhead Rd.
Topeka, KS 66604
a.latif@kcc.ks.gov

Colleen R. Jamison

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