



Erika P. Smith  
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December 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 December 14, 2020 Order in the above-referenced Case.

Consolidated understands that many Vermonters continue to face hardships as the result of the COVID-19 pandemic and supports the Commission's efforts to ensure ongoing essential services are available to customers. We also respect the Department of Public Service's hard work in developing and implementing the COVID-19 Arrearage Assistance Program. We believe, however, that both our customers and our company will be best served if we are able to assist customers in managing their past due balances on an individual basis, rather than with the reinstatement of a blanket moratorium on disconnections for all utilities.

As indicated in previous filings, 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 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. By allowing the disconnection process to continue, proactive customers can reach out to Consolidated 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.

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Consolidated actively participated in the Vermont Arrearage Assistance Program, as of Monday, December 7 we had approved one hundred eighty-six (186) customers for funding. While this is a great help for the customers who were approved, it is only a small percentage of the total customers currently behind in paying their basic telephone charges. Many customers who are past due have not engaged with us to set up a payment arrangement, and we expect that will likely continue if the disconnection moratorium is reinstated. As past due balances continue to grow it becomes increasingly difficult to mutually agree upon a payment arrangement that will allow a customer to pay their current charges while making incremental reductions in the total overdue balance.

Consolidated has been and remains concerned about the ongoing impacts to customers as the result of the COVID-19 pandemic. It must also be noted that COVID-19, and more specifically growing arrearages as the result of the pandemic, have had, and will continue to have, a negative impact on providers. Telecommunications providers do not have the same mechanisms in place to recover these arrearages as some other sectors do. Absent an alternate form of funding to assist additional customers in repayment of their telecommunications bills, or another method to support providers who are experiencing larger than normal uncollectable amounts, Consolidated respectfully objects to the moratorium being reinstated.

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

Regards,

A handwritten signature in black ink, appearing to read "EP Smith". The signature is written in a cursive, flowing style.

Erika P. Smith