

COLLEEN R. JAMISON  
JAMISON LAW, LLC

March 3, 2025

Abigail Emery, Acting Secretary  
Kansas Corporation Commission  
1500 SW Arrowhead Rd.  
Topeka, KS 66604

RE: Gorham Telephone Co., Inc.  
Application for Telecommunications Billing Practice Standards Waiver  
25-GRHT-\_\_\_-MIS

Dear Ms. Emery:

Attached for filing please find the application of Gorham Telephone Co., Inc. for waiver from certain provisions of the Telecommunications Billing Practice Standards.

If you have any questions, please let me know.

Sincerely,

JAMISON LAW, LLC

*Colleen R. Jamison*

Colleen R. Jamison

Att.

cc: Tonya Murphy  
Morgan Murphy  
Madison Murphy

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Gorham                    )  
Telephone Company, Inc. for a Waiver of                    )  
Certain Telecommunications Billing                         )  
Practice Standards.   )           Docket No. 25-GRHT-\_\_\_\_-MIS

**APPLCATION OF GORHAM TELEPHONE COMPANY, INC.  
FOR WAIVER OF CERTATIN TELECOMMUNICATIONS  
BILLING PRACTICE STANDARDS**

COMES NOW Gorham Telephone Company, Inc. (hereinafter “Gorham”) and submits this application to the Commission requesting a waiver of certain telecommunications billing practice standards (hereinafter “standards”). In support, Gorham shows the Commission as follows:

1. Gorham is a Kansas corporation holding one or more Certificates of Convenience and Authority to engage in the business of providing local exchange and exchange access telecommunications service in a designated service area in the State of Kansas. It is a rural telephone company as defined by K.S.A. 66-1,187(1), and it is the carrier of last resort in its designated service area. K.S.A. 66-2009(a).

2. The current standards were established by the Commission in Docket No. 06-GIMT-187-GIT, in a Final Order dated July 16, 2010, as amended by an Order on Petition for Reconsideration dated September 1, 2010.

3. In the Order on Petition for Reconsideration, the Commission added language (see para. 27) that:

The requirements contained in these standards may be waived on an individual case basis by the Commission upon application by the telecommunication

provider and a showing that a waiver is in the public interest. *In making this determination, the Commission's considerations will include the interests of the 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). Gorham requests the Commission grant Gorham a waiver of this standard and allow Gorham to substitute electronic mailing of notices of suspension or disconnection of service. Gorham 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 Gorham 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. Gorham's customer service representatives then process the service order, and the customer is contacted by Gorham's dispatch department to schedule service initiation and gather any other necessary information.

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

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

- 2021 – 243
- 2022 – 275
- 2023 – 321
- 2024 – 276

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

- 2021 – 390
- 2022 – 381
- 2023 – 369
- 2024 – 365

9. The cost to Gorham to process and mail the paper disconnect notices for the 2024 calendar year was \$549.46.

10. Gorham 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 Gorham by the end of 2025. Granting Gorham the proposed waiver from the standards is estimated to generate an additional \$600 or more per year of cost savings, although cost is not the primary driver of Gorham'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 Gorham'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. Gorham's current billing system allows for the flagging and tracking of accounts that have authorized Gorham to send billing and delinquent notices via electronic mail. This existing functionality would be used going forward. The system also allows Gorham to run a myriad of reports.

12. Gorham's current paper notice verbiage is as follows:

A friendly reminder that we have not received payment for your bill as of 12/10/2024. Payment must be received in full by 9:00am on the 20th. Failure to do so will result in suspension of service, resulting in a \$30 reconnect fee. Suspension may be postponed or avoided if you dispute charges or make payment arrangements by calling 785-637-5300. We value your business, if your payment has already been mailed, thank you.

Lifeline is a service that you can use to help pay your bill should you qualify. For consumer complaints not resolved you have the right to contact the Kansas Corporation Commission at 800-662-0027.

Gorham 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, Gorham 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 Gorham office.

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

WHEREFORE, Gorham Telephone Company, 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 Gorham Telephone Co., 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 March 3, 2025.

*Colleen R. Jamison*

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