

**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

LUMEN/CENTURYLINK RESPONSE TO ORDER ENTERED 12/22/2020

CenturyLink Communications, LLC, Level 3 Communications, LLC, Broadwing Communications, LLC, TelCove Operations, LLC, WiTel Communications, LLC, Global Crossing Telecommunications, Inc., Global Crossing Local Services, Inc., and Level 3 Telecom Data Services, LLC¹ provide the following response to the Order entered December 22, 2020 by the Vermont Public Utility Commission. Ordering paragraph 4 of that Order requested each utility to file the following information:

- 1. What is the magnitude of customer balances that are more than 60 days past due, the number of customers with balances that are more than 60 days past due, and how these data compare with the same time period in 2020? Please break out into residential and non-residential customers.**

Response: For this request, Lumen/CenturyLink has defined “the number of customers with balances that are more than 60 days past due” as those accounts with any past due balances more than 60 days in arrears at the time of the respective data pull. Therefore, the total number of accounts reflected below overstates the number of accounts that would be subject to termination. Furthermore, the amount of “customer balances that are more than 60 days past due” includes accounts with any past due amounts for services both jurisdictional and non-jurisdictional.

Lumen/CenturyLink is a competitive carrier primarily offering IP-based voice and data services primarily to business accounts in Vermont. As of February 26, 2021,

¹ On September 14, 2020, CenturyLink, Inc., the ultimate parent of the certificated entities responding to this Vermont Commission Order, announced the launch of its “Lumen” brand. Effective September 18, 2020, the stock of CenturyLink, Inc. began trading under the symbol “LUMN.” On January 22, 2021, CenturyLink, Inc. formally changed its name to Lumen Technologies, Inc. As a result, CenturyLink, Inc. is now referred to as “Lumen Technologies,” or simply “Lumen.” For purposes of this filing, the operating companies of Lumen shall be jointly referred to as “Lumen/CenturyLink.”

Lumen/CenturyLink has 474 business customer accounts in Vermont with some form of a past due balance; however, the past due balance on those accounts may or may not be directly related to COVID-19. As of February 26, 2021, the total balance that is impacted by those 474 past due accounts is \$1,756,587.

At this same time last year, on March 1, 2020, Lumen/CenturyLink records reflect that it had 178 business customer accounts in arrears. The total balance amount that was associated with those 178 past due accounts was \$664,461.

- 2. What is the number of customers with whom the utility has interacted to set up a payment agreement between the date of the issuance of this Order and March 1, 2021?**

Response: Lumen/CenturyLink does not readily retain information as to the number or percentage of customers who have discussed payment plans or who have sought to participate in payment plans.

- 3. What is the number of payment agreements entered into between the date of the issuance of this Order and March 1, 2021?**

Response: For the period of December 22, 2020 to February 28, 2021, Lumen/CenturyLink had 3 business customer accounts that agreed to a payment arrangement due to alleged impacts of COVID-19.

- 4. What is the number of payment agreements successfully adhered to by the customer between the date of this issuance of this Order and March 1, 2021?**

Response: For the period of December 22, 2020 to February 28, 2021, Lumen/CenturyLink had 3 business customer accounts that agreed to a payment arrangement due to alleged impacts of COVID-19. All 3 business customer accounts have successfully adhered to their payment agreement terms.

- 5. Comments on whether the moratorium should be extended beyond March 31, 2021.**

Response: Lumen/CenturyLink supports lifting the existing moratorium. Lumen/CenturyLink is certificated in Vermont to provide various competitive telecommunications services and currently provides such services to business customers in the state. Lumen/CenturyLink has worked diligently with its customers in Vermont and elsewhere during COVID to ensure that business needs are met relative to both its customers and the company. As noted in prior submissions to this Commission, from Lumen/CenturyLink's standpoint, the moratorium is unnecessary and unwarranted. To the extent the Commission

decides to extend the moratorium, Lumen/CenturyLink continues to support limiting application of the moratorium's reach to certificated telecommunications companies serving residential customers or to telecommunications utilities subject to rate-of-return regulation in the State of Vermont.

March 1, 2021

Respectfully submitted,

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