



**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: December 13, 2018

TO: File through Bryan Conway and Bruce Hellebuyck 

FROM: Stephen Hayes 

SUBJECT: QWEST CORPORATION: (Docket No. PL 104/Advice No. 2018-007-PL)
Discontinue Call Event and Management Signaling Service

STAFF RECOMMENDATION:

Staff recommends that Qwest Corporation's (dba CenturyLink) Price List filing be acknowledged.

DISCUSSION:

Issue

Allow Qwest Corporation (Qwest, CenturyLink, or Company) the effective discontinuance of Ethernet with extended transport (EwET) to go into effect by advice filing.

Applicable Law

Normally Oregon Revised Statutes (ORS) 759.190 would apply which requires tariff filings to be made at least thirty days prior to their effective date. CenturyLink is regulated under alternative price plan regulation pursuant to ORS 759.255. The Commission approved the Price Plan in effect when the filing was made by Order No. 18-359 on September 28, 2018. Under the terms of the Price Plan as specifically allowed by ORS 759.255 Qwest is exempt from ORS 759.190 and is only required to file changes to its price listed services on one day notice.

The Commission's *Abandonment of Service* rule requires customer noticing except in certain circumstances. One of those exceptions is when there are no current customers. In that case a utility may abandon a service by tariff filing.

OAR 860-032-0020(8), states:

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

The Company filed its advice letter 2018-007-PL along with Price List Changes pursuant to Qwest's Price Plan on November 29, 2018 with an effective date of November 30, 2018. The Price Plan does not have any special allowances or instruction relative to the filing. On November 30, 2018 Qwest supplemented its filing with a revised advice letter to revise the filing pursuant to Oregon Administrative Rule (OAR) 860-032-0020(8).

Although the company is discontinuing CEMSS, it is not required to file a petition to abandon service under OAR 860-032-0020 because it states that it has no customers subscribing to this service. Consequently, it qualifies under section 8 of the rule to discontinue the service by tariff filing.

Background

Qwest's EwET service was used to extend service outside the normal service area of Metro Optical Ethernet (MOE). MOE is a flexible, easy to use transport service that uses established Ethernet transport technology. MOE allows customers to connect multiple enterprise locations within a service area using native Ethernet protocol. The other two remaining designs of MOE are Customer Premises and Central Office types. Each design type supports different transmission speeds. EwET supported the mid-range of transmission speeds.

The Company states that the equipment associated with EwET has been discontinued by the manufacturer.

Conclusion

Staff concludes that Qwest customers would not be deprived of EwET. Since there are apparently no current customers this filing would have no revenue effect.