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May 22, 2020

VIA ePUC

Ms. Judith Whitney, Clerk
Public Utility Commission
112 State Street, Drawer 20
Montpelier, Vermont 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 and Consolidated Communications of Northland Company, both d/b/a Consolidated Communications ("Consolidated") submit the following comments as requested by the Public Utility Commission ("Commission") in its May 15, 2020 Order in the above-referenced Case. Specifically, Consolidated responds to the Commission's question of whether to extend the temporary moratorium on involuntary disconnections until July 31, 2020.

Consolidated supports the Commission's efforts to ensure ongoing essential services to Vermonters experiencing financial hardships related to the COVID-19 pandemic. At the same time, absent any mechanism for reimbursement of the ongoing aging balances, it is concerned that if the moratorium is extended and aging balances continue to accrue, customers will ultimately be unable to pay down their overdue balances.

The full impact of the COVID-19 pandemic will take time to be realized, and in some sectors this could be months or even years. However, through the course of the last several weeks, Consolidated has begun to have a greater understanding of the impact the moratorium has had on the company and our customers. To date, Consolidated's uncollectible revenue in Vermont is up by approximately 29%, as compared to July, 2019. The largest past due increases are in the over 60 and 90 day past due aging, which coincides with the disconnection moratorium.

The larger these balances grow, it becomes increasingly difficult to establish some type of payment arrangement that will allow a customer to pay their current charges while making incremental payments toward the back balance that has accrued. Unfortunately, for some customers, this will result in an inability to pay the back balances, even with additional time

allotted and generous payment arrangements. This will be a hardship and a loss to the customer, and will also jeopardize some providers' ability to remain financially viable.

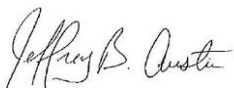
The Eight RLECs, in their comments of April 20, 2020, noted that they, unlike electric utilities, are unable to recover these lost revenues in future rate cases. Consolidated echoes these sentiments and is concerned about the impact of increased uncollectible balances on the company during the same time that the Department recently issued a Call to Action to broadband companies to invest and expand internet services to unserved locations in Vermont. If allowed to continue for a further, extended period of time, these balances will have a significant negative impact on revenue which may, in turn, hinder our ability to continue planned investments in infrastructure.

In the Department's comments in this case dated May 8, 2020, they advised that "customers whose arrearages built during the moratorium could be afforded up to twelve months to pay back their debt." Consolidated is supportive of working with customers and making payment arrangements and does so currently in the context of PUC Rule 7.600. We do now, and expect to continue to, offer extended payment arrangements when necessary within the existing framework of our systems. It may not be feasible to create a "one-size-fits-all" approach to repayment without further conversations with providers regarding the flexibility of their systems.

Consolidated has extended its FCC Keep Americans Connected Pledge through June 30, 2020, which provides customers that experience an inability to pay their bills due to financial hardships resulting from the COVID-19 pandemic the ability to self-declare to participating utilities to ensure their essential services will not be interrupted, and ensure that customers will not be billed late payment charges. This provides an opportunity for the customer and the utility to discuss the customer's current financial situation and provide payment options that could help these customers manage their accounts for the short and long-term.

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

Regards,

A handwritten signature in cursive script that reads "Jeffrey B. Austin".

Jeffrey B. Austin