

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:

Windstream has taken swift action to ensure that its customers are able to stay connected to vital telecommunications services in this time of uncertainty. Because many of our customers have simultaneously faced disruptions to their livelihoods and an increased need to stay connected to work, family, and school, while social distancing, we have taken measures to alleviate our customers' concerns and to minimize the financial burdens facing them throughout this crisis.

In addition to fully complying with relevant state orders (including the Commission's Emergency Order on Terminations) regarding service suspensions and late fees in response to COVID-19, on March 13, 2020, Windstream signed the FCC's Keep Americans Connected Pledge. Nationwide, through June 30, Windstream will not suspend telephone or broadband service for any residential and small business customer because of their inability to pay their bills specifically due to COVID-19-related disruptions. Additionally, through June 30, Windstream is waiving any late fees that any residential or small business customers incur because of their economic circumstances related to COVID-19.

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?

In accordance with the Pennsylvania Public Utility Commission ("PUC") Emergency Order issued March 13, 2020 at Docket No: M-2020-3019244, Windstream ceased terminating service, as directed, "during the pendency of the Proclamation of Disaster Emergency," which automatically expired on June 4, 2020, unless renewed by amendment. On June 3, 2020, Governor Wolf amended the Proclamation of Disaster Emergency extending the proclamation for another 90-day period.

During the PUC-directed moratorium of terminations, suspension notices have been suppressed for any residential and small business customer notifying Windstream of a hardship resulting from COVID-19. Windstream continues to send notices for delinquent accounts in accordance with Title 52, Chapter 64, Subchapter E, Suspension of Service. The decision to continue sending notices of non-payment to undisputed accounts was

made to ensure our customers are aware of the arrearages, and to eliminate any risk of “surprise” when terminations are ultimately reinstated. No service terminations have been implemented since the Proclamation of Disaster Emergency.

Windstream will begin to enforce the terms of its suspension notices when the suspension date falls after the expiration of the Emergency Order. Customers will have at least 11 days to contact Windstream to make payment arrangements. Where customers continue to face hardships, we will then work with them on a case-by-case basis to address their specific circumstances.

- 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.

Suppressed terminations (as of 6/11/20): 3,373

- Residential – 3,304, of which 38 are Lifeline accounts
- Business – 69

However, please note that some payments have already been received on past due accounts. As of 6/11/20, 1,604 accounts, which would have been subject to termination, have a zero balance or a current bill. Therefore, if the Commission rescinded its Emergency Order on 6/11/20, the number of accounts subject to termination would have been 1,769.

In 2019, during approximately the same time period, 2,533 accounts were terminated for non-payment. Windstream is not currently able to provide a breakdown by customer class of historic account terminations for this same period.

- Provide future projections if available.

Windstream is unable to accurately project the amount of customer accounts that will be subject to termination for non-payment.

- 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?

Windstream’s reconnection fee is added to a customer’s account balance on the date that service to the customer is restored. No customers were terminated in accordance with the Commission’s Emergency Order and therefore, no account facing a suppressed

termination is currently subject to Windstream's reconnection fee. If a customer is unable to pay arrearages upon the expiration of the Emergency Order and enters into a payment arrangement plan before the account is suspended for nonpayment, a reconnection fee is not applicable.

Universal Service Programs:

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

Not applicable.

- 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?

Not applicable.

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.

As a signatory to the FCC's Keep Americans Connected Pledge, through June 30, 2020, Windstream is waiving late fees and will not suspend telephone or broadband services to any of its residential and small business customers nationwide because of the inability to pay their bills specifically due to COVID-19-related disruptions.

Disaster assistance is being offered to both consumer and small business customers who are experiencing hardship or business interruption due to COVID-19 and request to have services suspended. Customers are offered the following solution:

For up to 90 days, Windstream will waive all fees for late payments including collection fees and the customer will not be charged for Windstream services. The customer will need to contact Windstream once he/she is able to remove the hold and restore service.

To support our existing and prospective customers with remote work enablement, Windstream is offering our OfficeSuite Standalone HD Meeting services for free for 90 days to new OfficeSuite customers and HD Meeting services through MyOfficeSuite portal for existing customers. This offer will expire on 6/30/2020.

Windstream is also offering a Special Lifeline Promotion for our most vulnerable customers. For Lifeline-qualified new customers, we are offering service plans that provide two months of free service with no activation fees, contract term commitments, or data caps.

- 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. Utilities are directed to report this information to Sarah Dewey, sdewey@pa.gov in the Commission’s Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

As stated above, Windstream will begin to enforce the terms of its suspension notices when the suspension date falls after the expiration of the Emergency Order. Upon receipt of a suspension notice, customers will have at least 11 days to contact Windstream to make payment arrangements.

If customers continue to face hardships, Windstream will consider instituting payment plans on a case-by-case basis. If a customer is not able to make a partial payment and/or pay, an extended payment arrangement may be provided. Under such arrangement, the remaining past due balance may be paid in 3-6 monthly installments, along with the customer’s current bill, by each of the current bill’s due dates. If a customer still claims they are unable to pay monthly installments to bring current any arrearages, a settlement of up to 50 percent may then be offered to reduce the past due amount.

I. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, thcharles@pa.gov, in the Commission’s Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

- 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.

Detailed information is provided to our customer service and financial service representatives through an internal website. The website houses all relevant information

on COVID-19 policies and procedures. All customer care and financial service representatives received training on available assistance programs.

Windstream is working with customers on a case-by-case basis. We have information posted on our consumer and small/medium business websites to make customers aware of the actions we are taking. This information has also gone out in an email to our entire customer base. Information is available at:

- <https://news.windstream.com/Windstream-COVID-19-Response/>;
- <https://blog.windstream.com/keeping-customers-connected-even-during-social-distancing/>; and
- <https://businessblog.windstream.com/covid-19-relief-for-businesses>.

Additionally, a new banner has been added to the customer-facing MyWIN Desktop web portal with a link to Windstream's COVID-19 updates.

Further information on Windstream's efforts can also be found on the FCC's website at <https://www.fcc.gov/companies-pledging-keep-americans-connected-during-pandemic-go-above-and-beyond-call>.

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

Windstream proudly participates in the federal Lifeline program. Information can be found on our website about this important program at <https://www.windstream.com/about/windstream-information/lifeline-assistance-program>.

- 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.

We are unaware of any important proceedings that may include telephone public input hearings and allowing consumers to be able to make their voices heard.

- 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.

Pennsylvanians can visit the FCC or Windstream's Lifeline Program websites at <https://www.windstream.com/about/windstream-information/lifeline-assistance-program> or <https://www.fcc.gov/general/lifeline-program-low-income-consumers>.

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.

Please see above.