

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: May 19, 2022

TO: File through Marc Hellman and Bruce Hellebuyck

FROM: Steph Yamada

SUBJECT: UNITED TELEPHONE COMPANY OF THE NORTHWEST:
(Docket No. PL 202/Advice No. 22-003) Increases rates for Business One-Party and Measured Exchange Services, Packages and Bundles, Directory Listings, Other Services, and the Maximum Trouble Isolation Charge.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, United Telephone Company of the Northwest d/b/a CenturyLink (Company or United) implements various rate increases.

Applicable Rule or Law

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

United is regulated under a Price Plan pursuant to ORS 759.255 and Order No. 18-359 in Docket No. UM 1908. Section 8.a.ii of the Price Plan requires United to file notice of all price list changes with the Commission at least one day prior to the effective date of the change.

Section 1.g of the Price Plan defines "Primary Line Basic Service" as "the first line only of basic local exchange service for an individual residential or business customer account at a single location that is not sold as part of a package." Pursuant to Section 4.f of the Price Plan, recurring charges for business Primary Line Basic Service will not be subject to price caps. However, United's rate for this service is limited to the rate charged by Qwest Corporation in Rate Group 2.

Section 1.d of the Price Plan defines "Packages and Bundles" as "any combination of services, which may include residential or business basic local exchange service as well as other services at a combined price." Pursuant to Section 4.r of the Price Plan, the Company may offer Packages and Bundles, subject to the below conditions:

- i. All regulated telecommunications services offered as part of a package or bundle shall remain separately available for purchase from CenturyLink's rate

schedules.

- ii. The package or bundle price shall not exceed the sum of the stand-alone retail prices of all available services in the package or bundle.

Section 1.c of the Price Plan defines “Other Services” as “any other residential or business services contained in CenturyLink's Rate Schedules that are not specifically addressed in this Price Plan.” Pursuant to Section 4.k of the Price Plan, monthly rates for Other Services for business customers will not be subject to price caps. Monthly rates for Other Services for residential customers may increase up to 50 percent or \$.50 annually, whichever is greater. The cumulative price increase for any Other Service over a four-year Plan term may not exceed 200 percent for residential customers.

Pursuant to Section 4.h of the Price Plan, United will provide at no additional charge the first Directory Listing included with Primary Line Basic Service, including those within Packages and Bundles. Additional listings beyond the initial listing are price capped with increases limited to not more than 25 percent per Plan year.

Pursuant to Section 4.l of the Price Plan, prices that are identified as at actual cost in the Company's rate schedules as of August 3, 2018, will continue to be priced at actual cost.

Section 8.b of the Price Plan requires the Company to provide 30-day notice of price increases to affected customers.

Analysis

The filing was submitted on April 13, 2022, with a proposed effective date of April 15, 2022, in compliance with the filing requirements stated in the Price Plan. The Company states that customers were notified of the price changes implemented with this filing, as required by the Price Plan.

Business Primary Line Basic Service

The proposed changes to business Primary Line Basic Service rates are summarized in Table 1 below.

Table 1: Business Primary Line Basic Service

Service	Current Price	Proposed Price	Price Change
One-Party Flat Rate	\$35.00	\$39.00	\$4.00
One-Party Measured	\$25.00	\$29.00	\$4.00

These rate increases comply with the requirements of the Price Plan, under which Primary Line Basic Service rates for business customers are uncapped. The proposed rates do not exceed the rates charged by Qwest Corporation in Rate Group 2. The Company does not propose changes to Primary Line Basic Service rates for residential customers with this filing.

Packages and Bundles

The proposed rate changes to packages and bundles are summarized in Tables 2-3.

Table 2: Residential Packages & Bundles

Service	Current Price	Proposed Price	Price Change
Ideal Solution	\$42.00	\$45.00	\$3.00
Sure Solution I	\$42.00	\$45.00	\$3.00
Sure Solution II	\$39.00	\$42.00	\$3.00
Custom Solution 1	\$39.00	\$42.00	\$3.00
Choice Solution	\$37.00	\$40.00	\$3.00
Standard Solution II	\$32.00	\$35.00	\$3.00
Basic Solution	\$42.00	\$45.00	\$3.00
Classic Solution	\$39.00	\$42.00	\$3.00
Core Solution	\$49.00	\$52.00	\$3.00
Clear Solution	\$49.00	\$52.00	\$3.00
Personal II Solution	\$44.00	\$47.00	\$3.00
Home II Solution	\$37.50	\$40.50	\$3.00
Safe and Sound Solution II	\$32.00	\$35.00	\$3.00
Progressive Plan	\$37.50	\$40.50	\$3.00
Simple Solution	\$32.00	\$35.00	\$3.00
Standard Home Phone II	\$44.00	\$47.00	\$3.00
Progressive II Plan	\$37.50	\$40.50	\$3.00
Follow Me Plan	\$38.00	\$41.00	\$3.00
Essential Home Phone	\$37.00	\$40.00	\$3.00
Simple Choice Unlimited	\$34.95	\$37.95	\$3.00
Simple Choice Unlimited with Voicemail and Unlimited Long Distance	\$33.95	\$36.95	\$3.00
Simple Choice Unlimited with HSI and Unlimited Long Distance	\$29.95	\$32.95	\$3.00
Simple Choice Unlimited with HSI, Voicemail and Unlimited Long Distance	\$28.95	\$31.95	\$2.00
Economy Pack	\$36.95	\$39.95	\$3.00
Economy Pack Plus	\$32.00	\$35.00	\$3.00

Table 3: Business Packages & Bundles

Service	Current Price	Proposed Price	Price Change
Sure Solution II	\$53.00	\$57.00	\$4.00
Choice Solution	\$47.00	\$51.00	\$4.00
Standard Solution II	\$41.00	\$45.00	\$4.00
Classic Solution	\$50.00	\$54.00	\$4.00
Priority Solution	\$47.00	\$51.00	\$4.00
Economy Bundle IIA	\$45.00	\$49.00	\$4.00
Rotary Classic Solution	\$48.00	\$52.00	\$4.00
Economy Solution	\$42.00	\$46.00	\$4.00
Connected II	\$53.00	\$57.00	\$4.00
Economy Bundle IIB	\$45.00	\$49.00	\$4.00
Business Assist Advantage	\$59.00	\$63.00	\$4.00
Business Assist Adv Add Line	\$54.00	\$58.00	\$4.00
Business Assist Unlimited Initial	\$60.00	\$64.00	\$4.00
Business Assist Unlimited Add	\$54.00	\$58.00	\$4.00

All regulated services offered as part of these packages and bundles remain separately available for purchase from the Company's rate schedules. The Company provided analyses demonstrating that the new rate for each package or bundle does not exceed the sum of the stand-alone retail prices of all available services in the package or bundle. The proposed rate changes comply with the requirements of the Price Plan.

Other Services

The proposed changes to Other Services rates are summarized in Tables 4 and 5.

Table 4: Residential Other Services

Service	Current Price	Proposed Price	Price Change	12-Month Percent Change	Cumulative Percent Change
Call Waiting	\$7.00	\$8.00	\$1.00	14.29%	113.33%
Call Waiting with Options	\$7.00	\$8.00	\$1.00	14.29%	113.33%
Remote Call Forwarding	\$18.50	\$21.50	\$3.00	16.22%	104.76%
Two-Point Messaging Service					
Customer-Dialed Calling Card	\$0.50	\$0.75	\$0.25	50.00%	50.00%
Operator -Assisted Station to Station	\$1.25	\$1.85	\$0.60	48.00%	48.00%
Operator-Assisted Person-to-Person	\$3.00	\$4.50	\$1.50	50.00%	50.00%

The proposed rate increases to Other Services for residential customers do not exceed the greater of 50 percent or \$0.50 annually. The cumulative rate increases from the start of the Plan term do not exceed 200 percent. These rate increases comply with the requirements of the Price Plan.

Table 5: Business Other Services

Service	Current Price	Proposed Price	Price Change
Key Line Flat Rate	\$35.00	\$39.00	\$4.00
Key Line Measured	\$25.00	\$29.00	\$4.00
PBX Trunk Flat Rate	\$35.00	\$39.00	\$4.00
PBX Trunk Measured	\$25.00	\$29.00	\$4.00
Joint User Service	\$12.00	\$14.00	\$2.00
Call Waiting	\$7.00	\$8.00	\$1.00
Call Waiting with Options	\$7.00	\$8.00	\$1.00
Remote Call Forward	\$23.00	\$26.00	\$3.00
Two-Point Messaging Service			
Customer-Dialed Calling Card	\$0.50	\$0.75	\$0.25
Operator -Assisted Station to Station	\$1.25	\$1.85	\$0.60
Operator-Assisted Person-to-Person	\$3.00	\$4.50	\$1.50

These rate increases comply with the requirements of the Price Plan, under which Other Services rates for business customers are uncapped.

Directory Listings

The proposed changes to Directory Listings rates are summarized in Table 6.

Table 6: Directory Listings

Residential or Business	Service	Current Price	Proposed Price	Price Change	12-Month Percent Change
Residential	Additional Listings	\$4.00	\$5.00	\$1.00	25.00%
Residential	Foreign Listing	\$4.00	\$5.00	\$1.00	25.00%
Business	Additional Listings	\$4.00	\$5.00	\$1.00	25.00%
Business	Foreign Listing	\$4.00	\$5.00	\$1.00	25.00%
Business	Secretarial listing	\$6.25	\$7.25	\$1.00	16.00%

The rate increases do not exceed 25 percent in the current Plan year and therefore comply with the requirements of the Price Plan.

Cost-Based Charges

While the Company's Trouble Isolation Charge applicable to individual business lines and trunks is cost-based, the Price List currently caps the maximum amount for this charge at \$85.00 per service call. With this filing, the Company proposes to increase the maximum Trouble Isolation Charge applicable to business lines and trunks by \$14.00, from \$85.00 to \$99.00 per service call. Because the rate will remain cost-based and will not result in customers being charged more than the actual cost of providing the service, Staff finds that this change complies with Section 4.1 of the Price Plan.

Other Changes

This filing also removes grandfathering footnotes from SignalRing, Speed Dial (8-number), and Three Way Calling. The Company states that these services were previously grandfathered in error.

Conclusion

This filing complies with all applicable laws and Commission orders. The filing has already gone into effect and an acknowledgment letter should be sent. No further action is necessary.