

October 7, 2022

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Nolan Moser  
Chief Administrative Law Judge  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

**Re: UM 1908 Issues List**

Dear Judge Moser:

As you requested during our October 6, 2022 pre-hearing conference, Lumen files this issues list. While we cannot represent this is agreed to by all parties, we circulated it to CUB and Staff during a call on Tuesday, October 4, asked for comments, and received no proposed revisions.

**Issues List:**

Did the Commission have legal authority to include the following terms in Order 22-340 and, if so, do these provisions in Order 22-340 comply with applicable procedural and substantive requirements?

1. Requiring Lumen to deploy a toll-free, 24/7 dedicated customer support line no later than Wednesday, September 28, 2022, to support customers in Jacksonville, Applegate, and surrounding areas in southern Oregon.
2. Allowing callers to that line to report service issues for multiple addresses other than their own.
3. Requiring Lumen to address all tickets and make repairs “to the satisfaction of customers” within 48 hours of creation of the ticket.
4. Announcing the intention to level penalties for violations of the Order for each instance in amounts not to exceed \$50,000 per day such that, for example, each day a ticket is not resolved in the 48-hour period will be a violation, for each customer and each day.

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Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Law Reichman". The signature is fluid and cursive, with the first name "Law" and last name "Reichman" clearly visible.

Lawrence H. Reichman