Division of Legislative Services
ISSUE BRIEF

Fees for Paper Billing Statements

By: Emily Simon, Legislative Fellow
June 25, 2026

Overview

As online billing has become increasingly prevalent, some companies, including banks, credit card issuers, utility companies, and insurers, have begun charging fees to customers who use paper billing. The alternative is for customers to receive statements via email for free. Online payments can typically be made on laptops or on phones, with varying degrees of user-friendly interfaces.

Proponents of free paper billing argue that electronic statements are less likely to be noticed by customers and that electronic bills are difficult to pay for those with limited internet access, those who do not own computers at home, and the less technologically savvy. They argue that these difficulties can result in late- or missed- payment fees that can pile up quickly and that disproportionately impact low-income consumers. As of 2025, 46% of households making under $30,000 a year and 25% of households making between $30K-$69,999 do not have home broadband, whereas only 6% of households making $100,000 or more do not have home broadband. One proponent of free paper billing is Two Sides North America, which is a non-profit member organization that consists of companies in the paper, print, graphic communications, and paper-based packaging industries. In 2023, Two Sides North America conducted a survey that found "81% of U.S. consumers believe they should have the right to choose how they receive important communications from their service providers," and "46% of consumers said they would consider switching to an alternate provider if their current one forced them to go paperless." In light of these results, Two Sides North America takes the stance that consumers should have a right to choose whether to receive paper or electronic statements.

Synchrony Bank operates credit cards for many large retailers. In a Yahoo! Finance news segment about paper billing fees, Synchrony Bank, which charges fees for paper statements, said, "Due to changes in regulatory conditions, and to ensure...a full range of benefits, tools and rewards...we are making updates to some of our account terms across select credit card programs." The biggest proponents of digital bill payment over paperless billing are utility contractors such as Questline Digital, Kubra, and Mower, which tout the effectiveness of their digital payment and customer communications technologies and strategies. According to Questline Digital, the benefits of "promoting paperless billing" include "consistent digital relationships between your utility and its customers," in addition to the fact that "those who convert [to digital payment] are **31% more likely to open** and **25% more likely to click** on subsequent emails from their energy provider."

Advantages of Paper Billing

- **Reduces Late Payments**
  A 2015 study by the Consumer Financial Protection Bureau found that over half of customers do not check electronic statements at all, resulting in late payment fees.
- **Reduces cost burden on low-income households and those with limited Internet access.**
  Paper billing fees present a higher cost burden to low-income households than to higher-income households.

Challenges of Policy/Program

- **Industry Backlash**
  The companies Paylode and Curogram claim that electronic bills are less expensive than paper bills. While this claim is debated by Australian consumer advocacy group Keep Me Posted, industries that send bills to consumers will likely argue that fees are necessary to cover the costs of paper bills.

Compare State's Activity

- **Regulations**
  Pennsylvania and West Virginia regulations ban public utilities from charging paper billing fees or offering incentives for a preferred billing method.
- **Maine**
  Maine law bans financial institutions, credit card issuers, and credit unions from charging paper billing fees, but allows them to offer incentives for a preferred billing method.
- **West Virginia**
  West Virginia law bans cable operators from charging paper billing fees, and the industry cannot offer incentives for a preferred billing method.

Considerations for Delaware Legislators

- ***Manship v. TD Bank***
  This case struck down New York's General Business Chapter 20, Article 26, section 399-zzz. The law prohibited companies from charging consumers a fee for receiving paper billing statements while still allowing companies to "[offer] consumers a credit or other incentive" to select "a specific payment or billing option." The court ruled that because of this provision, the law functionally allowed TD Bank to charge a fee to its customers who use paper billing. The only thing the law changed was that TD Bank now had to say they were offering a "credit" or "incentive" to customers who use paper billing, rather than saying they were charging a "fee." The court ruled that this was a violation of TD Bank's first amendment rights, since it restricted the way TD Bank could talk to its customers without changing the actions the bank was allowed to take. Delaware legislators should consider this case when legislating on this topic.

Additional Resources

- This segment from NBC4 Los Angeles details the impact paper billing fees have on consumers.
- This summary of a report from Javelin Strategy & Research details how financial institutions can persuade consumers to switch to paperless billing.
- Summary of *Manship v. TD Bank.*