

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: January 30, 2023

TO: File through Bryan Conway and Marc Hellman

FROM: Steph Yamada

SUBJECT: UNITED TELEPHONE COMPANY OF THE NORTHWEST:
(Docket No. PL 215/Advice No. 23-001)
Grandfathers a Competitive Response offer.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, United Telephone Company of the Northwest dba CenturyLink (United or Company) grandfathers a Competitive Response offer.

Issue

Whether the price list sheets filed by United should be allowed to become effective for service rendered on and after February 22, 2023.

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.

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 860-032-0020(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 filing and review requirements apply to Staff's consideration of such filings, including review for compliance with any applicable Price Plan.

Analysis

The filing was submitted on January 19, 2023, with a proposed effective date of February 22, 2023, in compliance with the filing requirements stated in United's Price Plan.

With this filing, United grandfathers the \$5 for 6 Competitive Response offer. Under this offer, existing residential customers could be eligible for a \$5 bill credit for six months when they contact the Company to disconnect access line service and agree to retain service with the Company. Effective February 22, 2023, this offer will no longer be available to customers and will be limited to existing lines at existing service locations.

Conclusion

This filing complies with applicable laws and the provisions of United's Price Plan. The filed price list sheets should be allowed to go into effect, and an acknowledgement letter should be sent. No further action is necessary.