

August 18, 2020

VIA ELECTRONIC FILING

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

Re: Emergency Order at Docket Number M-2020-3019244

Dear Secretary Chiavetta:

Verizon Pennsylvania LLC and Verizon North LLC (“Verizon”) respond to Chairman Gladys Brown Dutrieuille’s August 10, 2020 letter seeking comments relating to the Commission’s COVID-19 utility terminations moratorium.¹

On March 13, 2020 (ratified March 26) the Commission entered an emergency order that “all electric, natural gas, water, wastewater, telecommunications, and steam utilities subject to the Commission's jurisdiction are prohibited from terminating service during the pendency of the Proclamation of Disaster Emergency, unless to ameliorate a safety emergency, or unless otherwise determined by the Commission.” The Governor’s Disaster Proclamation expires on or about September 2, 2020, unless renewed.

The Chairman’s letter requested comments on lifting the terminations moratorium and protections for “at-risk customers” after it ends.

The Commission should lift the terminations moratorium for regulated telecommunications services and no additional conditions are necessary for this utility segment. The communications industry – both regulated and unregulated – has proactively taken steps to assist customers whose ability to pay has been affected by the COVID-19 emergency and will continue to do so.

¹ Verizon comments for regulated telecommunications services only, and does not express an opinion on electric, natural gas, water, wastewater or steam services.

Speaking for Verizon,

- Verizon signed the FCC's Keep Americans Connected pledge, under which residential or small business customers of regulated and unregulated services who let us know that they are experiencing hardship due to COVID-19 could avoid disconnection and have late fees waived. Verizon implemented a simple process for customers to opt into treatment under the pledge, online or over the phone. Verizon extended its implementation of this program through June 30, 2020. After June 30, Verizon continued to protect these customers through the company's own "Stay Connected" program, where participating customers' past-due balances were deferred, so that their accounts would be considered current and they could pay the balances over time. Starting on their July bill, participating customers are being billed their current charges plus one-sixth of their past-due balance.
- Customers of regulated service subject to the Commission's Emergency Order who contacted Verizon before June 30 to self-identify that they have been impacted by COVID-19 were enrolled in the Stay Connected program to spread out their payments. When the Emergency Order ends, any customer who did not contact us before but who asks for assistance will be offered the opportunity to enter into payment arrangements lasting up to three months to address their unpaid balances. And Verizon will provide all required notices before suspending or disconnecting any regulated service, so customers will have the opportunity to contact Verizon and ask for a payment arrangement if needed.
- Verizon has taken additional steps for Lifeline customers to attempt to avoid payment issues in that customer segment. First, Verizon issued two months of billing credit to Lifeline customers in service as of March 22, 2020. These credits had the effect of zeroing out the customers' bills for two months, including not only voice services but also charges for High Speed Internet service, toll service, etc. Verizon is also complying with a series of orders issued in the FCC's *Lifeline and Link Up Reform and Modernization* docket (WC Docket No. 11-42) that directly impact customers receiving Lifeline service. These orders, extended by the FCC through August 31, 2020, waive the program's recertification, reverification, general de-enrollment, usage requirements, and income documentation requirements. And after the Emergency Order ends, any Lifeline customer with a past due balance that contacts Verizon will be offered a payment arrangement lasting up to three months.
- Verizon has kept its customers informed of their options under the FCC pledge and Verizon Stay Connected program. All customers received a direct written communication from Ronan Dunne, the Verizon Consumer Group CEO, in April informing them of Verizon's extension of account protections through June 30 and the commitment to waive late fees and not to terminate service for those consumers and small businesses who were unable to pay due to disruptions

caused by the pandemic, as well as the upcoming automatic enrollment in the Stay Connected program. Verizon also maintains extensive online resources for consumers informing them of our response to COVID-19 as well as Lifeline service, and this information is updated as necessary. See:

<https://www.verizon.com/about/news/our-response-coronavirus> as well as <https://www.verizon.com/support/consumer/account/manage-account/lifeline-discount>

- Additionally, Verizon and its affiliated companies have sought to mitigate the impacts of the pandemic on society at large by offering special assistance to teachers and first responders, supporting distance learning, and making substantial donations to key organizations involved in responding to the crisis.
- All of our efforts are just part of why we were particularly honored to be ranked #1 on the new [Forbes Corporate Responders ranking list](#), which assessed how well the 100 largest employers among U.S. public companies responded to the COVID-19 public health crisis.

In short, Verizon has responded to the needs of customers affected by the COVID-19 emergency, putting in place a robust series of measures that have appropriately addressed the financial difficulties faced by consumers and their ongoing need for communications services, both regulated and unregulated.

As the Chairman's letter recognizes, the Commission must balance its roles of protecting customers who rely on regulated services while maintaining the financial health and operational efficiency of utilities, with the goal of ensuring that they remain able to provide safe and adequate service at just and reasonable rates. At this point the terminations moratorium should end for regulated telecommunications services and it is not necessary for the Commission to impose any rules or restrictions on the payment and collections process for those services beyond what applicable regulations already require. Verizon and the other providers of regulated telecommunications services operate in a highly competitive market where customers have a choice of providers and different technologies to meet their communications needs, most of which are not regulated by the Commission. This industry has demonstrated that it will care for the needs of customers during this difficult time without regulatory intervention.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Suzan D. Paiva