

ARMSTRONG®

June 15, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

The following is a response of Armstrong Telephone Company – PA and Armstrong Telephone Company – North to a Secretarial Letter issued in the above Docket.

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

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:

RESPONSE: Armstrong has relaxed its non pay policies. Armstrong has signed on to the Federal Communications Commission's Keep Americans Connected Pledge. This means that Armstrong has waived terminations due to the inability of customers to pay due to COVID-19 issues. This Pledge runs through June 30, 2020.

Termination of Utility Service:

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

RESPONSE: Armstrong will wait for 30 days before enforcing terminations.

- 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many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?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.

RESPONSE: Armstrong currently has 25 residential accounts with past due balances.

- 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: Armstrong has relaxed its non pay policies including assessment of reconnection fees. Armstrong will waive its reconnection fee during the 30 day period after the Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends.

Universal Service Programs:

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

RESPONSE: Armstrong has not removed any Lifeline customers.

- 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: Not applicable to Armstrong.

Other Assistance Initiatives:

- 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: Armstrong has made more information available to customers online and through other media to keep them informed. Armstrong has made it easier for customers to interact with the company without personal contact.

- 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.

Rosemary Chiavetta

June 15, 2020

Page 3

RESPONSE: Not applicable.

II. Consumer Education and Outreach

- 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: Armstrong has made additional information available online. Armstrong has also provided information to customers on bills.

- 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: Armstrong has made additional information available online. Armstrong has also provided information to customers on bills.

- 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: Not applicable.

- 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: Armstrong provides annual notices in bills to customers.

If there are any questions, I can be reached at 724-283-0925.

Sincerely,

/s/ Shawn Beqaj

Shawn Beqaj
Vice President – Regulatory Policy and Interconnection