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STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-0703-PET

Vermont Legal Aid request for moratorium on
utility and telecommunications shutoffs during
State of Emergency

**Response of AT&T Corp. to Order
Extending Moratorium and Requesting Utility Plans**

AT&T Corp. (“AT&T”) submit the following responses to the five questions posed to utilities by the Public Utility Commission in its May 28, 2020, Order Extending Moratorium and Requesting Utility Plans (“Order”). Those questions seek information from each utility on how it proposes “to reinstate routine service-disconnection activities in light of its particular circumstances.” Order at 2-3. AT&T’s answers assume that July 31, 2020, is the end date for the moratorium imposed by the Commission. Any change to the moratorium end date could cause a change in AT&T’s plans.

In general, AT&T plans to return mostly to Business as Usual (BAU) collections efforts once the current FCC Keep Americans Connected Pledge ends, except in those states – such as Vermont – with specific Orders impacting these collection efforts that extend past the end of the FCC Pledge. That is, AT&T will return to imposing service suspensions and disconnections per its usual BAU processes. However, as discussed below, the company will continue to extend payment arrangements to customers that assert economic hardship due to COVID-19 reasons for outstanding debt accumulated through the end of Vermont’s mandated disconnection moratorium.

Questions:

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:

Residential:

- 33.76 percent of customer billings were past due as of May 1, 2020 (13.15 percent of accounts)

- 66.47 percent of customer billings were past due as of May 1, 2019 (22.09 percent of accounts)

Small Business:

- 48.66 percent of customer billings were past due as of June 1, 2020 (33.33 percent of accounts)
- AT&T cannot provide a snapshot of comparable information for June 2019.

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:

Regardless of when the customer's charges were accrued, the past due balance will be due and payable upon release from the mandated treatment hold (i.e., after July 31). As discussed in the response to Question 3, AT&T will extend payment arrangements to residential and small business customers that assert economic hardship due to COVID-19 through the end of Vermont's mandated disconnection moratorium.

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

Response:

Reasonable payment arrangements will be offered to residential and small business customers that request them. Each account will be evaluated individually based upon history and size of balance to determine the length of payment arrangements.

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

Response:

Late payment fees accruing on past due balances during Vermont's mandated disconnection moratorium will be waived for residential and small business customers that assert economic hardship due to COVID-19. Late payment fees assessed on past due balances that were incurred prior to the imposition of Vermont's moratorium or that will accrue after the moratorium ends will be due and collectible based upon normal business practices.

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:

AT&T is not seeking outside funds to help offset the past-due balances that have accrued as a result of Vermont's mandated disconnection moratorium.

Respectfully submitted,

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