

**OREGON PUBLIC UTILITY COMMISSION  
INTEROFFICE CORRESPONDENCE**

**DATE:** May 11, 2021

**TO:** File through Michael Dougherty and Bruce Hellebuyck

**FROM:** Russ Beitzel

**SUBJECT:** United Telephone Company of the Northwest: (Docket No. PL167/Advice No. 21-003). Increases various base rates and grandfathers various services.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, United Telephone Company of the Northwest dba CenturyLink (United or Company) proposes to increase various base rates and grandfather various services.

Issue

Whether the rate changes proposed by United should be allowed to become effective for service rendered on and after April 9, 2021.

Applicable Rule or Law

Telecommunications utilities are required under ORS 759.175 to submit filings to the Commission whenever they intend to change their rates, terms, or conditions of service.

United is regulated under a Price Plan pursuant to ORS 759.255 and Order No. 18-359 in Docket No. UM 1908. Section 8.a.ii of the Price Plan requires United to file all price list changes with the Commission at least one day prior to the effective date of the change. Section 8.b of the Price Plan requires United to provide customers with 30-day notice of price changes.

Pursuant to Section 4.f of the Price Plan, monthly rates for various Business Basic Services, including One-party, Key Line, PBX Trunk, Call Forward, Call Waiting, Disc Call Waiting, Disc Three-way and Joint User, are not subject to price caps.

Pursuant to Section 4.h of the Price Plan, monthly rates for Directory Listings, including, Residential, Foreign, Additional, Secretarial and Alpha listings, may increase 25 percent annually.

Pursuant to Section 4.k of the Price Plan, monthly rates for residential Other Services, including Call Forward, Call Waiting, Signal Ring, Disc Call Forward and Remote Call forwarding, may increase by the greater of 50 percent or \$.50 annually, but may not

increase by more than 200 percent over any four-year Plan term. Monthly rates for 'Other Services' for business customers will not be subject to price caps.

Pursuant to Section 4.r.ii of the Price Plan, the package or bundle price shall not exceed the sum of the stand-alone retail prices of all available services in the package or bundle.

Pursuant to OAR 860-032-0020(15)(a), grandfathering a service without a sunset date is not considered abandonment of service. OAR 860-032-0020(15)(b) allows a telecommunications utility to grandfather a regulated service, without a sunset date, by filing a tariff which designates the service as grandfathered. Normal tariff filing and review requirements apply to Staff's consideration of such filings, including review for whether the filing is consistent with an applicable Price Plan and relevant PUC orders.

### Analysis

This filing was submitted on April 6, 2021, with a proposed effective date of April 9, 2021, in compliance with the filing requirements stated in United's Price Plan. The rate changes proposed with the present filing are summarized below.

### *Rate Increases*

United's proposed changes to various rates that have increase caps are summarized in the table below.

<b>Service</b>	<b>Pre-Plan Rate</b>	<b>Current Rate</b>	<b>Proposed Rate</b>	<b>Current Year \$ Change</b>	<b>Current Year % Change</b>	<b>Cumulative Plan % Change</b>
Addit Listing Res <sup>1</sup>	\$2.25	\$3.50	\$4.00	\$0.50	14.29%	NA
Foreign Listing Res <sup>1</sup>	\$2.25	\$3.50	\$4.00	\$0.50	14.29%	NA
Alpha Listing Res <sup>1</sup>	\$6.00	\$8.00	\$9.00	\$1.00	12.50%	NA
Addit Listing Bus <sup>1</sup>	\$2.25	\$3.50	\$4.00	\$0.50	14.29%	NA
Foreign Listing Bus <sup>1</sup>	\$2.25	\$3.50	\$4.00	\$0.50	14.29%	NA
Alpha Listing Bus <sup>1</sup>	\$6.00	\$8.00	\$9.00	\$1.00	12.50%	NA
Sectr Listing Bus <sup>1</sup>	\$3.50	\$5.25	\$6.25	\$1.00	19.05%	NA
Call Forward NoAns <sup>2</sup>	\$1.75	\$2.50	\$3.00	\$0.50	20.00%	71.43%
Call Forward Busy <sup>2</sup>	\$1.75	\$2.50	\$3.00	\$0.50	20.00%	71.43%
Call Waiting <sup>2</sup>	\$3.75	\$6.00	\$7.00	\$1.00	16.67%	86.67%
Call Waitng Options <sup>2</sup>	\$3.75	\$6.00	\$7.00	\$1.00	16.67%	86.67%
Signal Ring <sup>2</sup>	\$3.75	\$5.00	\$6.00	\$1.00	20.00%	60.00%
Disc Call Fwd NoAns <sup>2</sup>	\$1.50	\$2.50	\$3.00	\$0.50	20.00%	100.00%
Disc Call Fwd Busy <sup>2</sup>	\$1.50	\$2.50	\$3.00	\$0.50	20.00%	100.00%
Disc Call Waiting <sup>2</sup>	\$3.25	\$6.00	\$7.00	\$1.00	16.67%	115.38%

Disc Call Waiting Opt <sup>2</sup>	\$3.25	\$6.00	\$7.00	\$1.00	16.67%	115.38%
Disc Signal Ring <sup>2</sup>	\$3.25	\$5.00	\$6.00	\$1.00	20.00%	84.62%
Remote Call Fwd <sup>2</sup>	\$10.50	\$15.50	\$18.50	\$3.00	19.35%	76.19%

<sup>1</sup>The increases proposed with the present filing do not exceed 25 percent annually, and therefore comply with the provisions of United's Price Plan.

<sup>2</sup>The increases proposed with the present filing do not exceed the greater of \$.50 or 50 percent in the present year or 200 percent in the current Plan term, and therefore comply with the provisions of United's Price Plan.

For Bundled and Packaged services the Company provided evidence that the proposed rates are less than the sum of the stand-alone retail prices.

The Company states that customers were notified of the proposed rate changes.

*Grandfathered Services*

The services to be grandfathered with the present filing are summarized in the table below.

Type	Service
Special Exchange Services	Custom Calling Features
Special Exchange Services	Express Touch
Special Exchange Services	Solutions Packages

The grandfathered services, with no sunset date, will no longer be available to new customers but will continue to be available to current subscribers.

The Company states that customers were notified of the proposed rate changes.

Conclusion

This filing complies with applicable laws and the provisions of United's Price Plan. The filed tariff sheets should be allowed to become effective, and an acknowledgement letter should be sent.