OREGON PUBLIC UTILITY COMMISSION INTEROFFICE CORRESPONDENCE

DATE:

March 6, 2019

TO:

File through Bryan Conway and Bruce Hellebuyc

FROM:

Stephen Hayes

SUBJECT:

UNITED TELEPHONE COMPANY OF THE NORTHWEST: (Docket

No. PL113/Advice No. 19-002) Grandfathers Unlimited Nationwide Calling

or 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. United Telephone Company of the Northwest d/b/a CenturyLink (Company or United) 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 affects United's Oregon Price List, Exchange Services, Section 5, Exchange Services, subsection A, 2nd Revised Page 83 and following sheets.

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

United Advice No. 19-002 March 6, 2019 Page 2

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.

United.19.002. Grandfathers Unlimited Nationwide Calling or Essential Home Phone with 30 Minutes Long Distance Package