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June 14, 2021

**VIA ELECTRONIC FILE**

Judith C. Whitney  
Clerk of Commission  
112 State Street  
Montpelier, VT 05620-2701

Re: CenturyLink Operating Companies' Response to Order Reinstating the Temporary  
Moratorium on Disconnection  
Case No. 20-0703-PET

Dear Ms. Whitney:

This letter is to notify the Public Utility Commission of Vermont ("Commission") that CenturyLink Communications, LLC, Level 3 Communications, LLC, Broadwing Communications, LLC, TelCove Operations, LLC, WilTel Communications, LLC, Global Crossing Telecommunications, Inc., Global Crossing Local Services, Inc., and Level 3 Telecom Data Services, LLC (jointly referred to hereafter as "CenturyLink Operating Companies") provide the following responses to the Commission's May 24, 2021 Procedural Order, Paragraph on Page 2.

If you have any questions, or need additional information about the above, please contact me at (717) 775-3088.

Very truly yours,

Sue Benedek, Esquire

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**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
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**LUMEN/CENTURYLINK RESPONSE TO ORDER ENTERED 5/24/2021**

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, LLC<sup>1</sup> provide the following response to the Order entered May 24, 2021 by the Vermont Public Utility Commission. Ordering paragraph on page 2 of that Order requested each utility to file the following information: “Detailed 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.”

**Questions:**

- 1. How will Lumen/CenturyLink engage with customers to resolve outstanding, past-due balances after the moratorium ends?**

**Response:** For purposes of this response, Lumen/CenturyLink notes that it does not have residential customers in the State of Vermont. Generally, Lumen/CenturyLink will work with its business customers to assist with the resolution of an outstanding, past-due balance. This practice will continue after the moratorium ends. Specifically, as part of our standard engagement process, Lumen/CenturyLink will take the following steps to prevent the disconnection of service due to non-payment:

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<sup>1</sup> 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 matter, the operating companies of Lumen shall be jointly referred to as “Lumen/CenturyLink.”

- Lumen/CenturyLink will send a friendly reminder to the customer as the initial notification.
- If the customer does not respond, or full payment is not received by Lumen/CenturyLink, a Suspension letter will be delivered to the customer.
- If no response is received from the customer, or a payment is not provided as outlined in the Suspension letter, Lumen/CenturyLink will place a call to the customer.
- If Lumen/CenturyLink is unsuccessful with reaching the customer, securing a payment for the past-due balance, or negotiating a payment arrangement with the customer, then service for the account could be suspended for non-payment.

The overall goal of this process involves several attempts to: (a) reach the customer to obtain a payment that will cover the past-due balance; and/or (b) reach an agreement on a payment arrangement, as applicable.

**2. How will Lumen/CenturyLink address terminations of service for non-payment going forward?**

**Response:** Please see the response to Question 1.

June 14, 2021

Respectfully submitted,

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