ENTERED

APR 1 3 2015

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UX 28

In the Matter of

QWEST CORPORATION,

Petition to Exempt from Regulation Qwest's IntraLATA Toll Service, Operator Service Charges, and 800 Service Line Option. ORDER

DISPOSITION: STIPULATION ADOPTED

I. BACKGROUND

On August 20, 2014, Qwest Corporation dba CenturyLink QC (CenturyLink QC) filed a petition to modify certain conditions we imposed when granting its earlier request to exempt intraLATA toll (and other services) from regulation. Specifically, CenturyLink QC requests a waiver of Condition 3 and Condition 4 of the stipulation approved in Order No. 03-609. The two conditions require CenturyLink QC to be the default intraLATA toll service provider (DXC) of specified intraLATA toll services in all Oregon exchanges where a primary toll carrier (PTC) is not designated. Because United Telephone Company of the Northwest (United) and Frontier Communications Northwest (Frontier) are the only PTCs in Oregon, the conditions require CenturyLink QC to be the DXC in all Oregon Telephone Exchanges not served by United and Frontier.

1

Following settlement discussions, CenturyLink QC, Commission Staff, the Citizens' Utility Board of Oregon (CUB), the Oregon Telephone Association (OTA), AT&T, and Frontier (the stipulating parties) filed a stipulation intended to resolve all issues. Supporting joint testimony was filed by CenturyLink QC, Commission Staff, CUB and OTA (the joint parties).² No party objected to the stipulation.

¹A complete list of the Oregon Rural ILEC Exchanges affected by the current petition is provided in Attachment 1 to the stipulation.

² Although AT&T and Frontier joined the stipulation and do not object to its resolution of any issue, they did not take a position on every issue and did not sponsor the joint testimony.

II. THE STIPULATION

Primary provisions of the stipulation include:

A. Limited Waiver of Conditions

The stipulating parties agree that CenturyLink QC may be relieved of its status of default DXC to customers served by the Oregon rural incumbent local exchange companies (ILECs) specified in Attachment 1 to the stipulation. The stipulation removes conditions 3 and 4 from the list of conditions set forth in Order No. 03-609. The stipulation specifies that removal of Condition 3 is limited, however, to the pre-subscribed intraLATA toll customer-carrier relationship for customers located within specified Oregon ILEC exchanges, and will not affect any facilities or any other dialing including 9-1-1 or other abbreviated dialing, EAS, or causal dialed calls. The stipulation further indicates that implementation will only involve changing the intraLATA presubscribed interexchange carrier (LPIC) code 0000 associated with end user accounts, and does not involve blocking.

The stipulating parties also clarify that CenturyLink QC did not ask to abandon any service under OAR 860-032-0020(9). The joint parties explain that the removal of Conditions 3 and 4 entails a change to a Commission order, therefore, and does not constitute abandonment of service.

The previous stipulation to Order No. 03-609 provides that Qwest will remain the DXC and maintain its current toll origination points, unless authorized by separate Commission order to abandon a toll origination point, or to cease being the DXC for a particular toll origination point. The joint parties explain that the effect of the proposed stipulation will be to remove CenturyLink QC as a presubscribed interexchange carrier (PIC) alternative in the areas where CenturyLink QC seeks to remove the toll origination point(s).

B. Notice to Customers

The stipulation provides that the affected Oregon rural ILECs will provide at least 60 days advance notice to customers currently using CenturyLink QC for intraLATA toll service. The stipulation mandates that the Oregon rural ILECs will send customer notices out no later than thirty days following the entry date of this order.

The stipulation indicates that the Oregon rural ILECs will also endeavor during the 60-day notification period to contemporaneously make LPIC changes at the time that customers notify the company of their election. For customers not electing a new carrier during the notification period, the stipulation provides that the Oregon rural ILECs will have an additional ten days to make LPIC changes, but that such changes will be done before the deadline date.

C. LPIC Change

The stipulation provides that customers not electing a new carrier during the notification period will be assigned to their interLATA long distance providers. The stipulation further provides that customers not having an interLATA long distance provider will be assigned the classification of "no PIC."

D. LPIC Change Charge Waived

The stipulation indicates that customers will not be charged for making a LPIC change during the election period. It also provides that customers assigned either to an interLATA provider or to the "no PIC" classification will not incur a LPIC change charge, and may additionally make one subsequent change without charge.

E. LPIC Change, Call Handling, and Noticing Reimbursement

The stipulation specifies that CenturyLink QC will provide \$7.50 to each Oregon rural ILEC for each CenturyLink QC intraLATA customer.

F. PIC Freeze

The stipulation explains that if a customer has a PIC freeze, it will be removed in order to make a LPIC change, and that the Oregon rural ILEC will reinstate the PIC freeze after making the LPIC change.

G. Toll Billing

As toll billing on end user bills might occur for two billing cycles after LPIC changes are made, the stipulation provides that ILECs will inform affected customers that CenturyLink QC toll charges may continue to show up on their bills for up to two billing cycles. The stipulation also specifies that the billing and collection arrangement between entities will remain in place to facilitate the reimbursement for toll up to 70 days plus two full billing cycles (assuming billing cycles are every month) after entry of this order.

H. Other Items

The stipulation also asks the Commission to:

- Authorize the removal of CenturyLink QC's toll origination points specified in Condition No. 3 of the Stipulation incorporated in Order No. 03-609.
- b. Authorize a waiver of Condition No. 4 as it relates to the toll origination points removed by the authorization under paragraph 11a.

- c. Authorize certain Oregon rural ILECs to: 1) remove CenturyLink QC from customer facing information about providers of intraLATA toll in their exchanges and, 2) remove CenturyLink QC as an intraLATA PIC choice in their switches.
- d. Affirm that all Conditions of Order No. 03-609, not waived remain in full force and effect.

III. SUPPORT FOR STIPULATION

The joint parties ask us to issue an order approving the petition and the stipulation. They represent that "CenturyLink QC's request is a natural progression from prior Commission orders." They explain that the Commission deregulated Qwest's intraLATA toll in Order No. 03-609 with conditions that provided consumer protections and safeguards. For example, one condition required Qwest to notify customers that the Commission deregulated intraLATA toll. Another condition compelled Qwest to remain the designated carrier (carrier of last resort), while another mandated that Qwest maintain its current toll origination points unless otherwise authorized. The stipulating parties assert that this condition suggests that the Commission anticipated that a condition would be removed, as Qwest asks the Commission to do now.

The joint parties agree that customers will be unharmed by granting CenturyLink QC's petition because there are adequate alternatives to CenturyLink QC's intraLATA service. They represent that this assertion is based on information from three sources: (1) OTA provided confidential information (Exhibit D to the stipulation) showing the number of alternative providers likely available in the exchanges of rural ILECs; (2) CenturyLink QC provided confidential information (Exhibit E to the stipulation) regarding alternative providers in the exchanges of CenturyTel of Oregon and CenturyTel of Eastern Oregon; and (3) Frontier provided similar information relating to alternative intraLATA toll providers in the Citizens exchanges (Exhibit F to the stipulation). The Joint Parties also observe that confidential information presented by CenturyLink QC (Exhibit C to the stipulation) shows that consumers have decreased dependence on CenturyLink QC as the DXC in rural ILEC exchanges.

The joint parties also argue that the stipulation will not harm customers because it mandates adequate notice requirements, and specifies options for customers to obtain information related to their choices.

Finally, the joint parties argue that the stipulation appropriately addresses the financial loss currently faced by CenturyLink QC. CenturyLink QC's petition cites "declining revenue and lack of profitability" to justify its request to be relieved of the obligation to serve as the default provider of intraLATA toll service to customers in exchanges served by the Oregon rural ILECs. The joint parties explain the situation needs to be addressed:

³ Joint Testimony to Adopt Stipulation at 6.

⁴ Petition at 2.

Under the current arrangement, the rural ILECs bill the customers for the intraLATA toll service provided by CenturyLink QC and remit the revenues to CenturyLink QC (i.e., because CenturyLink QC has not updated its billing software, the rural ILECs have the billing relationship with the customer, not CenturyLink QC). In addition, over time, the costs of billing and collecting (B&C) services from the rural ILECs have increased on a per message basis. This results in some rural ILECs charging CenturyLink QC more for the billing services than CenturyLink QC receives in retail revenues for providing DXC services. As a result, CenturyLink QC is actually *losing* money when providing intraLATA toll services to its customers as the DXC.⁵

IV. DISCUSSION

We find good cause to grant the petition of CenturyLink QC to waive the conditions adopted in Order No. 03-609 that require CenturyLink QC to be the DXC for certain intraLATA toll services in all Oregon exchanges where a primary toll carrier (PTC) is not designated. We also find that the stipulation's resolution of the issues related to the petition to be reasonable, and we adopt it. We authorized the conditions set forth in Order No. 03-609 in order to mitigate concerns that existed then about exempting Qwest's intraLATA toll services from full regulation. We are persuaded that such concerns are no longer significant, and that it is reasonable to modify or remove conditions when underlying concerns are alleviated. We conclude that the stipulation removes the conditions based on sufficient evidence that customers will not be harmed by such action.

V. ORDER

IT IS ORDERED that:

1. The stipulation between Qwest Corporation, dba, CenturyLink QC, the Citizens' Utility Board of Oregon, the Oregon Telephone Association, and the Staff of the Public Utility Commission of Oregon, attached hereto as Appendix A, is adopted.

⁵ Joint Testimony to Adopt Stipulation at 11.

2. Order No. 03-609 is revised to modify conditions adopted within it consistent with the stipulation we adopt by this order.

Made, entered, and effective _____ APR 1 3 2015

Susan K. Ackerman Chair

John Savage Commissioner

Stephen M. Bloom Commissioner

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.

15 112

DOCKET NO. UX 28 STIPULATION

Exhibit A

The parties to the Stipulation are CenturyLink QC, Public Utility Commission of Oregon Staff (Staff), Citizens' Utility Board of Oregon (CUB), and the Oregon Telephone Association (OTA), AT&T, and Frontier (herein "Joint Parties.") AT&T and Frontier only took position on a limited number of issues and are not sponsors of this testimony. However, to the extent AT&T and Frontier did not take a position on an issue, they do not object to its inclusion in the Stipulation.

- 1. <u>General.</u> CenturyLink QC is seeking a waiver of Conditions 3 and 4 of Order No. 03-609 and only as they pertain to CenturyLink QC's provision of intraLATA toll services to customers served in the exchanges of the Oregon rural ILECs listed in Attachment 1. All other conditions in Order No. 03-609 will remain in full force and effect.
- 2. <u>Limited Waiver</u>. The Parties agree that the waiver of Conditions 3 and 4 of Order No. 03-609 is limited to the pre-subscribed intraLATA toll customer-carrier relationship relating to customers located within specified Oregon ILEC exchanges. It will not affect any facilities or affect any other dialing including 9-1-1 or other abbreviated dialing, EAS, or casual dialed calls. Implementation only involves changing the intraLATA presubscribed interexchange carrier (LPIC) code 0000 associated with end user accounts and does not involve blocking.
- 3. Notice to customers. The affected Oregon rural ILECs listed in Attachment 1 will provide at least sixty days advance notice to customers who currently use CenturyLink QC for intraLATA toll service. The Oregon rural ILECs will send customer notices out no later than thirty days following the Commission's entry of an order approving this Stipulation. The Oregon rural ILECs will endeavor to make LPIC changes at the time that customers notify the company of their election, during the sixty (60) day notification period. For customers that do not make an election of a new carrier during the sixty day notification period and will be moved to their interLATA long distance provider or "no-PIC" (as explained in Stipulation Term No. 4 below), the Oregon rural LECs will have an additional ten days to make LPIC changes. For illustrative purposes, use of the sixty day notification period and additional ten day period would provide at least sixty days for the customer to act on the notice. Customers who act on the notice and contact the company during the sixty day notification period will experience a LPIC change in the normal course of business (i.e., likely that day). Customers who have not notified the company will experience their LPIC change on or before the noticed LPIC change deadline date. See Attachment 2 for a diagram showing the notification timeline.

The Oregon rural ILECs will provide the notice as depicted in Attachment 3 to this Stipulation. As reflected in Attachment 3, the following will be included in the notice:

- (1) The name of the appropriate Oregon rural ILEC
- (2) A toll-free number to call in the event the customer has questions
- (3) Map of Oregon showing a few cities in each LATA

DOCKET NO. UX 28 STIPULATION

(4) A reference to CUB Connects and a list of alternative providers, if the rural ILEC chooses to include a list of alternative providers in its customer notice.

The Commission will post the generic customer notice to its website with references to current customer service contacts in affected exchanges. The rural ILECs will each have an LPIC list available to respond to customer questions regarding alternative providers which result from calls to the toll-free number listed in the notice. The list should represent a good faith effort to correctly list currently available intralatalong distance providers serving the rural ILECs territory and provide the most rescent contact information available to the ILEC. Because the market for IXC service is competitive and entry and exit are relatively easy, we recognize that lists may not be completely accurate at any given point in time. An interexchange carrier that changes its contact information for customer contacts is expected to notify the ILECs of that change so that the new information can be incorporated into each ILEC's list of available interexchange carriers. Rural ILECs have the option of including that list in their notice. The rural ILEC is not required to include on that list over-the-top or VoIP providers that are not certificated by the Oregon Commission or providers that do not have a CIC code. ILECs will not promote the services of any specific IXC over the services of any other IXC if asked by its customers for assistance choosing a new IXC.

- 4. <u>LPIC change</u>. The Parties agree that end users who do not respond to the customer notice, and who do not contact the Oregon rural ILEC to request a LPIC change, will be assigned to their interLATA long distance provider for intraLATA toll service. If a customer does not have an interLATA long distance provider, the customer will be assigned "no PIC."
- 5. LPIC charge waived. The Parties agree that the customers that respond with a LPIC change will not be charged for this change. In addition, any non-responding customer that is assigned to their interLATA provider or to "no PIC", will not incur an initial LPIC change charge and may within seventy-five days, change its intraLATA toll provider one time without incurring LPIC change or other non-recurring charges. The seventy-five day calculation is explained in Attachment 2.
- LPIC change, call handling and noticing reimbursement: The Parties agree that CenturyLink QC will provide \$7.50 to each Oregon rural ILEC for each CenturyLink QC IntraLATA customer as identified in Attachment 4.
- 7. <u>PIC freeze.</u> If a customer has a PIC freeze, it will be removed in order to make a LPIC change, and then the Oregon rural ILEC will re-instate the PIC freeze after making the LPIC change.

DOCKET NO. UX 28 STIPULATION

Exhibit A

- 8. Commission has authority to grant the waiver. The Parties agree that the waiver of conditions 3 and 4 is not an abandonment of service covered in Oregon Administrative Rules, but rather is a change to a prior Commission Order under Oregon Revised Statutes. Supporting this understanding, Condition 3 of Commission Order No. 03-609 contemplates that a change to originating toll points can be made with Commission approval, which has the effect of granting CenturyLink QC's waiver request. Thus, the effect of the waiver will be to remove CenturyLink QC as an LPIC alternative in the areas where CenturyLink QC seeks to remove the toll origination point.
- 9. There are sufficient alternative providers. The Parties agree that there are sufficient alternative providers in the Oregon rural ILEC territories from which customers may choose.
- 10. Toll billing. Toll billing is in arrears and depending on billing cut offs and other factors, toll billing on end user bills might occur for two billing cycles after LPIC changes are made. ILECs will inform affected customers that CenturyLink toll may continue to show up on their bills for up to two billing cycles. The billing and collecting arrangements between entities will remain in place to facilitate the reimbursement for toll up to seventy days plus two full billing cycles (assuming billing cycles are every month) after a Commission Order is entered.
- 11. Other items. The Parties agree that the Commission should:
 - a. Authorize the removal of CenturyLink QC's toll origination points specified in Condition No. 3 of the Stipulation incorporated in Order No. 03-609.1
 - b. Authorize a waiver of Condition No. 4 as it relates to the toll origination points removed by the authorization under paragraph 11 a.
 - c. Authorize the Oregon rural ILECs specified in Attachment 1 to: 1) remove CenturyLink QC from customer facing information about providers of intraLATA toll in their exchanges and, 2) remove CenturyLink QC as an intraLATA PIC choice in their switches.
 - d. Affirm that all Conditions of Order No. 03-609, not waived remain in full force and effect.

GENERAL PROVISIONS

12. The Parties agree that this Stipulation represents a compromise in the positions of the Parties. Without the written consent of all of the Parties, evidence of conduct or

¹ (See Appendix A, pg. 4 of 6, Order No. 03-609).

DOCKET NO. UX 28 STIPULATION

Exhibit A

statements, including but not limited to term sheets or other documents created solely for use in settlement conferences in this docket, are confidential and not admissible in the instant or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.

- 13. The Parties have negotiated this Stipulation as an integrated document. The Parties, after consultation, may seek to obtain Commission approval of this Stipulation prior to evidentiary hearings. If the Commission rejects all or any material part of this Stipulation, or adds any material condition to any final order that is not consistent with this Stipulation, each Party reserves its right: (i) to withdraw from the Stipulation, upon written notice to the Commission and the other Parties; (ii) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Stipulation; and (iii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or, pursuant to ORS 756.610, to appeal the Commission's final order if such final order does not approve the Stipulation in full.
- 14. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Parties agree to support this Stipulation throughout this proceeding and in any appeal, and provide witnesses to support this Stipulation (if specifically required by the Commission), and recommend that the Commission issue an order adopting the settlements contained herein. By entering into this Stipulation, no Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.
- 15. This Stipulation may be signed in any number of counterparts, each of which will be an original for all purposes, but all of which taken together will constitute one and the same agreement. Faxed or emailed copies of signature pages will be treated as original signature pages.
- 16. The Parties understand that this Stipulation is not binding upon the Commission unless and until it is approved by the Commission.
- 17. This Stipulation does not preclude a Party from explaining, as a factual matter, what the Parties agreed to in this Stipulation.
- 18. The Parties agree that this Stipulation represents the entire agreement of the Parties on this subject and that it supersedes any and all prior oral or written understanding, agreements or representation related to this Stipulation, if any, and no such prior

ORDER NO. 15 112

DOCKET NO. UX 28 STIPULATION

Exhibit A

understanding, agreement or representations shall be relied upon by any Party.

19. The Parties shall cooperate in submitting this Stipulation promptly to the Commission for acceptance, and cooperate in supporting this Stipulation throughout the Commission's consideration of the Stipulation.

This Stipulation is entered into by each Party as follows:

Qwest Corporation d/b/a CenturyLink QC
By: Ron Trullinger
Ron Trullinger
Oregon Telecommunications Association
By:
Richard A. Finnigan
Citizens' Utility Board of Oregon
By:
Sommer Templet
Public Utility Commission of Oregon Staff
By:
Jason Jones

15 11 12

DOCKET NO. UX 28 STIPULATION

Exhibit A

understanding, agreement or representations shall be relied upon by any Party.

19. The Parties shall cooperate in submitting this Stipulation promptly to the Commission for acceptance, and cooperate in supporting this Stipulation throughout the Commission's consideration of the Stipulation.

This Stipulation is entered into by each Party as follows:

By:
Ron Trullinger
Oregon Telecommunications Association By: Richard A. Finnigan
Techara 71. I Hangari /
Citizens' Utility Board of Oregon
By:
Sommer Templet
Public Utility Commission of Oregon Staff
By:
Jason Jones

Qwest Corporation d/b/a CenturyLink QC

ORDER NO.

15 1112

DOCKET NO. UX 28 STIPULATION

Exhibit A

understanding, agreement or representations shall be relied upon by any Party.

19. The Parties shall cooperate in submitting this Stipulation promptly to the Commission for acceptance, and cooperate in supporting this Stipulation throughout the Commission's consideration of the Stipulation.

This Stipulation is entered into by each Party as follows:

Qwest Corporation d/b/a CenturyLink QC
By:
Ron Trullinger
Oregon Telecommunications Association
Ву:
Richard A. Finnigan
Citizens' Utility Board of Oregon
By:
Sommer Templet
Public Utility Commission of Oregon Staff
By:
ason Iones

ORDER NO. 15 112

DOCKET NO. UX 28 STIPULATION

Exhibit A

understanding, agreement or representations shall be relied upon by any Party.

19. The Parties shall cooperate in submitting this Stipulation promptly to the Commission for acceptance, and cooperate in supporting this Stipulation throughout the Commission's consideration of the Stipulation.

This Stipulation is entered into by each Party as follows:

Qwest Corporation d/b/a CenturyLink QC
Ву:
Ron Trullinger
Oregon Telecommunications Association
Ву:
Richard A. Firmigan
Citizens' Utility Board of Oregon
Ву:
Sommer Templet
Public Utility Commission of Oregon Staff
Py:
Jason Johes

15 112

ATTACHMENT 1

Asotin Telephone Company

Beaver Creek Cooperative Tel. Co.

Canby Telephone Association

Cascade Utilities, Inc.

Century Tel of Eastern Oregon, Inc.

CenturyTel of Oregon, Inc.

Clear Creek Mutual Telephone Co.

Colton Telephone Company

Citizens Telecommunications Company of Oregon

Eagle Telephone System, Inc.

Gervais Telephone Company

Helix Telephone Company

Home Telephone Company

Humboldt Telephone Company

Molalla Telephone Company

Monitor Cooperative Telephone Company

Monroe Telephone Company

Mt. Angel Telephone Company

Nehalem Telecommunications, Inc.

North-State Telephone Company

Oregon Telephone Corporation

Oregon-Idaho Utilities, Inc.

Peoples Telephone Company

Pine Telephone System, Inc.

Pioneer Telephone Cooperative

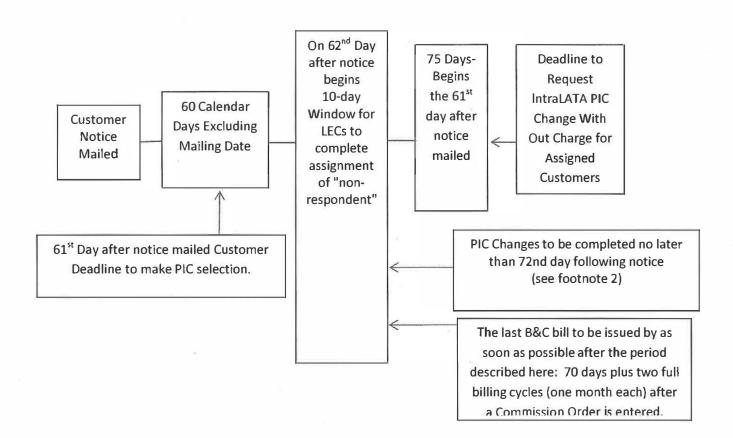
Roome Telecommunications, Inc.

Scio Mutual Telephone Association

St. Paul Cooperative Tel. Assoc.

Stayton Cooperative Telephone Company

Trans-Cascade Telephone Company



Rural LECs to send Customer Notice by 30th day after Commission Order approving Stipulation is entered.

CenturyLink QC to file FCC application one week after customer notices sent Deadline for customers to respond to RLECs with their LPIC choice - 60 days after notice mailed¹

ILECs make LPIC change to customers that did not respond by 72nd day after Notice mailed.²

Retail customers that did not respond to the ILEC and had their LPIC changed by the ILEC have up to 136 days after notice is mailed to make one choice of LPIC change without incurring an LPIC change charge.

The billing and collecting arrangements between entities will remain in place to facilitate the reimbursement for toll up to seventy days plus two full billing cycles (assuming billing cycles are every month) after a Commission Order is entered.

¹ 60 days notice is necessary in order to obtain FCC approval as well as meet the OR PUC notice requirements.

² Deviations in the 10 day processing period deadline will be considered by Staff and CenturyLink QC on a case by case basis to allow for processing large volumes of PIC changes for customers that don't notify the company during the 60 day customer notice period.

Oregon ILEC's Letterhead

XXXXXXX, 2015

<Bill Name Line 1>
<Bill Address Line 1>
<Bill City>, < Bill State> < Bill Zip>

Re: CenturyLink's Notice of Intent to Discontinue Offering Local Long Distance Service

Dear Customer:

This letter is being sent to you because we have been informed that your current local long distance carrier, Qwest Corporation, d/b/a CenturyLink QC, will be withdrawing as a local long distance provider in the state of Oregon, effective XXXX, 2015, subject to approval by the Federal Communications Commission. The Oregon Public Utility Commission (OPUC) has approved this action by CenturyLink QC. Therefore, you must select another long distance provider by XXXXX, 2015. Once you have selected a new local long distance provider, please contact us at ______Telephone #_____ with your choice. There will be no charge to transfer your service.

[Insert appropriate paragraph for your LATA - see below]

If you want information about possible replacement carriers, such information is available and at the CUB Connects website http://cubconnects.org/ or at CUB Connects telephone number ______. CUB Connects is a free, unbiased resource that helps consumers to navigate the competitive marketplace for telecommunications services available in your local community. You may also get information regarding replacement carriers by calling us toll-free at XXXXX

If we do not receive your selection of a new local long distance provider by March 20, 2015, we are required to assign the other long distance provider on your account (the one used for calling XXXXX or out-of-state) as your local long distance provider. If you do not have another long distance provider, you will not be assigned to another provider and you will not be able to make local long distance calls until you select a new local long distance provider. Therefore, if you currently do not have another long distance provider and you want to be able to make local long distance calls after XXX, you must select a local long distance provider and notify us at __Telephone #_____ with your choice.

If you have a preferred carrier freeze (PIC freeze) on your account, it will be removed for this one change and then will be reinstated.

¹ A PIC freeze is a request that would have been made by you previously, to ensure that your long distance provider was never changed without your authorization.

This change in local long distance providers will not affect any other services you receive from us. If you have any questions about this letter or the selection process, please contact us at ______.

Sincerely, Telephone Company

The following statement is required by the Federal Communications Commission (FCC):

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Sec. 63.71 Application of Qwest Corporation d/b/a CenturyLink QC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Attachments: Map showing Oregon Local Long Distance Calling Areas

The following information should not be included in the notice unless it is inserted in the appropriate spot noted above.

Alternate paragraph for the Portland LATA:

CenturyLink is currently your provider of local long distance service, which refers to long distance calls within the Portland local long distance calling area. Please see the attached map. For instance, calls from Portland to Bend are local long distance. Other calls, including calls to Eugene, or out-of-state calls, are carried by your other long distance toll carrier, or you may have selected to not have a carrier for those types of long distance calls.

Alternate paragraph for the Eugene LATA:

Local long distance service refers to long distance calls within the Eugene local long distance calling area. Please see the attached map. For instance, calls from Eugene to Ashland are local long distance. Other calls, including calls to Portland, or out-of-state calls, are carried by another long distance toll carrier (which may be an affiliate of

Century Link QC), or you may have selected to not have a carrier for those types of long distance calls.

Alternate paragraph for the Boise LATA (OR-ID Utilities is in that LATA):

CenturyLink is currently your provider of local long distance service, which refers to long distance calls within the southeast Oregon local long distance calling area. Please see the attached map. For instance, calls from Jordan Valley to Vale, or to Boise, Idaho are local long distance. Other calls, including calls to Portland, or calls to states other than southern Idaho, are carried by your other long distance toll carrier, or you may have selected to not have a carrier for those types of long distance calls.

RLEC Option – RLECs may choose to include a list of alternative carriers that satisfies the requirements of equal access rules and procedures. The list should represent a good faith effort to correctly list currently available intraLata long distance providers serving the RLECs territory and provide correct contact information. In the body of the notice the RLEC may add a reference to the alternate provider list. The RLEC is not required to list over-the-top or VoIP providers that are not certificated by the Oregon Commission or providers that do not have a CIC code. If the company decides to provide a list they still need to provide their telephone number in the customer notice.

∞
2
2
4
~
₩

\$7.50

CIC 0000	0000 Customers
Company	IntraLATA Qwest PIC* Customers
Asotin (TDS)	0
Beaver Creek	259
Canby	0
Cascade**	3,336
Citizens	1,742
Clear Creek	143
Colton	152
Eagle	153
Gervais	80
Helix	115
Home (TDS)	5
Humboldt	0
Molalla	466
Monitor	225
Monroe	100
Mt. Angel	454
Nehalem	580
North-State	26
Oregon Tel. Corp.	99
Oregon-Idaho	240
People's	105
Pine	213
Pioneer Coop	724
Roome	132
Scio	270
St. Paul	12
Stayton	371
TOTAL	9,897

*CIC 0000
**Includes Trans-Cascades