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September 17, 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 September 3, 2020 Order in the above-referenced Case.

As indicated in previous filings, Consolidated supports the Commission's efforts to ensure ongoing essential services to Vermonters experiencing financial hardships related to the COVID-19 pandemic. Consolidated applauds the Department of Public Service's hard work in developing and implementing the COVID-19 Arrearage Assistance Program and we agree that it will have a positive impact for participating customers experiencing a financial hardship during this time. Consolidated continues to believe, however, that further extending the moratorium will make it more difficult for customers to pay down their accumulated overdue balances.

Consolidated signed, and extended its participation in, the FCC Keep Americans Connected Pledge through June 30, 2020. This provided customers that experienced 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 would not be interrupted. This also provided 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 fears that by extending the moratorium, some customers will not be inclined to contact their providers to discuss service options that may lower their bills, therefore making repayment easier, or to negotiate a payment arrangement that will keep them current on any new charges while incrementally making progress toward paying any outstanding balances.

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 operates billing and collections platforms that cover our twenty-three state footprint and changes to the systems can require significant resources and cost, as well as taking time to implement. The larger these balances grow, the more difficult it becomes 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.

The Commission requested the commenters’ response to the specific suggestions provided by the Department in its comments of July 10, 2020. Consolidated’s responses are below:

1. Permanently waive any late fees applicable to the period of the moratorium.

RESPONSE: Late fees associated with basic telephone service are minimal and would likely amount to less than a few dollars for most customers during the period of moratorium. The work associated with waiving these fees retroactively would be cost prohibitive.

2. Provide a minimum six-month payment arrangement, if a payment arrangement is requested by the customer to repay arrearages.

RESPONSE: Consolidated regularly works with customers to establish payment arrangements to meet their needs. Long-term payment arrangements, such as six months or greater, will be an exception, as Consolidated has determined that such long-term arrangements are usually not in the best interest of the customer. Rather, it is often beneficial for customers to review their bills and services with customer service and possibly to modify their services for a short time in order to reduce their monthly charges and catch up on any past due balances.

3. Provide notice before sending an account to collections.

RESPONSE: Consolidated provides notices to customers as part of the normal course of business prior to any suspension or disconnection of service. Additionally, customers are sent a “final demand notice” advising customers their account will be referred to a collection agency prior to any unpaid balance being referred to an outside collection agency.

4. Allow consumers that were placed in collections for COVID-19 related arrearages to make a reasonable six-month (or longer) payment arrangement to restore services.

RESPONSE: At this time, no customers’ basic phone service has been interrupted as the result of COVID-19 arrearages, meaning no restoral of services is necessary. Once the moratorium is lifted, customers will be encouraged to establish payment arrangements to assist in repaying any unpaid overdue balances.

5. Include a bill stuffer and/or utilize other electronic means (emails, web, social media) to communicate with customers to encourage applications to the Vermont Arrearage Assistance Program.

RESPONSE: Consolidated has plans to include a bill message encouraging customers to apply for the Vermont Arrearage Assistance program. We have updated the Coronavirus specific pages on our website to include this information as well.

6. Suspend disconnections to any home with a terminally ill household member or a household member relying on life sustaining equipment.

RESPONSE: Consolidated is willing to consider this option depending on what type of guidance is offered to establish a specific process for this request. Without such, Consolidated believes this would be extremely difficult to manage and verify, and could result in extended periods of

service being provided without payment or confirmation of a valid medical reason for continued service.

Additionally, to answer the specific questions posed by the Commission, Consolidated offers the following:

- The current moratorium applies to both residential and non-residential programs, but many consumer protections apply only to residential customers. After the moratorium, would utilities apply consumer protections (such as extended payment arrangements) to both residential and non-residential customers?

RESPONSE: Consolidated will continue to work with residential and non-residential customers that require assistance by establishing payment arrangements.

- Will any utilities impose on themselves a disconnection moratorium even if the Commission's moratorium is no longer in place? If so, how long would such a moratorium last?

RESPONSE: Consolidated will not self-impose an extended disconnection moratorium if the Commission's moratorium is no longer in place.

- Will the utilities offer payment arrangements of substantial lengths (such as 12 or even 24 months)?

RESPONSE: See above. Consolidated regularly works with customers to establish payment arrangements to meet their needs. Long-term payment arrangements, such as 12 or 24 months, will be an exception, as Consolidated has determined that such long-term arrangements are usually not in the best interest of the customer. Rather, it is often beneficial for customers to review their bills and services with customer service and possibly to modify their services for a short time in order to reduce their monthly charges and catch up on any past due balances.

- Will the utilities waive any fees and deposits and allow deposits to go toward arrearages?


RESPONSE: Consolidated does not currently require deposits on telephone services in Vermont.

- Will the utilities consider streamlining enrollment into any existing consumer assistance programs (e.g., auto-enrollment, allowing self-certification, etc.)?

RESPONSE: Consolidated will continue to support the Department of Public Service's COVID-19 Arrearage Assistance Program to the best of our ability to ensure timely processing of any customer assistance requests. Consolidated has no other comments to add regarding any other assistance programs that may exist for utilities other than telecommunications services.

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

Regards,



Jeffrey B. Austin