

September 18, 2022

Commissioner Megan Decker, Chair
Commissioner Letha Tawney
Commissioner Mark Thompson
Oregon Public Utility Commission

Re: Supplement to original complaint dated November 21, 2021 in UM 2206

The complainants in this matter file this supplement to their original complaint to urge the PUC to adopt, and immediately implement, the final recommendation on page 8 of the Staff Report dated September 14, 2022, for consideration at the meeting noticed for September 20, 2022, at 9:30 a.m. The recommendation begins with the headline on page 8: *"Immediate Action to Address Outages in Jacksonville."*

Complainants asked for this relief – a direct, staffed telephone number for the CenturyLink/Lumen land line customers in the area addressed in UM 2206, including the areas served by RT 2900 and RT 2600 -- in their original complaint filed ten months ago (see below). In those ten months, over a dozen multi-day outages have occurred and each time, each individual customer is required to spend literally hours trying to get through to either an operator on the general 800 number or in a text "chat," precious hours that could have been devoted to CenturyLink actually repairing their equipment and making their system operational. Every time, the customer is told they cannot report a widespread outage and their only choice is to accept an individual repair ticket for a technician to come to their address, not to the various terminals implicated in a widespread outage. Every time they are told they must be home. Every time they are told a \$99 charge will apply if it is the customer's fault. Yadda, yadda, yadda.

There are dozens of examples of this ridiculously inefficient and dangerously slow way of reporting what is always an area wide outage. We attach but one example to this supplement, that of customers Hadden & Sartorio at 4035 Little Applegate Road, telephone 541-899-9513. Earlier this week, when their incoming phone calls dropped after a few words, they obediently contacted the general 800 number, patiently waited through all the stock language that does not apply to our repeated outages, and accepted a repair ticket. They stayed home all day on the assigned date, but no one showed up. To make matters worse, their outgoing calls also began to drop off. If a CenturyLink technician showed up somewhere to investigate their repair ticket, it only made matters worse. And so, early Friday morning (Sept 17), they initiated a "chat" with CenturyLink online. Their attempt to get the message across follows. Among other things, it took nearly an hour before the operator told them he couldn't help them because he was an internet technician, not a phone technician!

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Requiring CenturyLink/Lumen to provide a direct reporting line as outlined in the Staff Recommendation is fully warranted and long overdue. We respectfully request that the order be entered forthwith.

The screenshot shows a text message conversation on a mobile phone. The messages are as follows:

- 7:01 AM:** Please tell us about your recent CenturyLink repair experience! Has your service request been resolved to your satisfaction? Reply 1 for Yes or 2 for No.
- 7:46 AM:** 2. Saw no technician. Now I am unable to make outgoing phone calls. The service is worse than before we requested the repair.
- 7:53 AM:** CTL: Please reply "yes" to confirm you want to receive messages from us. Reply STOP to opt out of texts. Msg & data rates may apply.
- 7:53 AM:** Yes
- 7:53 AM:** CTL: Thanks for opting in and allowing us to send you messages. Reply STOP to opt out of texts. Msg & data rates may apply.
- 7:52 AM:** To save time when speaking with an agent can I go ahead and get your account information
- 7:52 AM:** Text...
1 - Yes
2 - No
- 7:52 AM:** There are several things I can help you with today. I am trained to answer commands and questions or route your chat to the proper team.
- 7:52 AM:** If this is not what you were looking for, please ask your question again, or ask to be connected to a live agent.
- 7:52 AM:** My "repair" made my service worse. I know I'm unable to make or receive phone calls. Please have a technician actually come to our home and fix our phone. Thank you
- 7:52 AM:** I can help you check the status of your service order.
- 7:52 AM:** To locate your order, I will need one of the following. Please select from the following options:
Text...
1 - Phone Number
2 - Order Number
3 - I don't have either
- 7:52 AM:** 541-899-9513
- 7:52 AM:** <https://serviceassistance.centurylink.com/ticketing/residential/submitWheresMyTechQuery.do?phoneNumber=5418999513&orderNumber=ticketNumber=&stateCode=>

Visit this link to view your order information.

If you'd like additional assistance, please select from the following options, or just type your next question:

Text...

- 1 - My appointment is past due
- 2 - I need to make a change
- 3 - Where's my modem
- 4 - I need the technician to return
- 5 - I did not schedule an appointment
- 6 - Agent
- 7 - All done!

Let's pull up your account details.

Please enter one of the following: Your account number, telephone number, or email address.



Thank You. Give me a moment while I pull up your account.

I understand you are inquiring about making an appointment.

What can I help you with today?

Text...

- 1 - I want to order new products or services
- 2 - I am moving to another address
- 3 - I need to schedule a repair of existing service

Please wait while I check for an available Agent. Typically, response is within a few minutes.

Okay

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Hi, I thank you for contacting CenturyLink. While I am pulling your account information, could you please help me with your alternate callback number?

your alternate callback number and account number?

541-941-2226

account number?

5418999513

Can you please tell me your service/billing address?

4015 Little Apple Gate Rd
Jacksonville OR 97530

Thank you for the details.

Nice to meet you. What can I do for you today?

A tech supposedly made a repair to our phone service yesterday. Today our service is worse and are now unable to make outgoing or receive incoming calls. Our previous problem was only that occasional calls got dropped now our service is worse than before our supposed repair. Nice to meet you today

I apologize, I mostly handle queries about internet issues. Can I get one of my tech experts to help you with this issue?

Yes, this is crazy this has always been a phone issue!

Original complaint to which the foregoing is a supplement:

November 21, 2021

Commissioner Megan Decker, Chair
Commissioner Letha Tawney
Commissioner Mark Thompson
Oregon Public Utility Commission

Re: Critical CenturyLink land line telephone issue in rural southern Oregon

Dear Commissioners Decker, Tawney, and Thompson:

We write as two of the approximately 60-80 households on Little Applegate and Yale Creek Roads near Jacksonville, Oregon. We need your help getting us reliable and consistent land line phone service so that we can access 911 in emergencies.

People's lives out here are at stake. Because we have only our CenturyLink land lines to reach 911 as described below, we are in an unusually vulnerable, perhaps unique, telecommunication "desert." Our land lines are ancient and unreliable and prone to multiple-household outages. To make matters worse, there is no battery backup during power outages. When outages are due to broken equipment, CenturyLink's repair response is slow and unpredictable, often taking many hours to initiate and then days stretching into months to complete. Every outage is a potential human disaster as we wait for our land line service to be restored ... again.

This is not hyperbole or hysteria. We have had ten widespread outages so far this year (listed below), one lasting for 4+ days, another for 8+ days! For us, this is a life and death matter, with a recent close call described below. Without your intervention, CenturyLink will not upgrade our lines nor restore the backups and safeguards that would lessen the risk of catastrophe for lack of access to 911.

HOW THE PUC CAN HELP US NOW

The permanent "fix" for our old copper land lines is replacement with fiber optic cable. For now, we ask you to exercise your authority over land lines by requiring CenturyLink to take the following steps to minimize outages and to provide prompt and effective repairs:

1. Restore the backup battery/generator safeguards that CenturyLink allowed to go dormant for failure to replace or maintain them. These are essential backup when an outage is due to an electrical power failure. CenturyLink's failure to keep this basic safeguard in place is knowing and puts our community at continuing, preventable risk.

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2. Restore the remote monitoring capability that was removed or allowed to become inoperable. It is our understanding that this system automatically alerts the land line provider when our phones go out so that repairs can be undertaken promptly. We need this automatic notification system because CenturyLink also will not provide us with a 24/7 dedicated phone line direct to the department at CenturyLink used for widespread outages and that has the authority to initiate immediate repair.

We further ask the PUC to put in place an ongoing monitoring or oversight mechanism to which we can turn if CenturyLink does not meet its obligations under the foregoing two points. Until fiber optic can be laid, we remain at the whim of CenturyLink's corporate priorities, which do not include maintaining reliable land line service. To the extent the PUC has issued fines to CenturyLink for failure to maintain in the past, the fines have not been effective.

JUSTIFICATION:

OUR LIVES DEPEND ON OUR LAND LINES

No cell service through towers. We are located in a small river valley with no good sight lines (geography). Our numbers are small compared to the larger, more lucrative markets (economics). For these reasons, there are no towers to provide us with direct cell phone service.

Broadband not robust enough to support cell service. Other than a few of us lucky enough to get in on the nascent StarLink satellite service still in the testing stage, none of us have access to internet/broadband strong enough to support cell service, much less 24/7 service. There is no fiber optic cable and the existing satellite services often hover around 1Mbs. You read that correctly – one. That leaves us at the mercy of our antiquated land lines.

Time-consuming, inefficient and ineffective reporting mechanism. When our land lines go out, and because we cannot reach 911, someone in the household other than the person having a heart attack or a stroke or respiratory failure or not as mortally injured in a car accident must drive a minimum of 12 and from some homes up to 25 minutes to the hamlet of Ruch. Ruch has a fire station and we usually are able to make cell phone calls in Ruch. Emergencies cannot wait, of course, for the hour it takes to make the 911 call and have help arrive. We are a tragedy waiting to happen, and a few weeks ago it almost did.

A frighteningly close call. The early morning of October 24, our neighbor Sandy E, who lives near the intersection of Little Applegate and Yale Creek Roads, experienced respiratory distress/failure. She was able to call 911 only because her land line happened to be working that day. It was determined an ambulance would take too long, so she was airlifted and taken to intensive care in Medford. Just one day later, October 25, our land lines went down because of faulty CenturyLink equipment. If Sandy's emergency had occurred that day, she would likely have died waiting for help that could not be summoned.

Was this really a close call? You bet. In fact, both our county's Citizen Alert Emergency Notification service and our local fire department have begun sending alerts when our phones are down, knowing almost none of us can call for help.

CENTURYLINK HAS NOT MET ITS OBLIGATIONS TO MAINTAIN ITS LAND LINES

The newest old copper cables carrying our land line signals were laid in the mid 1970s and a significant portion date back to the 1950s. CenturyLink has chosen not to upgrade this decaying system, nor do they provide us with either prompt or effective maintenance. Instead, CenturyLink has chosen to direct its energies to shedding its COLR obligations.

When our land lines went out the day after Sandy's life-threatening emergency, it took CenturyLink over four days to repair one card and one cable. Luckily, no one needed 911 during that time. Crisis avoided, but just barely.

Our longest outage so far this year, from August 30 through September 7, occurred because three broken green telephone "boxes" along Little Applegate Road took also took four days to repair. During those days, our lines went off and on unpredictably.



After the crews left on the Friday before Labor Day, the system could not be successfully restarted. It took another four+ days with no phone service – until the Tuesday after Labor Day – before they figured out how to hook up the system correctly. To put this in context, those three boxes had been broken, laying on their sides exposed to rain and wind and snow, covered only haphazardly with orange bags, since at least January, eight months earlier.

WE DO NOT HAVE A WAY TO QUICKLY REPORT OUTAGES AND INITIATE REPAIRS

As noted above, a remote (i.e., where we live) automatic reporting mechanism to alert the provider when an outage occurred is no longer operable in our area. Until at least four of us realize our phones are out and each drive down to Ruch and each call the general "hotline" for individual (e.g., the cat ate the phone cord in the kitchen) outages, CenturyLink doesn't even

know we have an issue, much less that it is, by definition, urgent. Precious hours are lost because the "hotline" will not accept the word of one customer that the problem is widespread. Nor will the hotline allow us to report our neighbors' outages to prove it is widespread and warrants immediate action.

We need the automatic monitoring system hooked back up or re-installed, or else we need a direct line, 24/7, to the department with authorization to initiate repairs immediately.

WHAT ABOUT RDOF AND OTHER BROADBAND INITIATIVES?

We are aware of the federal funding being made available to ameliorate rural broadband coverage issues. We plan to seek assistance from the appropriate federal authorities to make sure CenturyLink does not use taxpayer money to provide broadband "service" to our area that will not work within our geographic constraints. From our limited access to the inner workings of the RDOF contracting process and CenturyLink's statements to us about their intentions, we already have concerns.

However, and to be clear, our request to you at this time is limited to direct relief for our land lines right now. If the federal/state partnerships and/or interfaces for federal funding of broadband as a declared "essential service" become available to us, we will update this request as appropriate. But our need for access to 911 cannot wait for the federal activities to wind their way through the system to eventual implementation.

Thank you for your consideration of this request and for your service to all the people of Oregon. We stand ready to provide whatever additional information we can and to assist you in your deliberations in any way we can.

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**2021 OUTAGES TO DATE ON LITTLE APPLGATE AND YALE CREEK ROADS
NEAR JACKSONVILLE, OREGON**

January 27-28	"major cable break"
March 6	possibly due to power outage, but no backup
March 15	working on the three "boxes," but not fixed
June 10	cause unknown to us
June 28-29	"cable issue"
August 3-4	cause unknown to us
August 30- Sept 7	"box" repair plus inability to re-connect system
Sept 30	cause unknown to us
Oct 25-29	"cable issue and bad card in the remote terminal"
November 9	cause unknown to us

Notes: We do not have a headcount for exactly how many homes were without service for each outage but we know each outage was multiple. Nor do we know exactly how many homes have CenturyLink land lines; no other provider has land lines in this area. Some of the outages may have been triggered by rain getting into CenturyLink's unmaintained equipment or by electric power failures for which a functioning battery/generator backup could have taken over.