

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: June 22, 2022

TO: File through Marc Hellman and Bruce Hellebuyck

FROM: Joseph Bartholomew

SUBJECT: UNITED TELEPHONE COMPANY OF NORTHWEST dba CENTURYLINK: (Docket No. PL 205/Advice No. 22-004). Grandfathers two competitive response offers, deletes previously grandfathered Pure Bundle.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, United Telephone Company of Northwest dba CenturyLink (CenturyLink) proposes to grandfather two competitive response offers for residential customers, Waiver of Access Line Services Connect Charges and Simple Choice Unlimited \$10 for 12 Offer. CenturyLink is also deleting a previously grandfathered service, Pure Bundle \$5 for 12 or 24. The filing makes changes to the following OR PUC Price List No. 102 pages:

Section	Revision	Sheet
16	2nd	17
16	4th	18

The filing was submitted on April 27, 2022, with a proposed effective date of May 1, 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, CenturyTel of Oregon d/b/a CenturyLink, and CenturyTel of Eastern Oregon d/b/a CenturyLink, as allowed by ORS 759.255. Section 8a 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.

Pursuant to OAR 860-032-0020(8), a telecommunications utility may request to abandon a regulated service for which there are no current customers by filing a tariff change which deletes the regulated service along with a cover letter or advice letter which clearly and explicitly discloses which regulated service the telecommunications utility proposes to abandon

Analysis

This filing grandfathers two Competitive Response offers for residence customers, Waiver of Access Line Services Connect Charges and Simple Choice Unlimited \$10 for 12 Offer. Availability to current customers is limited to lines in service at existing locations. Also, the previously grandfathered Pure Bundle \$5 for 12 or 24 is being deleted as it no longer has customer demand.

Compliance

This filing complies with all applicable laws, rules, and Commission orders. The filing was submitted at least one day prior to its effective date therefore this filing complies with the requirements of ORS 759.175 and Section 8aii of CenturyLink's Price Plan. This filing also complies with OAR 860-032-0020(15)(a) (grandfathering of services), and OAR 860-032-0020(8) (abandonment of services).

Conclusion

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