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Alexander W. Moore
Associate General Counsel

June 19, 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 Transition Plan of Verizon. Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Alexander Moore" followed by a stylized initial "CS".

Alexander W. Moore

Enclosure

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

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

TRANSITION PLAN 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 pursuant to the Order Extending Moratorium and Requesting Utility Plans entered on May 28, 2020 (“Order”).

Verizon appreciates the Commission’s acknowledgement that service providers may have been affected differently by the pandemic and the moratorium, and that a “one-size-fits-all” approach to reinstating routine service-disconnection activities may not be appropriate. *See* Order at 2. As Verizon notes in its Comments filed on May 22, telecommunications providers operate in a highly competitive market and, unlike traditional utilities, have limited if any ability to recover in their rates the costs they incur as a result of the moratorium.¹ The Commission should therefore refrain from imposing additional requirements, and thus costs, on telecommunications providers when the moratorium is lifted.

Verizon understands that many of its customers will continue to need support after the moratorium is lifted, and it has designed a plan to do just that as we transition back to business-as-usual (or as usual as can be). The company’s voluntary commitment to waive late fees and to

¹ Verizon is not seeking outside funds to help offset the past-due balances accrued as a result of the moratorium.

not terminate service for those consumers and small businesses who are unable to pay their bills due to disruptions caused by the coronavirus runs to June 30. Residential and small business landline customers in Vermont who sign up through June 30 for these commitments will also be offered a six-month payment plan commencing as of that date, to make it easier to get back on track paying off balances after June. Customers will be protected from disconnection as long as they abide by the agreed-upon plan.

Customers who tell us, after the Pledge expires on June 30, 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 three-month installment payment plan, and Verizon is prepared to work with these customers regarding other payment arrangements. For all of our Vermont customers, new debts accruing after June 30 will be subject to our regular collections processes.

Verizon's continuing customer support program and similar programs offered by other service providers make it unnecessary for the Commission to mandate a specific payment plan or other transition requirements following expiration of the moratorium. Given this, the

Commission should not impose any such requirements on telecommunications providers, who are subject to market forces and cannot simply raise their rates to cover the resulting costs.

Respectfully submitted,

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

By their attorney

Handwritten signature in blue ink that reads "Alexander Moore CS".

Associate General Counsel
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Dated: June 19, 2020