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April 13, 2015

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Amendment to 52 Pa. Code Chapter 53; Paper Billing Fees  
Docket No. L-2014-2411278

Dear Secretary Chiavetta:

We are counsel to the Pennsylvania Telephone Association (“PTA”)<sup>1</sup> and hereby submit, on behalf of the PTA, this letter in lieu of comments<sup>2</sup> to the Public Utility Commission’s (“Commission”) Proposed Rulemaking Order entered December 4, 2014 at Docket No. L-2014-2411278, in which the Commission commenced a rulemaking process to amend its existing Chapter 53 regulations for purposes of addressing the issue of paper billing fees. Specifically, the Commission has proposed the addition of a new regulation at 52 Pa. Code § 53.85 that would prohibit tariff provisions that charge customers a fee to receive a paper bill. By Notice published in the *Pennsylvania Bulletin* on March 14, 2015 (45 Pa.B. 1264), the Commission requested written comments to the Proposed Rulemaking Order by April 13, 2015.

The PTA takes this opportunity to simply reiterate the Comments it submitted in response to the Commission’s Order published in the *Pennsylvania Bulletin* on August 14, 2010 at Docket No. I-2010-2181481 regarding the Commission’s investigation into the practice of paper invoice charges and, as such, incorporates those Comments herein by reference. For the reasons set forth therein, the PTA urges the Commission to withdraw its proposal to add a new regulation at 52 Pa. Code § 53.85 prohibiting tariff provisions that impose a fee on customers for receipt of a paper bill. The Commission, instead, should grant telecommunications carriers and other public utilities latitude with respect to their business practices and decisions, particularly in those situations where a public utility directly competes with unregulated alternative service providers that are at liberty to charge a fee for the issuance of paper bills.

<sup>1</sup> The PTA is the state’s oldest trade organization for the local exchange carrier industry. The PTA represents more than 30 telecommunications companies that provide a full array of services over wireline networks.

<sup>2</sup> The comments presented herein are for discussion purposes only and without prejudice to any position the PTA might take in any subsequent proceeding or proceedings involving these or any other matters.

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The PTA thanks the Commission for the opportunity to comment on the proposed paper billing fee rulemaking.

Respectfully submitted,

THOMAS, NIESEN & THOMAS, LLC

By 

Charles E. Thomas, III

*Counsel for  
Pennsylvania Telephone Association*

cc: Bureau of Investigation and Enforcement  
Office of Consumer Advocate  
Office of Small Business Advocate  
Steve Samara