

**Exh. BF-2
Docket UT-210902
Witness: Bridgit Feeser**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CENTURYLINK COMMUNICATIONS
LCC d/b/a LUMEN TECHNOLOGIES
GROUP; QWEST CORPORATION;
CENTURYTEL OF WASHINGTON,
INC.; CENTURYTEL OF INTER
ISLAND, INC.; CENTURYTEL OF
COWICHE, INC.; UNITED
TELEPHONE COMPANY OF THE
NORTHWEST,**

Respondents.

DOCKET UT-210902

EXHIBIT TO TESTIMONY OF

BRIDGIT FEESER

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Oct. 12, 2021, CenturyLink Response to UTC Staff Informal Data Request
in Docket U-200281*

August 25, 2022

U-200281

LUMEN®

October 12, 2021

State OF WASH.
UTIL. AND TRANSP.
COMMISSION

10/12/21 16:40

Received
Records Management

Via Web Portal

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: Docket No.: U-200281
Response to Commission Staff's Informal Data Requests

Dear Ms. Maxwell:

We're writing to share our responses to the WUTC Staff's informal data requests issued on September 16, 2021.

As a company, we understand the pandemic has had significant impacts on many of our customers. We're committed to doing our part to help keep customers connected and are happy to work with them on payment arrangements.

Please note that by providing these responses, CenturyLink in no way concedes that it is obligated to submit such responses pursuant to any Commission rule, statute, or order. CenturyLink is providing these responses for information only, and CenturyLink hereby reserves, and expressly does not waive, all rights, remedies, and defenses related to Staff's informal data requests or our responses thereto. Further, by providing such responses, CenturyLink does not grant or concede Commission jurisdiction over CenturyLink with regard to this proceeding or the subject matter thereof.

1. Please provide the total number of customers in arrears and the total dollar amounts of such arrearages during the pandemic period from March 2020 to August 2021.

We use multiple billing systems for our Washington state consumer operations. Between March 2020 and August 2021, there were 14,792 customers with past due balances on average per month in an aggregate monthly average amount of \$2,023,417 on one of our two main billing systems. Unfortunately, this information is not readily available for customers served by our second main billing system. Identifying each customer on that billing system who was in arrears over the course of 17 months, as well as the total amount of those arrearages, would be extremely burdensome.

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2. Please provide the most current number of customers with past-due balances that are more than 90 days past due.

As noted above, we use multiple billing systems for our Washington state consumer operations. Our records show that 480 customers served by the one of our two main billing systems have past-due balances that are more than 90 days old. Unfortunately, this information does not exist in our other billing system.

3. Please provide the number of customers disconnected for late payment or lack of payment each month during the period from March 2020 to August 2021.

We recently discovered that billing system process errors led to 407 customers of our residential voice system in Washington being involuntarily disconnected for non-payment between March 2020 and August 2021. More than half of those customers (243) were already suspended for non-payment prior to March 2020 and thus did not experience a change in availability as a result of moving from suspended to disconnected status. Those disconnections occurred in July 2020. The 407 disconnections occurred as follows:

Jul-20	243
Aug-20	6
Sep-20	15
Oct-20	2
Nov-20	3
Dec-20	11
Jan-21	18
Feb-21	12
Mar-21	21
Apr-21	1
May-21	17
Jun-21	24
Jul-21	11
Aug-21	23

4. Does the company charge for disconnection and/or reconnection? If so, please provide the number of and the actual price charged to a customer for disconnections and/or reconnection during the last 18 months from March 2020 to August 2021.

We do not assess a “disconnection charge,” although disconnected customers are charged installation fees if they later choose to subscribe to our services. We do assess a smaller “reconnection charge” for customers whose service has been suspended for non-payment, but not fully disconnected. Between April 2020 and August 2021, we assessed reconnection charges to

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Washington voice customers a total of 1,634 times. The reconnection charge is either \$20 or \$25, depending on the customer's location.

5. Please identify the number of customers assessed late payment fees during the last 18 months from March 2020 to August 2021.

In September 2020, we inadvertently charged some customers in Washington state late fees for telephone service, but we have since issued credits or refunds. Despite our best intentions to continue waiving late fees for Washington residential customers through the end of any Proclamation periods, a system error inadvertently charged late fees to 39,799 residential customers over a period of approximately eight months. The mistake was fixed and programming corrected. We issued credits or refunds to all affected customers, educated our employees about the process, and placed a note on every affected customer's account identifying the mistake. For those customers who had not paid the late fees, we removed the late fees from their bills. We issued a total of \$1,345,637.00 in credits and refunds to customers who had inadvertently been charged late fees. All credits and refunds were completed by June 30, 2021.

6. Please provide the total number of Lifeline customers in 2019 and in 2020.

As of December 31, 2019, we had 4,650 Lifeline customers in Washington state. As of December 31, 2020, we had 4,151 Lifeline customers in Washington state.

We would be happy to discuss any of the above responses with you.

Sincerely,



Adam L. Sherr
Assistant General Counsel

ALS/jga