



Jeffrey B Austin  
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**VIA ePUC**

April 24, 2020

Ms. Judith C. Whitney, Clerk  
VERMONT PUBLIC UTILITY COMMISSION  
People's United Bank Building, 4<sup>th</sup> Floor  
112 State Street  
Montpelier, VT 05620-2701

Re: CONSOLIDATED COMMUNICATIONS Comments  
Case No. 20-0703-PET: Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency

Dear Ms. Whitney:

Consolidated Communications of Vermont Company, LLC d/b/a Consolidated Communications ("Consolidated" or "Consolidated Communications") submits the following comments as requested by the Public Utility Commission ("Commission") in its March 27, 2020 Order in the above-referenced Case. Specifically, Consolidated responds to the Commission's request for comments addressing what should be done with the arrearages that will have accumulated during the period of the moratorium.

Consolidated appreciates and supports the Commission's and other parties' efforts to ensure continued essential services to all Vermonters who are impacted by the COVID-19 pandemic.

Consolidated has reviewed the comments submitted on April 20, 2020 by Eight Vermont rural local exchange carriers (the "Eight RLECs"). Consolidated generally agrees with, and through this letter incorporates by reference, the concerns the Eight RLECs articulated regarding recovery of uncollectibles and restarting disconnections following the moratorium.

Consolidated is focused on providing and maintaining essential services for our Vermont customers while addressing COVID-19-related matters for our company and our customers in our 23 state national service territory. Consolidated, like the Eight RLECS, is experiencing an increase in the amount of uncollectible revenue on its books as a consequence of its suspension of involuntary disconnections. Consolidated would support a workshop or any other Commission process that would facilitate collaboration between the Commission, local exchange carriers, the Department of Public Service, and other stakeholders to explore options for revenue recovery mechanisms to address the expected increase in uncollectible revenue.



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The Commission Orders issued in this Case on March 18, 2020, and March 27, 2020, in contrast to the FCC Keep Americans Connected Pledge from March 13, 2020, do not provide a path to identify Vermonters experiencing an inability to pay their bills due to the disruptions caused by the COVID-19 pandemic, but rather apply to all customers. Attempting to retroactively determine which customers experienced a financial hardship due to COVID-19 will be virtually impossible as a practical matter. This leaves carriers to treat all customers experiencing arrearages equally once the disconnect moratorium has been lifted and the involuntary disconnect process resumes. The full effects of this pandemic on customers' inability to pay may take months, or longer, to be fully realized. Absent a state or federal program that reimburses carriers for customers that are experiencing an inability to pay, Consolidated's only viable option will be to work with customers that contact us to negotiate acceptable payment arrangements, just as we do now for customers. Consolidated encourages any Vermont customer experiencing a financial hardship related to COVID-19, or for another reason, to contact us and discuss payment options.

As for arrearages that have accumulated during the period of the moratorium, Consolidated echoes the Eight RLECs' suggestion to assess whether a fund can be established to provide debt relief to customers whose delinquency is a result of financial disruptions caused by the COVID-19 pandemic. In the shorter term, Consolidated is reviewing whether there are options to shift funds it has allocated for infrastructure build-out to COVID-19-related debt relief.

Consolidated appreciates the opportunity to provide comments to the Commission. Please feel free to contact me with any questions.

CONSOLIDATED COMMUNICATIONS

Sincerely,

A handwritten signature in black ink that reads "Jeffrey B. Austin". The signature is written in a cursive, flowing style.

**Jeffrey Austin**  
Director, Government Relations, VT & NY