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**VIA E-MAIL**  
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Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

January 10, 2021

Re: Docket No. UM 2206 – Comments of Lumen Technologies, Inc.

Dear Commission:

Lumen Technologies on behalf of Qwest Corporation d/b/a CenturyLink (“Lumen”) provides these comments in response to the Oregon Public Utility Commission Staff’s memorandum, dated December 2, 2021. Lumen acknowledges that it has faced challenges in maintaining the network in the Jacksonville area, and specifically the portion of that network that serves its remaining customers on Little Applegate Road and Yale Creek Road (“Little Applegate”). Lumen has taken recent steps to enhance network monitoring and to “harden” the network including cable repair, replacement of pedestals, and remote terminal (“RT”) maintenance which will include replacement of all batteries. Together these processes and repairs will significantly enhance the reliability of the network until a permanent and robust alternative is implemented.

While Lumen’s activities to address the recent outages will significantly improve the service reliability for voice customers in this area, as has been expressed by many of these customers, we recognize that in addition reliable voice service, they are seeking a better broadband connection. The cost to deploy fiber to this area is not economically feasible without funding support. For this reason, the company bid for FCC RDOF funding to bring fiber to the area and was awarded funding under the program. Final approval from the FCC is pending at this time but is expected in early January. In the interim Lumen is working diligently to determine exactly which locations in Little Applegate would be covered by the RDOF award, and how quickly funding can be deployed to replace the network in the area.

Lumen has enhanced the reliability of the existing network in Little Applegate and it anticipates the ability to bring a plan to the Commission for a comprehensive solution in the very near future. Lumen respectfully requests that the Commission postpone its consideration of Staff’s recommendation until a January Open Meeting, thereby affording Lumen a small amount of time to return to the Commission with a proposed solution.



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The challenges associated with maintaining and upgrading rural copper legacy networks are not unique to Oregon or to Lumen. This fact has led Congress to approve more than \$60 billion beyond that set aside for the RDOF program in the last year for states to make investment in broadband infrastructure to close the digital divide. We look forward to partnering with the State of Oregon to ensure that those funds are targeted to unserved and underserved communities.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Tre Hendricks". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tre Hendricks  
Director and Associate General Counsel

cc: Megan Decker, Chair (via e-mail)  
Letha Tawney, Commissioner (via e-mail)  
Mark Thompson, Commissioner (via e-mail)  
Michael Grant, Executive Director (via e-mail)