

# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** October 30, 2012

**AT (OFFICE):** NHPUC

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**FROM:** Michael Ladam, Assistant Director of Telecommunications

**SUBJECT:** DT 12-317, Union Telephone Company Intrastate Access Service  
Tariff: Add Language to Allow Alternate Billing Schedules

**TO:** Commissioners  
Debra Howland, Executive Director  
Kate Bailey, Director, Telecommunications

On Sept. 14, 2012, Union Telephone Company (Union) submitted a tariff filing to establish a process under which Union can modify the service bill date for its wholesale access service customers.

This change allows the Company to alter its billing date for one or more customers. In correspondence with Staff, Union indicated that this will allow the company to develop billing processes that are more cost-effective for low-volume wholesale usage: for example, a company that incurred a dollar or two in charges per month might be billed only when the balance exceeded five dollars.

Staff had two potential concerns with such billing schedule alterations: first, that excessively frequent changes to the billing date could be a burden to the wholesale customer; and second, that any change in billing date should not reduce the customer's window for payment unreasonably.

On reviewing the payments section of the tariff, both of these concerns are addressed. The Company's tariff language limits the frequency of bill date revisions per customer to a maximum of two per year, and requires that the Company provide 60 days' advance notice of such a change. Further, the tariff explicitly states that bills are due one month or 31 days after the bill date (i.e., a bill dated February 15th is due 28 days later, on March 15th). This interval will not be reduced if the bill date is changed.

In Staff's assessment, this tariff revision reasonably balances the operational concerns of Union and the interests of its wholesale customers. This tariff revision took effect on October 15, 2012 pursuant to RSA 378:3 and RSA 378:6, IV, and no further review or approval is required.