



State of Utah  
Department of Commerce  
Division of Public Utilities

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**MEMORANDUM**

**To:** Public Service Commission

**From:** Division of Public Utilities  
Chris Parker, Director  
Bill Duncan, Telecommunications / Water Manager  
Casey J. Coleman, Utility Technical Consultant

**Date:** July 11, 2012

**Re:** In the matter of the Petition of CenturyLink to Permit Deviation from Rule R746-240-4 to Allow Changes to Certain Large Business Customers for Receipt of a Paper Bill, if Requested Docket No. 12-049-08.

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**RECOMMENDATION:**

Grant Qwest Corporation d/b/a CenturyLink (“CenturyLink”) an exemption from the requirement of Utah Admin. Code R746-240-4, continuing to allow CenturyLink to use electronic billing, and permitting CenturyLink to charge business customers for paper bills, if requested.

**ISSUES:**

On June 4, 2012 CenturyLink filed a petition with the Public Service Commission (“Commission”) asking for the ability to deviate from Utah Admin. Code R746-240-4, continuing to allow CenturyLink to use electronic billing, and permitting CenturyLink to charge business customers for paper bills, if requested, and the customer has monthly invoices greater than \$1,500, and the customer consents to the charge in its agreement with CenturyLink.

Since July 5, 2000 in Docket No. 99-049-32, the Commission has allowed deviation from Utah Admin. Code R746-240-4 allowing the Regional Bell Operating Company to submit electronic bills to its customer. At this time CenturyLink is seeking an additional deviation that would allow CenturyLink the ability to charge customers who request a paper bill, instead of an electronic bill. In their petition CenturyLink describes the customers who would be impacted by this deviation as follows:

- 1) The customer must request a paper bill in lieu of, or in addition to, an electronic bill;
- 2) The customer must have monthly bills greater than \$1,500; and
- 3) The charge would only apply after the customer consents to the charge through an agreement with CenturyLink.

CenturyLink further indicated that the charges would be agreed upon by the customer in its agreement with CenturyLink. Further, CenturyLink anticipates that there will be a different charge if the large business customer requests a full itemized bill versus a request to simply receive a “remittance page.”

In a similar petition by Verizon in Docket No. 09-2430-01 the Division recommended the Commission also grant a similar request by the Company. Again the Division believes the Commission should grant the deviation as requested by CenturyLink. In the competitive telecommunications marketplace it is unreasonable to place additional regulatory burdens on a company that would be harming competition. Additionally, any customer of CenturyLink who would be impacted by these potential charges would be aware of the charges in the contracts negotiated by each party. Finally, the charges do not seem unreasonable because companies can avoid any charges by accepting an electronic bill. Because of all these reasons, the Division recommends the Commission grant the petition of CenturyLink.

cc: Justin Jetter, Assistant Attorney General  
Torry R. Somers, Attorney for CenturyLink  
Paul Proctor, Attorney for Office of Consumer Services  
James Farr, CenturyLink