

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2399

In the Matter of

LUMEN TECHNOLOGIES, INC.,

Service Quality Performance Plan.

ORDER

DISPOSITION: STAFF’S RECOMMENDATION ADOPTED

This order memorializes our decision, made and effective at our September 16, 2025 Regular Public Meeting, to adopt Staff’s recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A. We invite the Oregon Citizens’ Utility Board to work with Staff to address the additional suggestions raised at the public meeting, with Staff to present at a future public meeting any recommendations to amend the plan as appropriate.

Made, entered, and effective Sep 18 2025.



Letha Tawney
Chair



Les Perkins
Commissioner



Karin Power
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 Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. RA4

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 16, 2025**

REGULAR _____ CONSENT X EFFECTIVE DATE _____ Upon Commission Approval

DATE: August 25, 2025

TO: Public Utility Commission

FROM: Joseph Bartholomew

THROUGH: Bryan Conway and Russell Beitzel **SIGNED**

SUBJECT: LUMEN TECHNOLOGIES:
(Docket No. UM 2399)
Service Quality Performance Plan.

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Lumen Technologies Inc. (Lumen or Company) performance plan.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should approve Lumen Technologies', dba Century Link,¹ performance plan, laying out how the Company will improve its performance to meet the minimum service quality metrics within six months.

Applicable Rule or Law

The Commission establishes minimum service quality standards to ensure safe and adequate services for all telecommunications carriers pursuant to Oregon Revised Statute (ORS) 759.450. Under Section (5) of this statute, the Commission is required to direct a telecommunications carrier, utility, or competitive provider that is

¹ Lumen Technologies, Inc. is the parent of operating companies Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of Oregon, and CenturyTel of Eastern Oregon.

not meeting the minimum service quality standards to submit a plan for improving performance to meet the standards. The Commission is further required to review and approve or disapprove the plan.

Oregon Administrative Rule (OAR) 860-023-0055 provides the statutorily required service quality standards for large telecommunications utilities and mirrors much of ORS 759.450. Repair Clearing Time per OAR 860-023-0055(6) requires 90 percent of all trouble reports to be cleared within 48 hours of report for each repair center.

On June 11, 2025, the Commission required Lumen by Order No. 25-216 to submit a service quality performance plan within 45 days to meet the minimum service quality standards for 48-hour repair clearing time.

Analysis

Background

Lumen timely filed its Service Quality Performance Plan ("Performance Plan") on July 25, 2025.

Previously, two other performance plans have been required. On August 1, 2001, under Order No. 01-689 Lumen was required to file a plan to improve its business office access performance. This resulted from a MOU between Staff and Qwest on July 24, 2001, and approval of Qwest's Performance Plan. Again on May 16, 2017, Lumen was required to submit a Performance Plan to improve retail service quality under Order No. 17-175.

In its performance plan the Company requests that the Commission engage in a review of whether repair clearing standards are "appropriate." Staff does not respond to this request as it is not germane to the matter before the Commission, which is whether to approve or disapprove the Performance Plan, given the current standards.

The Required Commission Performance Plan Review

Staff finds that Lumen has submitted a Performance Plan that may result in remedying the service quality standard deficiencies. The Company provides enough information to indicate that it plans to take steps and has the potential to return its service quality metric results to meeting Commission established standards.

While the Performance Plan is intended to remedy compliance with 48-hour repair clearing times; Staff will continue to monitor all other metrics during the Performance Plan review period and take any necessary action to remedy deficiencies.

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Performance Plan Action Items

The Company has submitted a 7-step approach with the intention of improving its 48-hour repair time. The steps are as follows:

1. Identify & Record Incidents – Strengthen detection of theft, vandalism, and force majeure events for quicker response.
2. Rural Standby & Escalations – Deploy on-call technicians and escalate late-day tickets in a remote area to speed fixes.
3. Large-Market Staffing Boost – Retain and train additional technicians in larger metropolitan areas.
4. Six-Day Service Coverage – Add Saturday shifts in key markets, ensuring continuous service through the weekend.
5. Expand Overtime – Allow voluntary overtime beyond 55 hours/week and introduce Sunday repair crews.
6. Air-Line V1600 Deployment – Use LTE-based Air-line adapters to restore phone service quickly without waiting on cable repairs.
7. Repair over Installation – Prioritize fixing outages (POTS repairs) over new line installations.

Performance Plan Review Period Considerations

The Performance Plan includes steps to meet the Commission's minimum service quality standards for 48-hour repair clearing times. The success or failure of the plan will be evaluated by Commission Staff with compliance as the goal, consistent with ORS 759.450(5) and Commission Order No. 25-216.

At the outset, Staff wishes to flag that the time frame for measuring the results of the Company's service quality performance plan does not align with the period in which the plan would be implemented, due to reporting lag. All companies are allowed to report monthly service quality results up to forty-five days after the end of each month. For example, April service quality data is due by June 15. As a result of the data reporting delay, the statutorily required six-month performance plan time frame for the Company to remediate its service quality may need to be defined or otherwise set by the Commission to allow for the normal course of reporting to reflect the success or failure of the Company's performance plan.

For ease of administration, Staff proposes beginning the six-month performance plan review period in the next full month after the Commission approves the Performance Plan and allowing the Company up to forty-five days to report its results for the sixth month of the Performance Plan review period. If successfully implemented, the Company's Performance Plan should allow for the Company's reported results for March 2026 to be consistent with the relevant service quality standards. This

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provides a standard timeframe for measuring whether or not the Company has met the goals of its Performance Plan. Staff anticipates a review period of October 2025 – March 2026, with a Staff targeting the end of June 2026 for providing results to the Commission for review.

Staff plans to continue to meet with Lumen representatives regularly and will obtain information on the Company's progress toward meeting the Performance Plan goals. If the Commission desired additional information in the interim, it could include in its order a requirement for additional reporting pursuant to OAR 860-023-0055(3), "The Commission may require a large telecommunications utility to submit additional reports on any item covered by this rule."

Conclusion

Staff concludes that Lumen has submitted a plan that provides a plausible path to reach compliance with the minimum service quality standard as outlined in OAR 860-023-0055.

Staff further concludes that it would be beneficial for the Commission to establish an objective measurement of Company progress by setting the beginning and ending month of the six-month performance plan review period, as well as the due date for final reporting.

PROPOSED COMMISSION MOTION:

Approve Lumen's service quality performance plan and set the performance plan review period to begin October 1, 2025, and end March 31, 2026. The Company has until May 15, 2026, to report its results for March 2026.

CA10 – UM 2399 Lumen Service Quality Performance Plan Submission