

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: January 5, 2022

TO: File through John Crider and Bruce Hellebuyck

FROM: Joseph Bartholomew

SUBJECT: UNITED TELEPHONE COMPANY OF NORTHWEST dba CENTURYLINK: (Docket No. PL 190/Advice No. 21-009)
Grandfathers certain low-bandwidth private line services.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, United Telephone Company of Northwest dba CenturyLink (CenturyLink) proposes to grandfather certain low-bandwidth private line services (PLS) and makes the following changes to the Private Line Transport Services Price List No. 102:

Section	Revision	Sheet
17	1st	9
17	1st	11
17	1st	13
17	1st	15
17	1st	17
17	1st	18
17	2nd	20

Section	Revision	Sheet
17	1st	21
17	1st	22
17	1st	23
17	1st	24
17	1st	25
17	1st	26
17	1st	27

The filing was submitted on November 16, 2021, with a proposed effective date of November 17, 2021.

Applicable Law

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

On September 28, 2018, with Order No. 18-359 (Docket No. UM 1908), the Commission approved a Price Plan applicable to both CenturyLink and its affiliates, Qwest Corporation dba CenturyLink QC, CenturyTel of Oregon d/b/a CenturyLink, and CenturyTel of Eastern Oregon d/b/a CenturyLink, as allowed by ORS 759.255. Section 8a of CenturyLink's Price Plan requires price list changes to be filed with the Commission at least one day prior to the effective date of the change. Section 8.b of the Price Plan requires CenturyLink to provide customers with 30-day notice of changes to terms or conditions of service.

Pursuant to OAR 860-032-0020(1)(d), "grandfather" means "to discontinue or cease offering a service to new customers and to continue offering the service to existing

customers." OAR 860-036-0020(1)(k) defines "sunset date" as "the day a telecommunications provider will abandon a grandfathered service being provided to existing customers."

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 Staffs consideration of such filings, including review for compliance with any applicable Price Plan.

Analysis

This filing grandfathers certain low-bandwidth Private Line Services effective November 17, 2021. Newer technologies and services are available to customers in lieu of these technologically obsolete services. New orders and moves of existing services will be allowed to the extent permitted by existing term contracts. Existing terms will not be renewed upon expiration. Customers currently under a term commitment plan may retain their low-bandwidth services on a month-to-month basis upon expiration of their current term plan.

Compliance

This filing complies with all applicable laws, rules, and Commission orders. The filing proposes no sunset date for the grandfathered services, and CenturyLink states that the services will continue to be available to existing subscribers.

The filing was submitted at least one day prior to its effective date, and customers were notified 30 days prior to the effective date therefore this filing complies with the requirements of ORS 759.175 and Section 8aii of CenturyLink's Price Plan.

Conclusion

The filing should be allowed to go into effect, and an acknowledgment letter should be sent. No further action is necessary.