

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: April 6, 2022

TO: File through Marc Hellman and Bruce Hellebuyck

FROM: Joseph Bartholomew

SUBJECT: UNITED TELEPHONE COMPANY OF THE NORTHWEST dba CENTURYLINK: (Docket No. PL 193/Advice No. 22-001 supersedes Docket No. PL 182/Advice No. 21-007) introduces two Competitive Response Offers and Promotions, Simply Unlimited Phone for Residence \$5 Bill Credit for 12 months and Simply Unlimited Business NRC Waiver.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, United Telephone Company of the Northwest dba CenturyLink (CenturyLink) proposes a new competitive response offer and promotion available to existing residential and business customers and adds a page to OR PUC Price List No. 102. The following page will be revised:

Section 16, Page 18.2, 1st Revision

The filing was submitted on January 4, 2022, and went into effect on January 5, 2022.

Applicable Rule or 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. CenturyLink is also regulated under a Price Plan pursuant to ORS 759.255 and Order No. 18-359, issued September 28, 2018.

Section 8a(ii) of the Price Plan requires CenturyLink to file notice of all Price List changes with the Commission at least one day prior to the effective date of the change.

Section 9 of CenturyLink's Price Plan explains that CenturyLink may offer promotions for residential Primary Line Basic Service and other regulated services pursuant to ORS 759.182 and 759.267.

OAR 860-026-0025 governs a utility's ability to offer promotional concessions. Under Section 13 of the Price Plan, CenturyLink was granted a partial waiver of that rule to enable CenturyLink to run promotions for up to 9 months in any 12-month period, rather than the 180 days in any 12-month period specified in the rule.

Analysis

This filing creates a new promotion for existing residential and business customers. None of these changes affect the intent of the price list.

Beginning October 8, 2021, through July 4, 2022, existing residence customers may be eligible for a \$5 bill credit for 12 months when they contact the Company to disconnect service and agree to retain service with the Company. To be eligible, the customer must agree to subscribe to the Company's Simply Unlimited Phone bundle for a minimum of 12 months. The initial bill credit will be reflected on the customer's first or second invoice following the customer's acceptance of this offer and will continue for 11 consecutive months thereafter. If a customer discontinues Simply Unlimited Phone prior to the end of the 12-month period, no additional credits will be applied. In no event will the application of this discount be used in conjunction with any other credits to take the customer's billed amount below zero.

Beginning October 8, 2021, through July 4, 2022, Business customers may be eligible for a waiver in all applicable nonrecurring charges that otherwise apply when a new access line or key trunk is installed. To be eligible, customers must establish a new account or order a new access line. Nonrecurring charges otherwise applicable will be waived when the qualifying customer subscribes to the company's Simply Unlimited Business packaged service which includes a CenturyLink Communications, LLC unlimited long-distance plan..

This filing supersedes a previous filing by CenturyLink under Docket No. PL 182. After analysis of Docket No. PL 182, Staff found errors in regards to the allowable length of a promotion under section 13 of the Price Plan. Per section 8aii of the Price Plan, revisions to the OR Price List 101 go into effect one day after submittal, these errors were found by Staff after the effective date of October 8, 2021.

This filing was submitted more than one day prior to its effective date.

Conclusion

This filing complies with all applicable laws, rules, Commission orders, and CenturyLink's Price Plan. The filing has already gone into effect, and an acknowledgement letter should be sent. No further action is necessary.