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June 15, 2020

VIA ELECTRONIC FILING

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

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

Dear Secretary Chiavetta:

By Secretarial Letter dated May 29, 2020, the Pennsylvania Public Utility Commission ("Commission") directed utilities to provide certain information regarding COVID-19 Customer Service, Billing and Public Outreach within 10 calendar days of the issuance of the Secretarial Letter. This letter response to the Commission's May 29, 2020 Secretarial Letter inquiry is submitted by The United Telephone Company of Pennsylvania, LLC d/b/a CenturyLink and the other Pennsylvania certificated affiliates of CenturyLink.¹

This response does not contain confidential information. The responses follow the format set forth in the Secretarial Letter, albeit the questions have been sequentially numbered. Finally, all persons identified in the Secretarial Letter are provided an electronic copy of this letter response. The public advocates also have been electronically copied on these responses.

¹ As a result of various transactions, CenturyLink currently has a total of ten (10) certificated entities in Pennsylvania. The certificated entities are: Broadwing Communications, LLC; CenturyLink Communications, LLC; Global Crossing Local Services, Inc.; Global Crossing Telecommunications, Inc.; Level 3 Communications, LLC; Level 3 Telecom Data Services, LLC; The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink; TelCove of Pennsylvania, LLC; TelCove Operations, LLC and WilTel Communications, LLC (collectively, "CenturyLink").

I. COVID-19 Utility Consumer Service and Billing Policies and Procedures

Response: As an initial matter and before responding to the specific questions, in response to the COVID-19 pandemic, CenturyLink was one of the initial signatories to entities complying with the Federal Communication Commission's ("FCC") Keep Americans Connected Pledge. As a result, CenturyLink is not suspending or disconnecting consumer or small business services due to financial circumstance related to COVID-19. CenturyLink voluntarily extended its commitment to the pledge through June 30, 2020.

Termination of Utility Service:

1. 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?

Response: The Commission's Emergency Order prohibited utilities subject to the Commission's jurisdiction from terminating service "during the pendency of the Proclamation of the Disaster Emergency . . . unless otherwise determined by the Commission." On June 3, 2020, Governor Wolf renewed for an additional ninety-day period, or until approximately September 4, 2020, the Proclamation of Disaster Emergency.

In anticipation of the June 30, 2020 expiration of the FCC Keep Americans Connected Pledge, CenturyLink has been evaluating how to best support its customers that may have unpaid balances starting July 1, 2020. The company has been seeking input from its various internal departments to create a program that acknowledges the hardships faced by its consumer and small business customers by providing them with reasonable and flexible repayment terms. At this time, CenturyLink is in the process of finalizing those plans and will provide it to the Commission upon completion.

2. How does the utility plan to implement terminations and will it start the process with new termination notices?

Response: Regardless of customer or service type, CenturyLink endeavors to retain customers and will work with customers to retain that relationship where possible. As outlined in Question 1 above, CenturyLink is in the process of finalizing those plans and will provide it to the Commission upon completion.

To the extent a consumer or small business customer seeks a payment plan, they should contact CenturyLink via phone, email or web chat and a payment plan will be mutually agreed upon which will halt the disconnection process. If the customer does not contact CenturyLink, the standard process flow will may include service disconnection and collection efforts, as allowed under any applicable rules and regulations

Relative to residential retail customers, CenturyLink will include in its plan customer notice and disconnection processes as referenced in its Commission approved Tariff No. 26 (https://www.centurylink.com/tariffs/pa_ut-pa_gen_t_no_26.pdf) and in connection with **52 Pa. Code § 64.181 Restoration of service after suspension.**

Relative to retail business customers or wholesale customers, CenturyLink will follow any applicable contractual or tariff requirements concerning billing, payment and terminations.

3. 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?

Response: To the best of its ability, CenturyLink attempted to identify, in Chart 1 below, the business and residential accounts with a past due balance. The intent was to represent the population of accounts that have at least some payment reconciliation needed. Not all these accounts will result in a suspension or termination of services and the number of accounts is fluid as customers make payments.

Many of these accounts are the same month-over-month. The number listed for each month includes accounts that may have already been identified as having a past due balance in the previous month.

In lieu of 2019 comparative data, CenturyLink included a run-rate of past due accounts from the start of 2020. The data reveals an increase in business-related past due amounts and a decrease in residential past due amounts.

Chart 1: Number of accounts with any past due balance amount

	Residential: Regulated Voice	Business: Regulated Voice
Jan-20	16,219	2,012
Feb-20	15,385	1,788
Mar-20	15,113	1,910
Apr-20	14,815	2,127
May-20	14,062	2,149

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

Response: Chart 2 below provides the number of accounts with any past due balance that are actively receiving a federal Lifeline discount for either voice or broadband services. A

low-income customer who qualifies under the FCC's Lifeline program must select only one service (voice or broadband) upon which to apply the discount.

Chart 2: Number of Lifeline accounts with any past due balance amount

	Number of Lifeline accounts
Jan-20	91
Feb-20	86
Mar-20	86
Apr-20	109
May-20	80

b. Provide future projections if available.

Response: Not available

4. 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?

Response: Under the FCC Keep Americans Connected Pledge, CenturyLink at present is not proactively suspending or disconnecting consumer or small business services due to financial circumstance related to COVID-19. Customers at present do not need to do anything to ensure their account remains active.

Universal Service Programs:

5. Is the utility currently removing customers from CAP for non-payment or failure to recertify?

Response: The CAP program is not applicable to CenturyLink.

6. 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?

Response: The CAP program is not applicable to CenturyLink.

Other Assistance Initiatives:

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

Response: Under the FCC Keep Americans Connected Pledge, CenturyLink has been including a bill insert message for customers who were receiving normal collections notices to assure them that they would not be disconnected at this time.

Furthermore, CenturyLink utilized its COVID-19 website to communicate real-time modifications on how it was assisting customers impacted by the pandemic. A few examples include how CenturyLink was keeping customers safe when interacting with technicians in their homes and businesses as well as the remote options to manage their account online and through various toll-free options.

<https://news.centurylink.com/covid-19>

8. 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.

Response: CenturyLink is a global provider of technology services. Given the breadth and scope of its products and services offerings, CenturyLink will continually evaluate the needs of its customers and employees in response to the COVID-19 pandemic. Consideration will be given to the impact of the expiration of the Pennsylvania Governor's Emergency Proclamation as well as myriad state, national, and international government actions being taken in response to COVID-19.

II. Consumer Education and Outreach

9. 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.

Response: CenturyLink has been actively communicating with its customers regarding COVID-19 related information through a dedicated webpage, numerous blog posts, and press releases. <https://news.centurylink.com/covid-19>

In addition, CenturyLink already outlined in Question 7 above its bill insert outreach to those customers experiencing a financial hardship.

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

Response: CenturyLink has provided its customers with COVID-19 related information through its webpage dedicated to the company's participation in the FCC Lifeline program. <http://www.centurylink.com/lifeline>

11. 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.

Response: This question is not applicable to CenturyLink at this time.

12. 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.

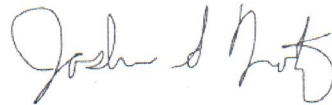
Response: See response to question 10 above.

13. 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.

Response: See responses to questions 9 and 10 above.

If you have any questions, please contact me at (614) 441-0393 or josh.motzer@centurylink.com.

Sincerely,



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Director Government Affairs

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