



Oregon Citizens' Utility Board

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October 31, 2023

via electronic filing

Public Utility Commission
Attn: Filing Center
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RE: UM 1908 – Hearing on Orders - CUB's Comments on Response to Commission-Directed Inquiries and Post-Incident Report of Lumen Technologies d/b/a CenturyLink

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to provide comments on the Lumen Technologies d/b/a CenturyLink (CenturyLink or the Company) *Response to Commission-Directed Inquiries and Post-Incident Report of Lumen Technologies d/b/a CenturyLink*. CUB appreciates that the Oregon Public Utility (PUC or Commission) Staff (Staff) worked closely with the Company to understand its response to the Labor Day outages, and for expeditiously bringing the matter before the Commission for review. We also appreciate the Commissioners' adopting CUB's recommendations directing CenturyLink to explain whether it was in compliance with Order No. 22-340, as modified by Order No. 22-422, and as affirmed by Order No. 23-109 (the "Jacksonville Orders").

CenturyLink customers in Jacksonville and surrounding areas experienced a telephone service outage on September 2, 2023, connected to issues with T1 spans serving those customers, and another on September 3, 2023, due to damage to a telephone cabinet serving those T1 spans.¹ On September 20, 2023, Staff presented its analysis of the outages and recommendations on whether or not the Company was following the Commission's Jacksonville Orders.²

In Order No. 23-356, the Commission agreed with Staff's recommendations in part, and directed CenturyLink to, by October 23, 2023, follow up with a filing that:

1. Describes how it is complying with each requirement of Order Nos. 22-340 and 22-422 related to the September 2 and September 3 outages, and to provide supporting documentation;
2. Responds to Intervenor Priscilla Weaver's proposal for a Jacksonville-area outage triage process;
3. Provides updated call logs that include information for September 7, 2023; and
4. Includes a post-incident assessment.³

¹ UM 1908 – [Order No. 23-356](#), Appx. A 3-4 at(Sept. 28, 2023).

² *Id.* at 1.

³ *Id.*

The Commission provided the opportunity for public comment on CenturyLink’s response. CUB provides our thoughts below.

Compliance with the Jacksonville Orders

CenturyLink states that it first became aware of the September 2, 2023, outage (“first outage”) when one of its technicians received a direct phone call from a customer. It was then discovered that T1 spans were “in an out-of-balance condition” and once they were manually reset, service was restored at or around 8 pm.⁴ The second outage on September 3, 2023, occurred at or around noon which CenturyLink concluded was caused by a vehicle accident or act of vandalism.⁵ Based upon CenturyLink’s statements and the images it provided, CUB concurs with Staff’s conclusion that the second outage was a force majeure event relieving the Company of some of its service quality objective service levels.⁶

However, it is not clear from CenturyLink’s filing that service was completely restored after the first outage. Several customers commented⁷ that their service was still out the night of the first outage⁸ and the morning of September 3, 2023, whereas CenturyLink reported that the telecom cabinet damage causing the second outage occurred midday.⁹ Given an exact time of the cabinet destruction is likely unknown, it could be that this damage occurred earlier in the day, or even the night before and the second outage actually started earlier. CUB brings this up not to diminish the events or to challenge the Company’s assessment, but to express our preference that the Company provide documentation that offers more transparency that a repair made is a permanent solution that adequately addresses the problem. Perhaps the manual reset was not enough to repair the issue that caused the first outage and some customers would have experienced intermittent service or ongoing outages from the initial T1 span issue if a second outage did not occur. CUB is not suggesting this is the case necessarily, but given the history of ongoing outages, intermittent service, and the fact that copper wires in the T1 spans provide service to Jacksonville-area customers, at least in the event CenturyLink must file a compliance filing or a response like in this case, CUB believes we are at a place where, moving forward, CenturyLink must provide documentation to the Commission with its compliance filing, i.e., a copy of whatever internal messaging/report it receives, when it learns service has been restored, when possible.

CUB continues to agree with Ms. Weaver that the Company’s dedicated support line has not been operating as the Commission intended in the Jacksonville Orders and it has not for quite some time. As customers have shared and CenturyLink has acknowledged, several customers affected by the Labor Day outages did not receive an expedited customer service response as

⁴ UM 1908 – [Response to Commission-Directed Inquiries and Post-Incident Report of Lumen Technologies d/b/a CenturyLink](#) at 2 (Oct. 23, 2023) (“Lumen’s Response to Commission”).

⁵ *Id.*

⁶ OAR 860-032-0012(2).

⁷ See [E.W. Comments](#) (9/5/2023); [B.D. Comments](#) (9/5/2023); [B.Y. & K.R. Comments](#) (9/5/2023).

⁸ See [J.K. Comments](#) (9/5/2023); [M.H. Comments](#) (9/5/2023).

⁹ *Lumen’s Response to Commission* at 2.

expected under the Jacksonville Orders.¹⁰ CUB is not prepared to make a recommendation as to whether the Commission should issue penalties for violation of the provisions of the Commission's Jacksonville Orders as they pertain to the requirements for the dedicated service line. However, CUB is as encouraged as Ms. Weaver by the changes the Company has already implemented to address shortcomings with the first iteration of the dedicated line. While it is uncertain why the reasons for why the original dedicated line and customer service response has been inadequate, these changes are not only immediate, but appear to be meaningful and responsive to Ms. Weaver's suggestions and customer frustrations. CUB applauds the Company's work to improve this process for customers and believe this new strategy should facilitate compliance with the Jacksonville Orders.

Post-Assessment Considerations

Finally, CUB supports Ms. Weaver's comments in response to CenturyLink's Response to the Commission, including her suggestion that the Company consider an automated telephone call to customers as a means of outage communication. We appreciate the Company's offer to consider alternatives for post-incident dissemination of information and/or proactive communication of service outage and repair status and hope CenturyLink takes her suggestion into consideration.¹¹ CUB also appreciates that CenturyLink reviewed its call logs and provided updated responses in its next bi-monthly filing.

CUB is satisfied that the Company prioritized repairs in the Jacksonville-area Labor Day outages. If another event occurs warranting the Company to demonstrate compliance with the Orders, CUB believes additional documentation to show what permanent repairs were made, or if temporary, will be made for assurance that a long-term solution has been identified, where appropriate and where possible. We are excited about CenturyLink's new dedicated service line process and are encouraged that it already seems to be working well, based upon Ms. Weaver's recent experience, and hope the Company will consider her suggestions for proactive and post-incident reporting and/or updates to customers. Finally, CUB firmly believes that it is the Jacksonville Orders that have motivated the Company to prioritize repair in these communities and are critical to ensuring better telephone service quality in these rural areas with limited reliable communication tools.

Thank you again for the opportunity to comment.

Sincerely,

Jennifer Hill-Hart
Policy Manager
Oregon Citizens' Utility Board

¹⁰ See UM 1908 - Order No. 22-340, Appx. A at 8 (Sept. 23, 2023).

¹¹ *Lumen's Response to Commission* at 13.