

COLLEEN R. JAMISON
JAMISON LAW, LLC

March 10, 2025

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

RE: South Central Telephone Assoc., Inc.
Application for Waiver from Certain Telecommunications Billing Practice Standards

Dear Ms. Emery:

Attached for filing please South Central Telephone Association, Inc.'s application for a waiver from certain provisions of the Commission's Telecommunications Billing Practice Standards. If you have any questions, please let me know.

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Sincerely,

JAMISON LAW, LLC

Colleen R. Jamison

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Att.

cc: Carla Shearer
Danielle Farr
Roxie Prieb

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

In the Matter of the Application of South)	
Central Telephone Association, Inc. for a)	Docket No. 25-SCNT-___-MIS
Waiver of Certain Telecommunications)	
Billing Practice Standards.)	

**APPLICATION OF SOUTH CENTRAL TELEPHONE ASSOCIATION, INC.
FOR WAIVER OF CERTAIN TELECOMMUNICATIONS
BILLING PRACTICE STANDARDS**

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

1. SCT 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(l), 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). SCT requests the Commission grant SCT a waiver of this standard and allow SCT to substitute electronic mailing of notices of suspension or disconnection of service. SCT 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 SCT 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. SCT’s customer service representatives then process the service order, and the customer is contacted by SCT’s dispatch department to schedule service initiation and gather any other necessary information.

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

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

- 2021 – 646
- 2022 – 755
- 2023 – 1253
- 2024 – 1323

8. SCT's Kansas jurisdictional regulated service customer count for the same time period is:

- 2021 – 1143
- 2022 – 1131
- 2023 – 977
- 2024 – 874

9. The company-wide cost to SCT to process and mail paper disconnect notices for the 2024 calendar year was \$5,213.19 across all jurisdictional and non-jurisdictional services. SCT currently snail mails all paper notices in order to comply with the Kansas standards, even though the Kansas standards are not applicable to non-Kansas-regulated services or Oklahoma services of any nature. A waiver of the Kansas standards would allow significant relief to SCT.

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

12. SCT's current paper notice verbiage is attached hereto as Exhibit A. For current customers that opt in to receiving notices via text messaging, SCT's text notice verbiage is as follows:

To date, SCTelcom has not received payment for your telephone/Internet or other services. If balance is not paid in full or satisfactory arrangements are not made, your service(s) will be suspended. A \$25 reconnection fee per service will apply to restore your services. Please avoid suspension and reconnection fees by paying your bill promptly. You may reach our office at 877-723-6875, Monday through Friday from 8 a.m. to 5 p.m.

SCT 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, SCT 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 SCT office.

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

WHEREFORE, South Central Telephone Association, 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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Tecumseh, KS 66542

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FAX: 833-233-4028

colleen.jamison@jamisonlaw.legal

Attorney for South Central Telephone
Assoc., 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 10, 2025.

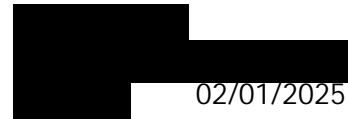
Colleen R. Jamison

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EXHIBIT A



P.O. Box Drawer B
Medicine Lodge, KS 67104
877-723-6875



REMINDER NOTICE

As of today, there is an outstanding balance on your account and a late fee of 3% has been applied. To ensure your services remain active, please make a satisfactory payment before Feb 19, 2025. If the balance is not paid in full, or satisfactory arrangements have not been made by 5:00 PM CST before the date stated above, your service(s) will be suspended. A \$25 reconnection fee per service will apply to restore your service(s). If your services are suspended, we will make every effort to restore them promptly after receiving full payment.

To help you avoid service fees and interruptions, we offer multiple payment options. You can call our secure toll-free number at (844) 937-1664 or make a payment online at <https://ebill.sctelcom.net>. If you need to make a payment arrangement due to unforeseen circumstances, please contact our office at (877) 723-6875 to speak with our customer experience specialists. We appreciate your understanding and cooperation.

If you have questions regarding this notice, you are required to contact our office at (877) 723-6875 prior to contacting the state corporate commission offices listed below.

Kansas Corporation Commission
(800) 662-0027

Oklahoma Corporation Commission
PO Box 52000-2000
Oklahoma City, OK 73152
(800) 522-8154

TOTAL PAST DUE \$ 108.50

Please return lower portion with your payment...retain upper portion for your records



PO Box Drawer B
Medicine Lodge, KS 67104
Address Service Requested

02/11/2025	
Account No:	[Redacted]
Disconnect Date:	02/19/2025




SCTELCOM
PO BOX B
MEDICINE LODGE, KS 67104