## OREGON PUBLIC UTILITY COMMISSION INTEROFFICE CORRESPONDENCE

DATE:	March 6, 2019
то:	File through Bryan Conway and Bruce Hellebuy
FROM:	Stephen Hayes
SUBJECT:	<u>QWEST CORPORATION</u> : (Docket No. PL111/Advice No. 2019-002-PL) Grandfathers Essential Home Phone with 30 Minutes Long Distance

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

The filing was submitted on February 15, 2019, and will go into effect on February 18, 2019. Qwest Corporation (Qwest) d/b/a CenturyLink QC proposes to grandfather Essential Home Phone with 30 Minutes Long Distance package which was available to residential customers. Under the CenturyLink Price Plan (Docket No. UM 1908, Order No. 18-359, dated September 28, 2018) CenturyLink companies may file changes to price-listed services with one day notice.

Unlimited Nationwide Calling or Essential Home Phone with 30 Minutes Long Distance is an optional enrollment plan that allows residence customers who subscribe to qualifying products and service to receive local exchange service and additional features and services for a flat monthly rate. Residential customers must subscribe to the following services provided by CenturyLink or a CenturyLink affiliate: Home Phone Extra Package; Unlimited Nationwide Calling or 30 Minutes Long Distance calling, and; CenturyLink's 1.5 Mbps or greater High Speed Internet.

The tariff filing states that effective February 18, 2019, Essential Home Phone With 30 Minutes Long Distance is grandfathered. Availability to current customers is limited to lines and features in service at existing locations. The Advice Letter does not state as in some cases that there is no change to the rates *with this filing* or to the service for existing customers for the life of their existing contract if they continue to meet the terms of their contracts.

The filing changes Qwest's Oregon Price List, Exchange and Network Services, Fourth Edition, Section 5, Exchange Services, subsection 11.4, 2<sup>nd</sup> Revised Sheet 186 and following sheets. Normally a grandfathered service would show the service moved into Qwest's Oregon Price List, Exchange and Network Services, Fourth Edition, Section 105 which is referred to as obsolete services. The company may have a reason for not moving it at this time.

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A telecommunications utility is allowed, under Oregon Administrative Rules (OAR) 860-032-0020(15), to grandfather a service without a sunset date by filing a tariff which designates the filing as grandfathered. Grandfathering a service without a sunset date is not considered abandonment of service under the rule. No sunset date is proposed in this filing for the grandfathered services and therefore, this filing does not constitute an abandonment of service under the Commission's rules.

This filing will have little or no effect on annual revenues and complies with Price Plan noticing requirements and applicable Commission rules relating to grandfathering services.

Qwest.2019.002.PL. Grandfathers Unlimited Nationwide Calling or Essential Home Phone with 30 Minutes Long Distance Package