



1598 Bald Mountain Road
Bear Creek Township, PA 18702

June 15, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: COVID-19 Customer Service, Billing, and Public Outreach Provisions Request for Utility Information, Docket No. M-2020-3020055
Via: PUC E-File

Dear Secretary Chiavetta:

We are consultants to Ironton Telephone Company ("Company") and have been retained to prepare the responses to the Commission's request for information in the above captioned docket.

These responses were prepared following multiple discussions with the Company about their current and proposed customer service plans relative to the COVID-19 pandemic. This filing is hereby submitted through the PUC's E-File system in the above captioned Docket.

Should you have any questions or require any additional information, please contact me.

Very truly yours,

Zingaretti Enterprises, LLC

A handwritten signature in black ink that reads "Gary M. Zingaretti". The signature is written in a cursive, flowing style.

Gary M. Zingaretti, President

cc: Ironton Telephone Company (via email)
Sarah Dewey, PA PUC Bureau of Consumer Services (via email)
Tom Charles, PA PUC Office of Communications (via email)

Information requested: Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations.

Company response: The Company has historically maintained compliance with all PUC regulations. During the COVID-19 pandemic, this changed to ensure there were no interruptions in service due to non-payment or delinquent payments. See also response to follow in the Consumer Outreach section.

Information requested: After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

Company response: Beginning July 1, 2020, the Company intends to commence the termination of services for non-payment, in accordance with 52 PA Code § 64.

Information requested: How does the utility plan to implement terminations and will it start the process with new termination notices?

Company response: The Company will attempt to call customers to determine whether a payment plan could be established. Any terminations of service will begin by restarting the process and issuing new termination notices to its customers with delinquent payments.

Information requested: Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
- Provide future projections if available.

Company response:

Customer Class	Current	2019	Projected
Residential	40	27	Not Available
Business	7	0	Not Available
Lifeline	0	0	Not Available

Information requested: Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

Company response: In normal circumstances, the Company does charge a reconnection fee if a customer had their service terminated and subsequently arranged to return to service. To the extent that customers reconnected under the Commission’s Emergency Order wish to pay any arrearage and stay connected, the Company will waive its reconnection fee during July 2020.

Universal Service Programs:

Information requested: Is the utility currently removing customers from CAP for non-payment or failure to recertify?

Company response: To the extent this question is limited to only the Customer Assistance Program (CAP), it is the Company’s understanding that this is a plan for electric and gas utilities. For telephone Lifeline service, the Company has no Lifeline customers in non-payment status.

Information requested: What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

Company response: This is not applicable to telephone utilities.

Other Assistance Initiatives:

Information requested: Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

Company response: Verbiage used on courtesy calls to customers with past due balances was altered to indicate non-suspension of overdue accounts, suggesting customers call to establish payment plans for such accounts.

Information requested: Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor’s Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

Company response: For the month of July 2020, the Company will waive any reconnection fees for customers that would otherwise have these charges. Other than this one-time fee waiver, the Company intends to return to its standard operating practices following the expiration of the Commission’s Emergency Proclamation.

Consumer Education and Outreach

Information requested: Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

Company response: The Company educated their customers through annual Lifeline notices (see response to next question) and in telephone calls between the Company and its customers.

Information requested: Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

Company response: The Company offers Lifeline service for both phone and broadband. Information about this offering is made available to the customers on the Company's website, in the business office, and via an annual Lifeline notice sent to all customers.

Information requested: Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

Company response: The Company did not participate in any hearings or other important proceedings where public input may have been required. With respect to the availability of telephonic participation in meetings or hearings of political subdivisions, notice of such meetings is the responsibility of the political subdivision (per Senate Bill 841).

Information requested: Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

Company response: As part of the annual Lifeline notice, customers are made aware of their option to use their Lifeline benefit for their Broadband Internet Service. Customers experiencing difficulty paying their bills were encouraged to contact the Company to review their options, including Lifeline. The Company also uses social media to communicate with its customers.

Information requested: If programs have been modified due to the pandemic, please provide current customer education tools and advertising so that the Commission's own customer education efforts are based on current utility programs and practices.

Company response: No modifications have been made to the programs other than those necessary to ensure the Company's compliance with the federal waivers. These include broadening the way a consumer can demonstrate income eligibility and ceasing involuntary de-enrollments of existing Lifeline subscribers.