

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: May 19, 2022

TO: File through Marc Hellman and Bruce Hellebuyck

FROM: Steph Yamada

SUBJECT: QWEST CORPORATION:
(Docket No. PL 207/Advice No. 2022-006) Adds clarifying language to the Qwest Choice Home packaged service.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, Qwest Corporation d/b/a CenturyLink QC (Company or Qwest) adds clarifying language to the Qwest Choice Home packaged service.

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.

Qwest 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 Qwest 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.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.

Analysis

The filing was submitted on May 19, 2022, with a proposed effective date of May 27, 2022, in compliance with the filing requirements stated in the Price Plan. The filing is related to Docket No. PL 203/Advice No. 2022-004, in which the Company

increased rates for various packaged services. In that docket, Staff requested from the Company an analysis demonstrating that the new rate for each package or bundle does not exceed the sum of the stand-alone retail prices of the included services. The provided analysis revealed that the residential Qwest Choice Home package identified with Universal Service Order Code (USOC) PGO1H could be configured such that the proposed package rate would exceed the sum of the individual retail prices of the included services, depending on the specific features selected by the customer. Specifically, if a customer was subscribed to the lowest priced features available under the package, the sum of the standalone retail prices would total \$43.80, compared to the proposed package price of \$45.00 per month. The Company stated that out of 2,853 current subscribers to the package, eight customers have combinations that would be less expensive if purchased separately.

To align the package price with the terms of the Price Plan, the Company subsequently submitted the present filing, which adds language to the Qwest Choice Home package to clarify that subscribers to the package will be charged the lower of the package rate or the sum of the standalone retail prices of the components included in the package. However, after the present filing became effective, the Company discovered that the eight previously-identified customers had been identified in error. Specifically, all eight customers are subscribed to Security Screen as one of the optional features included with the package. Under the terms of the package, subscribers to Security Screen must also subscribe to Caller ID – Name and Number, which has a standalone rate of \$10.00 rather than the previously-identified least cost rate of \$6.00. As such, no customers are subscribed with combinations that would be less expensive if purchased separately. While this correction renders the present filing unnecessary, Staff does not find that any harm will result from it having become effective. Staff notes that because the affected package was grandfathered in 2010, this change is not expected to impact any customers in the future.

Conclusion

This filing complies with all applicable laws and Commission orders. The filing should be allowed to become effective and an acknowledgment letter should be sent. No further action is necessary.