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Alexander W. Moore
Associate General Counsel

May 22, 2020

Judith C. Whitney, Clerk
Vermont Public Utilities Commission
112 State Street, 4th Floor
Montpelier, VT 05620

Re: Docket No. 20-0703-PET: Vermont Legal Aid Request for Moratorium on Utility and Telecommunications Shut-offs During State of Emergency

Dear Ms. Whitney:

Please find enclosed for filing in the above docket the Comments of Verizon. Thank you for your attention to this matter.

Respectfully submitted,

Alexander Moore CB

Alexander W. Moore

Enclosure

This document has been filed electronically via ePUC.

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Vermont Legal Aid request for Moratorium On Utility and Telecommunications Shut-offs During State of Emergency	)	Docket No. 20-0703-PET

COMMENTS OF VERIZON

MCI Communications Services, Inc., d/b/a Verizon Business Services, and MCI Metro Access Transmission Services, Inc. d/b/a Verizon Access Services (collectively "Verizon") submit these comments in response to the Order Requesting Comments on Another Extension of the Temporary Moratorium on Involuntary Utility Service Disconnections entered on May 15, 2020, and in response to the comments filed by the Department of Public Service on May 8, 2020.

In Verizon's view, an extension of the temporary moratorium to June 30 is more appropriate and would make for better policy than a lengthy extension to July 31. A one-month extension would continue to provide support for customers who need it while affording the Commission and service providers greater flexibility to manage that support as the economy reopens, jobs are restored and paychecks resume. Governor Scott has extended the state of emergency only to June 15 while also allowing certain sectors of the economy to reopen under enhanced safety rules, including some construction and manufacturing activities, lodging, outdoor activities and retail.[1] Extending the moratorium to June 30 would therefore better align with the reopening of economic activity in Vermont. In addition, Verizon and many other telecommunications providers have signed onto the FCC's "Keep Americans Connected" pledge, voluntarily committing to waive late fees and to not terminate service for those consumers and small businesses who are unable to pay their bills due to disruptions caused by the coronavirus. Verizon was the first service provider to extend its commitment to June 30, but many other providers and the FCC itself have followed suit, so that extending the moratorium to that date would also align with the expectations and planning of the industry and the federal regulator.

Verizon agrees with the Department that additional support of some residential and small business customers will be necessary when the moratorium expires, whether in June or July. The Department's suggestion that,"[c]ustomers whose arrearages built during the moratorium could be afforded up to twelve months to pay back their debt," PSD Comments at 2, however, goes too far and is too rigid as companies and consumers alike work to restore the economy and customers' paychecks.

As the Department noted, *id.* at 1, most service providers in Vermont voluntarily suspended disconnections at the inception of the pandemic, and many went further to assist their customers. Service providers will continue to support their customers even after the moratorium ends, but they will need flexibility to develop solutions responsive to the circumstances at hand to both help their customers and help the economy move forward.

Verizon is just one example of a service provider offering assistance to its customers who built-up past due amounts while disconnections and late fees are suspended. Any residential or small business landline customer in Vermont who signs up through June 30 for Verizon's Pledge

[1] *See* Addendum 14 to Executive Order No. 01-20, issued on May 15, 2020.

commitments will also be automatically enrolled in a six-month deferred bill program to make it easier to get back on track paying off balances after June. After the Pledge expires in June, customers who tell us that they have financial difficulties that are affecting their ability to repay their accrued balance will get personal assistance in working out a repayment arrangement. These customers will be offered a minimum three-month installment payment plan, and Verizon is prepared to work with these customers regarding other payment arrangements, such as future-dated payments and scheduled payment plans, to suit their needs.[2]

In light of these and similar programs offered by other service providers, there is no need to require service providers to offer a twelve-month repayment plan, and such a requirement is too rigid and may hamstring recovery efforts. As the Commission knows, the situation facing consumers, businesses, and governments is evolving rapidly. June of 2021 (when a twelve-month plan would end) is an eternity away at this point. Instead of imposing a very long and inflexible payment plan requirement, the Commission should allow service providers the flexibility to be creative to develop solutions to help customers hit by economic hardship while also helping to get the economy going again to avoid prolonging that hardship into the future.

In addition, the Department's one-size-fits-all approach does not account for very real differences between telecommunications services and the traditional utility services subject to

[2] Verizon's pandemic-related, customer support programs are by no means limited to purchasers of landline services regulated by the Commission. For example, at the outset of the pandemic, we added 15 GB of data for no charge to the plans of wireless and small business customers on metered plans, 15 GB of 4G LTE hotspot data to wireless customers on unlimited plans, and 15 GB of data to Jetpack plans. We later added another 15 GB of data to the same plans for use in May. And we're also offering unlimited domestic calling to wireless customers on limited-minute plans through May 31. Wireless customers who sign up for the Pledge commitments will be allowed to repay their unpaid service charges over six months, while unpaid device payment installments will be deferred to the end of a device payment agreement. Likewise, where Verizon affiliates offer internet service, we are offering new affordable internet plans for new Lifeline customers, including Fios 200/200Mbps home internet service for just $19.99/month with a free year of Disney+ and no router rental charges. To help existing Lifeline customers, Verizon is waiving the next two billing cycles of Lifeline-qualified home service charges across both home broadband and home voice. Additional information about what Verizon is doing to help its customers during the pandemic is available at verizon.com/about/news/our-response-coronavirus.

Commission regulation. Telecommunications providers operate in a highly competitive market in which their rates are governed by market forces. Unlike rate-regulated gas, water and electricity utilities, telecommunications providers have limited, if any, ability to recover in their rates the costs that they are now incurring to support their customers, such as uncollectable accounts receivable, let alone the massive additional costs they would incur under a 12-month payment plan requirement.

Verizon understands how important it is for people to stay connected and for businesses to stay connected with their customers during this difficult time for our nation. We appreciate the efforts of the Commission and the Department toward those ends as well, but for the reasons stated above, the Commission should not extend the moratorium beyond June 30 or implement the Department's suggested payment plan requirement.

Respectfully submitted,

MCI COMMUNICATIONS SERVICES,
INC. and MCI METRO ACCESS
TRANSMISSION SERVICES, INC.

By their attorney

Alexander Moore cs

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Dated: May 22, 2020