



February 26, 2019

Public Utility Commission of Oregon
201 High Street, SE, Suite 100
Salem, Oregon 97301-3398

RE: Advice No. 19-02 for United Telephone Company of the Northwest d/b/a CenturyLink,
OR PUC No. 4 Tariff (**AMENDMENT**)

Dear Commissioners:

Attached for electronic filing are the following revisions to the United Telephone Company of the Northwest d/b/a CenturyLink, OR PUC No. 4 Tariff. The following revisions are being submitted with a proposed effective date of March 14, 2019.

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This filing adds terms to describe the Company's process for establishing a residential customer's credit utilizing a credit scoring system. CenturyLink requests that the Commission approve these terms as compliant with Oregon Administrative Rule (OAR) 860-021-0200 1(b), which requires Commission approval for the use of a credit scoring system by a large telecommunications utility. Alternatively, pursuant to OAR 860-021-0005, CenturyLink respectfully requests that the Commission waive, to the extent necessary, the approval requirements of OAR 860-021-0200 1(b).

OAR 860-021-0005 provides: "Upon request or its own motion, the Commission may waive any of the Division 021 rules for good cause shown. A request for waiver must be made in writing, unless otherwise allowed by the Commission." Please consider this Advice such written request. A discussion of the good cause for which the Company makes this request follows.

The Company follows the Fair Credit Reporting Act in the collection and use of consumer credit information. CenturyLink utilizes a three-tier review process that creates a consistent method for assessing the level of potential risk an applicant poses and sets deposits equitably. This credit scoring system is not used to deny service. The first tier consists of review of CenturyLink or affiliated company payment history. The second tier is a proprietary CenturyLink model that evaluates consumer credit data provided by the Company's credit bureau vendors, Trans Union and Experian. The third tier consists of review of National Consumer Telecom and Utilities Exchange members payment history. Applicant credit scoring uses the lowest tier review possible to verify the appropriate deposit required. The Company does not make public the specific attributes utilized in the credit scoring model or the weightings that are assigned to each of the selected attributes. Similarly, credit bureaus and other providers of credit scores such as FICO and VantageScore do not make public the specific credit data attributes and credit scoring model calculations used to develop a credit score.

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Customers who do not want to pay a deposit can still subscribe to a restricted line that provides a toll restricted line and optional features of the customer's choice.

The Company uses the same credit scoring process in all 37 states where it operates as an ILEC. If the Company were required to utilize a different process in Oregon, it would create additional costs for the Company and possibly lead to a less than efficient process for signing up new customers for service.

If the Commission had to approve changes to the credit scoring model it could result in an administrative burden for the Commission and the Company.

The Company is in vigorous competition with many other carriers (wireless, cable, VoIP, fixed wireless, satellite) to gain and retain customers. However, all those competitors have the freedom to determine the best method for assessing a customer's credit worthiness and protecting themselves from credit risk and they use credit scoring models to accomplish this objective. None of the other 36 states where the Company is an ILEC regulate credit scoring.

If you have any questions regarding this filing, please contact Phil Grate at (206) 345-6224 or me at the contact information provided below.

Sincerely,



Robyn Crichton

cc: Phil Grate, CenturyLink

OR 19-05

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