PUBLIC UTILITY COMMISSION OF OREGON INTEROFFICE CORRESPONDENCE

DATE:	February 10, 2017
TO:	File through Bryan Conway and Bruce Hellebuyck
FROM:	Stephen Hayes

SUBJECT: <u>Qwest Corporation</u>: (Docket No. ADV 501/Advice No. 2134) Makes compliance filing pursuant to FCC Order 16-38, Adopted April 27, 2016 and OPUC Order No. 16-448, OTAP Rulemaking, 11/23/2016.

BACKGROUND

I have reviewed this filing and recommend that an acknowledgement letter be sent.

The filing was submitted on January 20, 2016, proposing a February 22, 2017, effective date.

Qwest is regulated under a price plan pursuant to ORS 759.255 and Order No. 14-346, issued October 3, 2014. Section C of Qwest's price plan states that Qwest "will continue to offer current Telephone Assistance Plans (OTAP, Tribal Lifeline, and Tribal Link-Up) pursuant to state and federal requirements."

The CenturyTel and United tariffs, affiliates with Qwest, do not require changes because previously the Commission approved adoption by reference of those Lifeline related tariff sections to Qwest's tariff and this correction is only necessary for Qwest's billing system. Please refer to the memo-to-file dated December 28, 2016 filed in Docket ADV 441/Advice No. 2133 for additional background.

DESCRIPTION OF PROPOSED TARIFF CHANGE

Qwest Corporation (Qwest) proposes to revise the Lifeline tariff by changes compliant with the Public Utility Commission of Oregon Order 16-448, in the Matter of Revisions to Rules in Division 033 to Implement FCC's Lifeline Modernization, entered on November 23, 2016.

This filing corrects an error in the Qwest Tariff No. 33 Exchange and Network Services, in the footnote No. 2 of Sheet 58.1 which was treated as a compliance filing in Docket ADV 441. The correction removes the \$1.00 charge from the exchange specific credit amounts for the Tribal Lands Lifeline credit inadvertently left in the filing related to Advice No. 2133.

Staff understands the proposed correction is consistent with FCC and OTAP rules as required in Qwest's Price Plan. Further, staff confirmed with the Company that no customer was charged incorrectly due to this error.

For the reasons explained above this tariff change filing is viewed as a compliance filing and did not go to a public meeting.