

COLLEEN R. JAMISON
JAMISON LAW, LLC

February 14, 2025

Amy Gilbert, Acting Secretary
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604

RE: Blue Valley Tele-Communications, Inc.
Application for Billing Standards Waiver – suspension/disconnection notices
25-BLVT-___-MIS

Dear Ms. Gilbert:

Attached for filing please find the application of Blue Valley Tele-Communications, Inc. for waiver from the Commission's Telecommunications Billing Practice Standards to be allowed to send notices of service suspension or disconnection via the described electronic means.

If you have any questions, please let me know.

Sincerely,

JAMISON LAW, LLC

Colleen R. Jamison

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Att.

cc: Angie Armstrong

applicant telecommunication provider, the interests of the affected consumer(s), and the interests of the public. (emphasis in original)

4. The standards currently require traditional “snail” mailing of notices of suspension or disconnection of service. See Final Order, Attachment 1, Section IV.D.(1) and (2). BVT requests the Commission grant BVT a waiver of this standard and allow BVT to substitute electronic mailing of notices of suspension or disconnection of service. BVT notes that the Commission has previously granted similar waivers from the standards. See Docket No. 11-RRLT-188-MIS, Docket No. 15-MRGT-110-MIS, Docket No. 25-HVDT-204-MIS, and Docket No. 25-RNBT-212-MIS.

5. When a new customer initiates BVT service, the new customer frequently initiates service via electronic means, inputting the service address where the new customer is requesting service. During all means of service initiation, the customer provides their own contact information, including a billing address if the billing address is other than the service address, email address, security questions, and information for additional authorized users. BVT’s customer service representatives then process the service order, and the customer is contacted by BVT’s dispatch department to schedule service initiation and gather any other necessary information.

6. BVT processes billing monthly and currently offers subscribers the option to choose electronic delivery of the monthly bill. Once the monthly billing occurs, BVT’s billing department receives a report noting any bounced email addresses. BVT’s customer service team then personally contacts subscribers with the invalid email addresses to correct the email address in BVT’s billing system.

7. Since 2021, BVT has annually sent the following number of notifications for regulated services provided by BVT in its regulated service area:

- 2021 – 1334
- 2022 – 1143
- 2023 – 1121
- 2024 – 1084

8. BVT's regulated service customer count for the same time period is:

- 2021 – 2572
- 2022 – 2339
- 2023 – 2149
- 2024 – 1998

9. The cost to BVT to process and mail the paper disconnect notices for the 2024 calendar year was \$943.63.

10. BVT is actively promoting both its online billing and mobile application eBill options. Based on industry statistics, it estimates at least 40% of its customers will choose to receive all billing communications, including bills and late notices, via electronic mail from BVT by the end of 2025. Granting BVT the proposed waiver from the standards is estimated to generate an additional \$8,802.65 per year of cost savings, although cost is not the primary driver of BVT's request. Indeed, the primary motivator behind actively promoting online billing methods and electronic communication methods is to expedite the delivery of the notices in that in BVT's experience the United States Postal Service has proven increasingly unreliable and subject to delays, resulting in customers not receiving bills or notices in a timely manner in order to be able to potentially rectify past due balances prior to service disconnection. Another primary driver of this request is the operational efficiencies it will provide to the company.

11. BVT's current billing system allows for the flagging and tracking of accounts that have authorized BVT to send billing and delinquent notices via electronic mail. This existing functionality would be used going forward. The system also allows BVT to run a myriad of reports.

12. BVT has attached a copy of its current paper notice. BVT proposes to use the same verbiage in its electronic mail notices of suspension of service and disconnection of service.

13. With respect to existing customers, BVT proposes to notify all current customers that suspension of service and disconnection of service will be made via electronic mail unless the customer specifically opts out (substituting for the current “opt in” process). For new customers, the option to opt out of electronic communications and notifications, and instead choose traditional paper mailed notifications, will be provided at service initiation or by calling into the BVT office.

14. In the event email or other electronic communication with the customer fails at any step, BVT will revert to mailing a paper notice of suspension or disconnection of service.

WHEREFORE, Blue Valley Tele-Communications, Inc. requests the Commission grant it the requested waiver from the telecommunications billing practice standards as set forth herein, and for such other and further relief as the Commission deems just and equitable.

Respectfully submitted,

JAMISON LAW, LLC

Colleen R. Jamison

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Attorney for Blue Valley Tele-
Communications, Inc.

VERIFICATION

Pursuant to K.S.A. 53-601, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on February 14, 2025.

Colleen R. Jamison

Colleen R. Jamison

Return Address

Address Service Requested

Send To Address



Notice Date:	Feb 14, 2025
Account Number:	Account_Number
Disconnect Date:	Feb 14, 2025
Total Amount Past Due:	\$ 1,234.56

For questions regarding this notice, call: 877.876.1228

Service: MainServiceIdentifier

PAST DUE NOTICE

This is a friendly reminder that we have not yet received your payment.

To avoid service interruption, please pay your balance in full by the end of business on the above date (see top right-hand corner of this notice) or call our office at 877-876-1228 to speak with one of our customer service representatives for a payment arrangement. BVT offers many payment options for your convenience, including ACH, online bill pay and payments over the phone.

Please disregard this notice if your payment has already been made.

Please be advised of the following items if your services are interrupted due to nonpayment:

- You may be responsible for a "breaking contract fee."
- A new deposit may be imposed upon reconnection.
- A reconnect fee may be applied.
- All BVT equipment must be returned to our Home office to avoid any equipment charges.
- There will be no 911 service tied to your landline phone.
- If you are a TechHome subscriber, your anti-virus and back-up softwares will be interrupted.
- Email, voicemails, and passwords may be lost.

Our office hours are Monday, 9am to 4:30pm, and Tuesday through Friday from 8am to 4:30pm Our office staff is waiting to serve and assist you with any questions or concerns you have regarding this notice and your account.

Respectfully,

Your Friends at Blue Valley Technologies

You may be eligible for our residence Lifeline program which would reduce your local telephone bill. Check with our Customer Service Representatives for details.

Telephone Service provided by Blue Valley Tele-Communications, Inc. is regulated by the Kansas Corporation Commission. The toll free number for the Consumer Protection Office is 1-800-662-0027.