



May 4, 2026

Arkansas Legislative Council State Capitol Building  
500 Woodlane Street, Suite 315  
Little Rock, AR 72201

**RE: Request for Waiver Under Arkansas Act 929, Section 14-1-112(c) – City Water and Light of Jonesboro**

Dear Members of the Legislative Council:

City Water and Light Plant of the City of Jonesboro ("CWL"), an Arkansas consolidated utility district, respectfully requests a waiver from the requirements of Arkansas Act 929, Section 14-1-112(a)(2) as it pertains to email addresses used by CWL exclusively for automated billing communications sent from CWL to third-party vendors which are subsequently delivered to customers on CWL's behalf.

**Proposed Compliance Approach**

CWL is committed to full compliance with Act 929 and will transition to a .gov domain for:

- Our primary organizational website;
- All employee email addresses;
- All departmental email addresses; and
- General customer communications.

However, CWL requests a limited waiver to maintain a separate non-.gov domain email address utilizing a .org domain exclusively for automated billing, notifications, and payment processing communications sent by CWL to third-party vendor(s) which are subsequently delivered by such third-party vendor(s) to CWL's customers on CWL's behalf. An example of an email currently delivered under this .org domain is included as **Attachment 1**.

**Note:** CWL began evaluating the separation of billing services onto a dedicated domain in 2025 to address the technical infrastructure challenges described below.

Jake Rice III, MANAGER

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Upon the passage of Act 929, we postponed implementation to ensure our approach would be compliant with the new statutory requirements and to seek appropriate authorization through this waiver process.

### **Extraordinary Circumstances and Demonstrable Harm**

#### **1. Technical Infrastructure Limitations – SPF Record Lookup Limits**

CWL currently faces a critical technical constraint with our email authentication infrastructure. Our Sender Policy Framework (SPF) records already exceed the industry-standard lookup limit of 10, primarily due to our third-party billing vendor's email sending requirements and configuration changes over time.

#### **Why this matters:**

- SPF records are essential security mechanisms that prevent email spoofing and protect our customers from phishing attacks.
- Exceeding the 10-lookup limit causes SPF validation failures, resulting in legitimate emails being marked as spam or rejected entirely.
- This affects both our business operations and customer communications.

#### **Demonstrable harm from consolidation:**

- Combining billing emails with employee/departmental emails under a single .gov domain would further strain CWL's SPF record capacity.
- This would increase the likelihood of critical billing notifications and payment reminders failing to reach customers.
- Failed delivery of billing communications could result in:
  - Customers missing payment deadlines and incurring late fees;
  - Increased delinquency rates affecting utility revenue;
  - Higher operational costs for paper billing and collection efforts; and
  - Customer confusion and complaints regarding non-receipt of bills.

#### **2. Service Reliability and Business Continuity**

Maintaining billing communications on a separate domain provides critical operational benefits:

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- **Email deliverability isolation:** Issues with the .gov domain (configuration changes, DNS problems, security incidents) would not impact time-sensitive billing communications.
- **Vendor flexibility:** Our third-party billing provider can optimize email authentication and delivery without being constrained by our organizational email infrastructure.
- **Reduced service disruption:** Separating billing from general operations protects revenue-critical communications from unintended impacts of IT changes.

**Harm to citizens and businesses:**

- Utility customers depend on reliable billing notifications to manage household and business budgets.
- Small businesses operating on tight cash flow need predictable utility billing.
- Service interruptions or delivery failures could cause financial hardship for citizens through late fees or service disconnections.

**3. Established Practice – Precedent Within Arkansas Government**

CWL's proposed approach follows an established model already in use by Arkansas governmental entities at both the State and county levels:

**State-Level Precedent:** The Arkansas Office of Child Support Enforcement (OCSE), a division of the Department of Finance and Administration and a State agency governed by Arkansas Code Title 25, Chapter 1, currently uses [ark.org/mycase](http://ark.org/mycase) (a non-.gov domain) for child support payment processing, case management, and payment notifications. OCSE MyCase handles recurring payment scheduling, payment history, and automated payment reminders—functions directly analogous to utility billing services. The State explicitly directs child support obligors and recipients to use this non-.gov platform for all payment-related activities, demonstrating that Arkansas State agencies recognize the operational necessity of separate domains for specialized billing and payment functions beyond tax collection.

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**County-Level Precedent:** Craighead County utilizes countyservice.net for processing tax payments and sending tax-related notifications, while maintaining its primary government operations on a .gov domain.

These precedents demonstrate:

- CWL's proposed approach is technically sound and already implemented by Arkansas state agencies.
- CWL's proposed approach effectively balances security, functionality, and compliance with payment processing needs.
- Arkansas governmental entities at multiple levels have recognized circumstances warranting domain separation for financial transactions.
- Citizens are already familiar with this model for making payments to government entities.
- The practice is accepted by State agencies that are subject to Act 929's requirements.

#### **4. Customer Protection and Security**

Maintaining a consistent, established domain for billing communications enhances security:

- **Reduced phishing vulnerability:** Changing billing email domains creates an opportunity for scammers to exploit customer confusion during the transition period.
- **Customer education burden:** Citizens have learned to recognize legitimate billing emails from CWL's current domain; changing this creates risk.
- **Authentication consistency:** CWL's third-party vendor has established authentication and security protocols optimized for our current billing domain.

#### **Scope of Requested Waiver**

This waiver request is narrowly tailored and limited to:



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**Emails covered by waiver:**

- Automated billing statements and invoices;
- Payment reminders and due date notifications;
- Payment confirmation receipts;
- Past-due notices;
- Payment arrangement communications; and
- Service outage notifications.

**Emails NOT covered (will use .gov domain):**

- General customer service correspondence;
- Employee communications;
- Departmental operations; and
- All other organizational communications.

**Public Trust and Transparency**

CWL recognizes the intent of Act 929 to establish public trust through recognizable government domains. Our proposal supports this goal:

- Our primary public-facing website will use a .gov domain, clearly identifying us as a governmental entity.
- All employees and departmental email addresses will use .gov, ensuring official communications are easily identifiable.
- Billing emails will include clear identification that they are sent on behalf of CWL.
- The separate billing domain serves a specific, limited technical purpose and does not diminish public trust.

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### **Conclusion**

CWL respectfully requests a limited waiver of the requirements of Arkansas Act 929, Section 14-1-112(a)(2). As set forth above, the extraordinary technical circumstances detailed herein—specifically the SPF lookup limitations and the demonstrated harm to citizens through potential billing communication failures—justify a limited waiver for third-party billing email communications. This approach:

- Maintains the spirit and intent of Act 929 for all primary organizational functions;
- Follows a precedent established by other Arkansas governmental entities;
- Protects citizens and businesses from service disruptions and financial harm;
- Ensures reliable delivery of time-sensitive financial communications; and
- Preserves critical email security infrastructure.

We are prepared to provide additional technical documentation or answer any questions the Legislative Council may have regarding this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Nate Schimmel', is written over a horizontal line.

Nate Schimmel  
Administrative Services Director  
870-930-3315

[nschimmel@jonesborocwl.org](mailto:nschimmel@jonesborocwl.org)

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### **Attachments:**

1. Viewing email as a CWL customer

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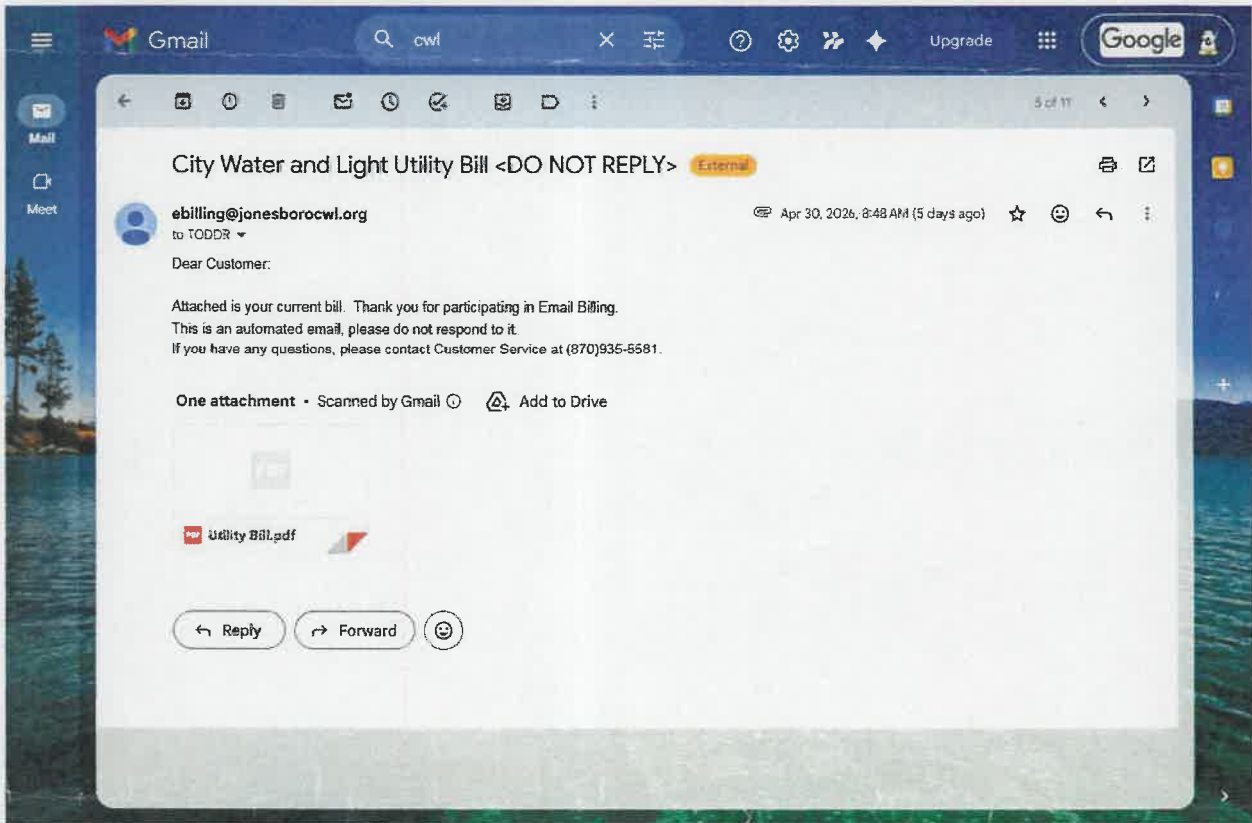


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## Attachment 1

Viewing email as a CWL Customer.

Email from [ebilling@jonesborocwl.org](mailto:ebilling@jonesborocwl.org) (via third-party application/provider)



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