

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1908 / UM 2206**

4 In the Matter of

5 LUMEN TECHNOLOGIES,

6 Proposed Commission action Pursuant to  
7 ORS 756.515 to Suspend and Investigate  
8 Price Plan (UM 1908), and

9 QWEST CORPORATION,

10 Investigation Regarding the Provision of  
11 Service in Jacksonville, Oregon and  
12 Surrounding Areas (UM 2206)

**CENTURYLINK’S MOTION TO  
EXTEND 2018 PRICE PLAN**

**Expedited Consideration Requested**

13 CenturyLink respectfully moves the Commission for an order extending the effective  
14 date of its existing price plan, approved in Order No. 18-359 (the “2018 Price Plan”), through  
15 August 1, 2024, and providing that the price plan the Commission approved in Order No. 24-041  
16 (the “2024 Price Plan”) will be effective immediately upon expiration of the 2018 Price Plan.<sup>1</sup>  
17 CenturyLink requests expedited consideration of this motion because the 2018 Price Plan is  
18 effective only through May 15, 2024. CenturyLink is authorized to represent that this motion is  
19 supported by Commission Staff, Oregon Citizens’ Utility Board (“CUB”), and Intervenor  
20 Weaver.

21 On February 29, 2024, CenturyLink filed a motion for an order extending the effective  
22 date of the 2018 Price Plan through May 15, 2024, and providing that the 2024 Price Plan will be  
23 effective immediately upon expiration of the 2018 Price Plan. That initial motion seeking an  
24 extension was supported by Commission Staff, CUB, and Intervenor Weaver. In Order

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26 <sup>1</sup> On April 30, 2024, the Commission entered Order No. 24-113, adopting certain errata to the stipulation the  
Commission had approved in Order No. 24-041.

1 No. 24-059, issued February 29, 2024, the Commission granted CenturyLink’s motion and  
2 extended the term of Lumen’s 2018 Price Plan through May 15, 2024.

3 As set forth in CenturyLink’s February 29, 2024 motion, CenturyLink commenced  
4 efforts to implement changes to its IT systems to develop the functionality to route calls from  
5 Protected Customer phone numbers to a dedicated customer service line, rather than only calls  
6 from Jacksonville area customers screened by ZIP Code, immediately after issuance of Order  
7 No. 24-041. CenturyLink indicated that identifying calls from Protected Customers by phone  
8 number rather than a single ZIP Code requires creating a centralized database for the Protected  
9 Customers, as well as tools to add or remove Protected Customers from that database as  
10 necessary from time to time. The ability to keep the database current and launch data queries into  
11 that database from various systems used by customer care, dispatch centers, and field operations,  
12 requires substantial IT coordination and programming, with a sizeable cost. Not knowing  
13 whether the Commission would approve or amend the Stipulation and price plan, CenturyLink  
14 could not commence this development work earlier. In late February 2024, CenturyLink learned  
15 that the IT development work would require approximately 30 to 60 days to code and implement  
16 the database and these call-routing changes.

17 While IT development work is ongoing, that effort has proven to be more complex than  
18 initially believed. Specifically, there are intricacies among the numerous systems in the customer  
19 call handling and interactive voice response areas, as well as dispatch, field operations, and  
20 reporting and analysis, that must all have Application Programming Interface (API) capabilities  
21 for querying from and writing to the new Protected Customer database. The coding for all those  
22 systems, testing, revisions, and final entry into production is now firmly scheduled for a July 12,  
23 2024 implementation release.

24 As a further update on the status of implementing the 2024 Price Plan, CenturyLink has  
25 developed and shared with Staff and CUB its plans for notification of residential subscribers in  
26 Oregon of the availability of Protected Customer status and the means by which CenturyLink’s

1 residential local service customers in Oregon may contact the Company to inquire about  
2 enrollment as a Protected Customer.

3 CenturyLink confirms that the Jacksonville Orders (as defined in Order No. 24-041) will  
4 remain in effect and will not subject to suspension until the 2024 Price Plan takes effect.

5 For the reasons set out above, CenturyLink respectfully requests that the Commission  
6 extend the effective date of the 2018 Price Plan through August 1, 2024, and confirm that the  
7 2024 Price Plan will be effective immediately upon termination of the 2018 Price Plan. If  
8 CenturyLink is able to complete the IT coordination and programming work necessary to  
9 implement the dedicated customer service line for all Protected Customers before August 1,  
10 2024, it will inform the Commission and may request that the 2024 Price Plan become effective  
11 earlier than that date.

12  
13 DATED: May 10, 2024

**PERKINS COIE LLP**

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15 By: /s/ Lawrence Reichman

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18 Representing CenturyLink