

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: April 11, 2022

TO: File through Marc Hellman and Bruce Hellebuyck

FROM: Joseph Bartholomew

SUBJECT: CENTURYTEL OF OREGON, INC dba CENTURYLINK and CENTURYTEL OF EASTERN OREGON dba CENTURYLINK: (Docket No. ADV 1368/Advice No. 375). Grandfathers two Competitive Response Offers for Residential Customers

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, CenturyTel of Oregon, INC dba CenturyLink (CenturyLink) and CenturyTel of Eastern Oregon dba CenturyLink (CenturyLink) proposes to grandfather two Competitive Response offers for residential customers. Changes were made to the following page of the OR PUC No. 6 Tariff:

Section 5, Page 19, 1st Revision

The filing was submitted on February 4, 2022, with a proposed effective date of March 9, 2022.

Applicable Law

Telecommunications utilities are required under ORS 759.175 to submit tariff filings to the Commission whenever they intend to change their rates, terms, or conditions of service.

On September 28, 2018, with Order No. 18-359 (Docket No. UM 1908), the Commission approved a Price Plan applicable to both CenturyLink and its affiliates, Qwest Corporation dba CenturyLink QC, United Telephone Company of Northwest dba CenturyLink, and CenturyTel of Eastern Oregon d/b/a CenturyLink, as allowed by ORS 759.255. Section 8.a.ii of CenturyLink's Price Plan requires price list changes to be filed with the Commission at least one day prior to the effective date of the change. Section 8.b of the Price Plan requires CenturyLink to provide customers with 30-day notice of changes to terms or conditions of service.

Pursuant to OAR 860-032-0020(1)(d), "grandfather" means "to discontinue or cease offering a service to new customers and to continue offering the service to existing customers." OAR 860-036-0020(1)(k) defines "sunset date" as "the day a

telecommunications provider will abandon a grandfathered service being provided to existing customers."

Pursuant to OAR 860-032-0020(15)(a), grandfathering a service without a sunset date is not considered abandonment of service. OAR 860-032-0020(15)(b) allows a telecommunications utility to grandfather a regulated service without a sunset date by filing a tariff which designates the service as grandfathered. Normal tariff filing and review requirements apply to Staffs consideration of such filings, including review for compliance with any applicable Price Plan.

Analysis

This filing grandfathers two Competitive Response offers, Waiver of Access Line Service Connect charges and Simple Choice Unlimited \$10.00 for 12 Offer. Availability to current customers is limited to lines in service at existing locations.

Waiver of Access Line Service Connect charges is when new residence customers who are contacted by the Company or who contact the Company and request this offer establish a new account that includes an access line, the Company will waive the service charges that are otherwise applicable (excluding inside wire, construction or CPE installation) when the customer agrees to retain service for 12 months. This waiver will only apply to the primary access line. The benefits awarded under this offer will not be rescinded if the customer disconnects the qualifying service prior to the 12-month commitment period.

Simply Choice Unlimited \$10.00 for 12 offer is an existing Simple Choice Unlimited program under which customers may be eligible for a \$10 bill credit for 12 months when they contact the Company to disconnect service and agree to retain service with the Company. To be eligible, the customer must agree to subscribe to the Company's Simple Choice Unlimited for a minimum of 12 months. The initial bill credit will be reflected on the customer's first or second invoice following the customer's acceptance of this offer and will continue for 11 consecutive months thereafter. If a customer discontinues Simple Choice Unlimited prior to the end of the 12 month period, no additional credits will be applied. In no event will the application of this discount be used in conjunction with any other credits to take the customer's billed amount below zero.

Compliance

This filing complies with all applicable laws, rules, and Commission orders. The filing proposes no sunset date for the grandfathered services, and CenturyLink states that the services will continue to be available to existing subscribers.

The filing was submitted at least one day prior to its effective date, and customers were notified 30 days prior to the effective date therefore this filing complies with the requirements of ORS 759.175 and Section 8a11 of CenturyLink's Price Plan.

Conclusion

The filing should be allowed to go into effect, and an acknowledgment letter should be sent. No further action is necessary.

CenturyLink.Advice No 375.Grandfathering.