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June 14, 2021

VIA ePUC

Ms. Holly Anderson, 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. Anderson,

The Public Utility Commission (“Commission”), in its May 24, 2021 Order in the above-referenced Case, directed utilities in this proceeding to file descriptions of how they will engage with customers to resolve outstanding, past-due balances after the temporary moratorium ends and how they will address terminations of service for nonpayment going forward. 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.

As indicated in previous comments, Consolidated appreciates the work of the Commission to ensure ongoing essential services remain available to customers. We also acknowledge the hard work of the Department of Public Service in developing and implementing the COVID-19 Arrearage Assistance Program and the Temporary Broadband Subsidy Program. All of these efforts helped Vermonters who faced hardships as the result of the COVID-19 pandemic stay connected.

Upon discontinuation of the moratorium, Consolidated will resume sending disconnection notices and generating outbound calls to customers with a past due balance, as part of the normal course of business, prior to any suspension or disconnection of service. We are hopeful this will encourage customers to reach out directly and allow Consolidated to assist in addressing their past due balances should they be unable to pay in full. We will continue to work with residential and non-residential customers that require assistance by establishing payment arrangements 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. Consolidated operates billing and collections platforms that cover our twenty-three state footprint and changes to the systems to expand the repayment options would take time to implement and can require significant resources and cost. 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.

In addition to establishing payment arrangements, we will encourage customers to work with our customer service teams to ensure they subscribe to the most cost effective plans that meet their needs. If necessary, we can also modify their services for a short time in order to reduce their monthly

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charges. If a customer's new monthly charges can be lowered, this may assist them in making payments to catch up on any past due balances while keeping their new charges each month current.

By allowing the disconnection process to continue, proactive customers can reach out to Consolidated as described to establish a payment arrangement, modify their services, or do both helping to move toward a more typical payment process free of any past due balance.

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