



Oregon Citizens' Utility Board

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September 20, 2023

Public Utility Commission
Attn: Filing Center
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RE: UM 1908 – Oregon Citizens' Utility Board Comments on PUC Staff Report

The Oregon Citizens' Utility Board submits the following brief comments in response to the Commission Staff Report submitted in this docket on September 18, 2023. CUB appreciates that Commission Staff has brought the CenturyLink Jacksonville/Little Applegate Labor Day weekend outages issue before the Commission for its consideration. And CUB appreciates Staff's efforts to timely respond to customer complaints about these outages. However, CUB cannot agree with Staff's recommendation based upon the information provided in the Report alone. We believe more public process is necessary before a determination of compliance with Order No. 22-340, as modified by Order NO. 22-422 and affirmed in Order No. 23-109 ("the Orders") can be made.

As the Staff Report explains, the Orders require CenturyLink to address all tickets and make repairs within 48 hours of the creation of the ticket from the Jacksonville/Little Applegate service territories, specifically:

Lumen must address all tickets and make repairs in a manner that results in a consistent and functional dial tone and ability to reliably make and receive calls, or provide the customer with a functionally equivalent substitute service, as defined by Lumen's current tariffs, at no additional customer cost, within 48 hours of creation of the ticket until service issues in the area are remedied. Where repairs are not feasible because of a customer-premise issue preventing such dial tone and the ability to receive and make calls, Lumen must provide documentation of such issue to the customer and the Commission's Consumer Services Division.

The Orders also state that:

Lumen must track and retain information on all tickets generated through this customer support line. The information to be tracked must include but is not limited to the address, name, and contact information for the customer for whom the ticket has been generated; a description of the service issue, logs of customer contact regarding the service issue, actions taken to resolve the service issue, and information on the results. Dates and times for all of the foregoing information must be logged. This information must be tracked until the conclusion of the investigation.

It is unclear from the information provided in the Staff Report and the attachments whether customers experiencing the September 2 outage had their service restored prior to the September 3rd outage. It is unclear what the cause and remedy of the September 2 outage was and if this issue was the result of a new or ongoing issue. A quick review of CenturyLink's most recent compliance filing appears to show a few customers' service was not restored within 48 hours. Finally, as customers have explained in their complaints and as Ms. Weaver has detailed in her comments to the Commission on this matter, the toll-free number CenturyLink has provided does not appear to be working as CUB believes the Commission intended.

CUB believes a more transparent process is appropriate to determine whether or not CenturyLink was in fact in compliance with the Orders, particularly related to the September 2 outage. CUB believes it would be appropriate for the Company to make a filing demonstrating how it was following each aspect of the Commission's order related to the outage, with documentation. Then provide an opportunity for public comments and schedule this issue for a future public meeting to allow the Commission to decide whether CenturyLink has been in compliance with the Orders. CUB proposes the following schedule for the Commission's consideration:

- October 4, 2023: Deadline for Lumen to file compliance report
- October 11, 2023: Deadline for public comments
- October 17, 2023: Public Meeting for Commission review and compliance determination

Respectfully submitted,

/s/ Jennifer Hill-Hart

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Oregon Citizens' Utility Board