

## Alaska Telecom Association

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The Honorable Matt Claman  
Alaska State Legislature  
State Capitol  
Juneau, Alaska 99801

### **Re: Concerns Regarding House Bill 20 – Paper Document Fees**

Dear Senator Claman,

On behalf of the Alaska Telecom Association (ATA), I am writing to express concerns regarding House Bill 20, which would prohibit businesses from charging a fee for providing paper statements, invoices, notices, or other documents.

ATA represents the telecommunications providers that build and operate the networks connecting Alaska's communities. Our members serve customers across the state, including in some of the most remote and high-cost service areas in the country. These providers already face uniquely high operating expenses associated with transportation, logistics, power, and infrastructure maintenance in Alaska's challenging geography.

While we understand the intent behind HB 20, we are concerned that the bill could create unintended consequences for telecommunications providers and their customers.

### **Cost Recovery and Operational Impacts**

Telecommunications providers serve large customer bases and distribute monthly billing statements and other customer notices on a routine basis. Printing and mailing paper statements carries real and growing costs, particularly in Alaska where postage and logistical expenses are significantly higher than in many parts of the country.

Allowing companies to charge a modest fee for paper billing enables businesses to recover the direct cost of providing that optional service. If HB 20 eliminates this ability, those costs will not disappear, they will instead be shifted to all customers through higher rates or other charges.

In effect, customers who prefer electronic billing would be required to subsidize the additional costs associated with paper delivery.

### **Disproportionate Impact on Small and Rural Providers**

Many ATA members are small providers serving rural communities with limited economies of scale. For these companies, administrative cost recovery mechanisms, such as modest fees associated with optional services, help manage operating expenses and maintain affordable rates.

Policies that restrict these tools may have a disproportionate impact on smaller providers that already operate in extremely high-cost environments.

## **Regulatory and Legal Implications**

HB 20 would classify violations of the paper document fee prohibition as an unfair trade practice. This creates additional legal and compliance risk for companies attempting to navigate complex billing, notification, and regulatory requirements.

Telecommunications providers are already subject to extensive government oversight. Adding additional liability associated with routine billing practices would introduce unnecessary regulatory complexity.

## **Conclusion**

ATA supports policies that protect consumers and promote transparency. However, HB 20's broad prohibition on paper document fees may create unintended economic and operational consequences for telecommunications providers and their customers.

We respectfully encourage the Legislature to consider the impacts this proposal may have on Alaska's telecommunications providers, particularly those serving rural communities, and to work with affected industries to identify solutions that preserve both consumer protections and operational flexibility.

Thank you for your consideration of these comments.

Sincerely,



Christine O'Connor  
Executive Director  
Alaska Telecom Association