

**STATE OF VERMONT  
PUBLIC SERVICE BOARD**

Case No. 20-0703-PET

Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency
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**CENTURYLINK OPERATING COMPANIES' RESPONSE TO  
UTILITY PLANS DATED JUNE 19, 2020**

CenturyLink Communications, LLC, Level 3 Communications, LLC, Broadwing Communications, LLC, TelCove Operations, LLC, WilTel Communications, LLC, Global Crossing Telecommunications, Inc., Global Crossing Local Services, Inc., and Level 3 Telecom Data Services, LLC (jointly referred to hereafter as “CenturyLink Operating Companies”) provide the following response to the Commission’s May 28, 2020 Procedural Order in which it requested each utility file the following information:

1. What is the magnitude of past-due balances and how many customers have past-due balances? How does this compare with the same time period last year? Please break out this data into residential and non-residential customers.

**Response:** CenturyLink is a competitive carrier primarily offering IP-based voice and data services to business in Vermont. CenturyLink was one of the initial signatories to the FCC’s Keep Americans Connected Pledge. As of May 2020, CenturyLink has 1,947 business accounts in Vermont that have a past due balance; however, the past due balance on those accounts may or may not be directly related to COVID-19. CenturyLink currently has 13 accounts that have specifically asked for extended payment terms related to financial impacts on the respective business customers directly impact by COVID-19. The total past due amount associated with those 13 accounts is \$707,462.65. At this same time in May 2019, CenturyLink records reflect that it had 564 business accounts in arrears.

2. How will past-due balances accrued during the moratorium be addressed with customers, and how will past-due balances accrued before or after the moratorium be addressed with customers?

**Response:** CenturyLink understands that customers that have accrued past-due balances may need additional time to repay those amounts. CenturyLink is currently reviewing its payment arrangement policies and will follow any applicable contractual or tariff requirements concerning billing and payment arrangements.

3. Will reasonable payment arrangements be made available? If so, of what duration?

**Response:** CenturyLink is currently reviewing its payment arrangement policies to determine how best to accommodate these customers. Given the breadth and scope of its business products and service offerings in Vermont, CenturyLink will continually evaluate the needs of its business customers as outlined in Question 2 above.

4. Will late fees be imposed or waived for past-due balances accrued before, during, or after the moratorium?

**Response:** As part of our commitment to the FCC's Keep Americans Connected Pledge, CenturyLink waives late fees due to financial circumstances associated with the COVID-19 pandemic.

5. Is the utility seeking outside funds (e.g., federal or private monies) to help offset the past-due balances accrued as a result of the moratorium? If so, and if such funds are received, how will the utility apply the funds to its customers' arrearages?

**Response:** CenturyLink is not currently seeking outside funding to offset past-due balances, but if funding becomes available CenturyLink would anticipate that any future support program for that purposes would set forth the terms for its application.

June 18, 2020

Respectfully submitted,

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