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November 19, 2026

VIA EMAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket No. UM 2475 – In the Matter of CenturyTel of Oregon, Inc., Application to Revise Allocated Service Territory or Waive Carrier of Last Resort Obligations, Abandon Certain Exchange Access Services, and Relinquish ETC and ETP Designations in the Merrill, Oregon Exchange.

Attention Filing Center:

Attached for filing in the above-captioned docket, please find CenturyTel of Oregon, Inc.'s (hereinafter "CenturyLink") Application to Revise Allocated Service Territory or Waive Carrier of Last Resort Obligations, Abandon Certain Exchange Access Services, and Relinquish ETC and ETP Designations in the Merrill, Oregon Exchange.

This filing contains information designated by CenturyLink as confidential and is provided subject to the provisions in General Protective Order No. 23-132.

Please contact this office with any questions.

Sincerely,

Ellie X. Howard

Ellie X. Howard
Paralegal
McDowell Rackner Gibson PC

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

In the Matter of CENTURYTEL OF OREGON, INC. Application to Revise Allocated Service Territory or Waive Carrier of Last Resort Obligations, Abandon Certain Exchange Access Services, and Relinquish ETC and ETP Designations in the Merrill, Oregon Exchange	**APPLICATION OF CENTURYLINK TO REVISE ALLOCATED SERVICE TERRITORY OR WAIVE CARRIER OF LAST RESORT OBLIGATIONS, ABANDON CERTAIN EXCHANGE ACCESS SERVICES, AND RELINQUISH ETC AND ETP DESIGNATIONS IN THE MERRILL, OREGON EXCHANGE**

CenturyTel of Oregon, Inc. (hereinafter, "CenturyLink") hereby petitions the Public Utility Commission of Oregon ("Commission") for authority to: (1) revise its allocated territory by unallocating from CenturyLink's territory the Merrill, Oregon local telecommunications service exchange ("Merrill Exchange"), or, alternatively, waive carrier of last resort ("COLR") obligations in the Merrill Exchange; (2) discontinue providing intrastate single party residential and business exchange access services and associated features, as defined in CenturyLink's Oregon Basic Exchange Access Service tariff,[1] offered to customers in the Merrill Exchange; and (3) relinquish its Eligible Telecommunications Carrier ("ETC") and Eligible Telecommunications Provider ("ETP") status in the Merrill Exchange.

I. INTRODUCTION

Oregon law "allocates local exchange telecommunications service territory as a geographic area within boundaries set forth in exchange maps filed and approved by the Commission."[2] The

[1] *See* CenturyTel of Oregon, Inc. d/b/a CenturyLink Tariff OR PUC No 6 (available at: https://www.centurylink.com/content/dam/home/about-us/tariff/documents/or_mult_gen_t_no_6.pdf).
[2] *In re Pub. Util. Comm'n of Or., Staff's Reallocation of Local Exchange Telecomms. Serv. Territory for CenturyTel of Or., Inc.*, Docket No. UA 152, Order No. 09-421 at 1 (Oct. 26, 2009).

Merrill Exchange, which includes the City of Merrill, Oregon, is located in southern Klamath County. The Merrill Exchange was allocated to CenturyTel of Oregon, Inc., using the boundaries included in the exchange maps filed with and approved by the Commission in Order No. 09-421.[3] The exchange map of the Merrill Exchange is filed with this Application as Attachment A.

CenturyLink has served a declining number of customers in the Merrill Exchange as competitive alternative providers have emerged over the last thirty years. In the Merrill Exchange, there are approximately 885 broadband serviceable locations ("BSLs"),[4] which roughly equates to (but slightly understates) the number of *potential* customer locations for CenturyLink's local exchange services. As of the date of this Application, CenturyLink serves 110 local exchange telecommunications service customers located in the Merrill exchange. This includes 88 single party residential line service and 22 single party business line service[5] customers who obtain service pursuant to CenturyLink's Basic Exchange Access Service tariffs on file with the Commission.[6] This means CenturyLink provides basic residential and business services to approximately 12.4 percent of the potential customers in the exchange.

The Merrill Exchange does not include customers who meet the definition of "Protected Customer" included in CenturyLink's currently effective Price Plan.[7] Each CenturyLink local

[3] *Id.* at 2.
[4] The number and location of BSLs can be discerned from the FCC's National Broadband Map (available at: https://broadbandmap.fcc.gov/home).
[5] *See* Confidential Attachment E.
[6] *See* CenturyTel of Oregon, Inc. d/b/a CenturyLink Oregon Local Tariff, Basic Exchange Access Service, Section 5, 10thRevised Page 8 (2026). These retail services meet the definitions included in Commission rules of "residential single party flat rate local exchange service" and "business single party flat rate local exchange service, also known as 'simple' business service. *See* OAR 860-032-190(3)(a)—(b).
[7] The definition of "Protected Customer" in CenturyLink's approved Price Plan is as follows: "'Protected Customer' means those CenturyLink residential local service customers in Oregon who, at their residences, have access to only CenturyLink copper-based wireline service and commercial satellite services to make voice calls, as determined by GIS mapping of CenturyLink's local residential customers and the FCC's Broadband Data Collection (BDC) data. Residential customers with access to fiber-based CenturyLink wireline service or mobile wireless, fixed wireless,

exchange customer in the Merrill Exchange has alternative services available from multiple fiber, wireless and/or fixed internet providers.[8]

CenturyLink requests approval by the Commission of this Application, which would authorize CenturyLink to discontinue providing basic local exchange services in the Merrill Exchange and remove the Merrill Exchange from CenturyLink's allocated service territory. If the Commission does not unallocate the Merrill Exchange, CenturyLink alternatively requests that the Commission waive the company's COLR obligations in the exchange. In Section V. of the Application, CenturyLink provides its Notice of Relinquishment of its ETC and ETP designations in the Merrill Exchange, which would terminate CenturyLink's rights to receive universal service support and Lifeline funding for customers in the Merrill Exchange.

CenturyLink's Application includes the following Attachments:

A. Exchange Map of the Merrill Exchange.

B. Letters to Oregon Department of Emergency Management and Intrado regarding Emergency 9-1-1 service transition in the Merrill Exchange.

C. CenturyLink's customer notices sent by direct mail on November 18, 2026.

D. CenturyLink's notice of discontinuance of service to the wholesale competitive local exchange carrier ("CLEC") who uses the CenturyLink network to provide services to customers in Merrill (Confidential).

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cable, or wireline competitive alternatives at their residences are not 'Protected Customers.'" *In re Lumen Tech., Proposed Comm'n Action Pursuant to ORS 756.515 to Suspend and Investigate Price Plan, and Qwest Corp., Investigation Regarding the Provision of Serv. in Jacksonville, Or., and Surrounding Areas*, Docket Nos. UM 1908 & UM 2206, Order No. 24-113, Appendix A at 1 (Apr. 30, 2024) (filed as Attachment A to the Stipulation of Staff and Century Link on October 10, 2023, CenturyLink Price Plan, Section 1(i)).

[8] *See* Attachment F.

E. Matrix of CenturyLink Customer Locations in the Merrill Exchange. (Confidential)

F. Summary of Alternative Services Available to Merrill Exchange Customers.

G. Declaration of Peter J. Gose, CenturyLink Senior Director of Regulatory Affairs, affirming factual assertions included in this Application.

II. CONTACT INFORMATION

CenturyLink requests that the following people receive notices and communications with respect to this Application:

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III. LEGAL STANDARDS GOVERNING THE REQUESTS FOR APPROVAL INCLUDED IN CENTURYLINK'S APPLICATION

A. Request for Unallocation of Territory.

The Commission allocated the Merrill Exchange to CenturyTel of Oregon, Inc. in Order No. 09-421.[9] Oregon statutes do not establish a specific standard for the Commission's unallocation of a portion of allocated territory, nor do they limit the Commission's authority to rescind, suspend, or amend an earlier allocation order. Oregon courts have affirmed that the Commission has plenary authority "to withdraw an order and to reconsider the decision embodied in the order."[10] The Commission's "authority to amend an earlier order is a product of statute,"

[9] Order No. 09-421 at 2.
[10] *SAIF Corp. v. Fisher*, 100 Or App 288, 291 (1990) ("In the absence of a statutory provision limiting its authority to do so, an agency has plenary authority to decide matters committed to it by the legislature. That authority includes the authority to withdraw an order and to reconsider the decision embodied in that order.")

and the courts have determined that ORS 756.568 "grants the commission broad discretion" to "rescind, suspend or amend any order made by the commission."[11]

If the Commission grants the request to unallocate the Merrill Exchange, CenturyLink will, in the Merrill Exchange area, no longer be subject to COLR obligations. Oregon law provides that the "purpose of establishing allocated territories … is to ensure that telecommunications utilities" meet "carrier of last resort obligations."[12] The COLR obligations arise based on the Commission's allocation of service territories to telecommunications utilities.

If the Commission does not unallocate the Merrill Exchange, CenturyLink requests, in the alternative, that the Commission grant a waiver from the COLR obligations for the Merrill Exchange. The grounds supporting waiver of COLR obligations in the Merrill Exchange are identical to the grounds supporting unallocation and abandonment of service that are discussed herein. In the Merrill Exchange, there are multiple alternatives available to CenturyLink's legacy local exchange service, as well as alternative certified ETC and ETP carriers. If CenturyLink no longer has COLR obligations in the Merrill Exchange, "there are alternatives available to the … customers, and therefore, they would not be deprived of 'necessary telecommunications services.'"[13]

B. <u>Request for Abandonment of Service.</u>

Telecommunications utilities may file petitions seeking Commission authorization for "abandonment of service" pursuant to OAR 860-032-0020.[14] OAR 860-032-0020 was

[11] *Indus. Customers of Northwest Utils. v. PUC*, 240 Or App 147, 164 (2010).
[12] ORS 759.506(1) & (2).
[13] *In re Qwest Corp., dba CenturyLink QC, Petition to Abandon 1-800 Calling Serv. Pursuant to OAR 860-032-0020*, Docket No. UM 1838, Order No. 17-248, Appendix A at 3 (July 11, 2017)
[14] OAR 860-032-0020(1)(a) defines "abandon" to as "to discontinue or cease providing."

promulgated to implement ORS 756.040, 759.005, and 759.020.[15] When it last revised the rule, the Commission held that the rule "applies to telecommunications utilities or competitive providers abandoning any intrastate telecommunications service."[16]

The Commission's rule includes specific notice provisions and other requirements a telecommunications utility must meet, all of which are detailed in Section IV of this Application. The Commission's rule authorizing abandonment of services calls on a petitioner to "[d]emonstrate that the abandonment will not deprive the public of necessary telecommunications services."[17]

The Commission has applied this standard in numerous dockets approving telecommunications utilities' petitions to abandon services. The Commission has authorized CenturyLink and its affiliated companies to discontinue several services.[18] Other Oregon telecommunications utilities have also requested and received Commission approval to discontinue particular services. In each case, the Commission's orders indicate that Staff "investigated the nature of the service" the petitioner "intends to abandon, the manner and form of

[15] OAR 860-032-0020 (noting after the conclusion of the rule's text the statutes implemented by the rule).
[16] *In re a Proposed Rulemaking to Amend 860-032-0001 and 860-032-0020 to Change the Meaning of "Exempt Service" and Change the Requirements for Telecomm. Providers That Abandon or Discontinue Service in Or.*, Docket No. AR 434, Order No. 03-084 at 3-4 (Feb. 5, 2003).
[17] OAR 860-032-0020(7)(d).
[18] The approved petitions for CenturyLink and its affiliated companies include: Order No. 17-248; *In re Qwest Corp., dba CenturyLink QC; CenturyTel of Or., dba CenturyLink; CenturyTel of E. Or., dba CenturyLink; United Tel. Co. of the Nw., dba CenturyLink, Petition to Abandon the Busy Link Verification and Busy Link Interrupt Servs.*, Docket No. UM 1786, Order No. 16-363 (Sep. 27, 2016); *In re United Tel. Co. of the Nw., dba CenturyLink, Petition to Abandon its Enhanced Frame Relay Serv.*, Docket No. UM 1718, Order No. 15-158 (May 19, 2015); *In re Qwest Corp., dba CenturyLink QC, Petition to Abandon its NextConnects Feature*, Docket No. UM 1611, Order No. 12-346 (Sep. 13, 2012); *In re United Tel. Co. of the Nw. dba CenturyLink, Petition to Abandon its Talking Call Waiting Feature*, Docket No. UM 1560, Order No. 12-005 (Jan. 10, 2012); *In re Qwest Corp., Petition to Abandon its Talking Call Waiting Feature or Functionality*, Docket No. UM 1476, Order No. 10-214 (June 10, 2010); *In re Qwest Corp., Petition to Abandon, with Interim Grandfathering, Centrex Plus and CentraFlex 2 Servs.*, Docket No. UM 1291, Order No. 07-100 (Mar. 16, 2007).

notice issued" to customers, and "whether the services should be considered necessary such that they should not be abandoned."[19]

In examining whether a service proposed for discontinuation is "necessary," the Commission has examined whether customers have alternatives to the service at issue.[20] In its 2016 Order approving a request by CenturyLink to discontinue offering busy line verification and interrupt services, the Commission stated:

> The petition meets the requirement of OAR 860-032-0020(7)(d) that the petitioner: "Demonstrate that the abandonment will not deprive the public of necessary telecommunications services." That is, there are alternatives available to the busy line verification and busy line interrupt services, and therefore, they would not be deprived of "necessary telecommunications services." Further, the service is now limited in its scope of applicability on different service platforms such as cellular.[21]

The Commission reached a similar conclusion in approving Qwest's petition to abandon 1-800 Calling Service in 2017 ("there are alternatives available to the 1-800 Calling Service customers, and therefore, they would not be deprived of 'necessary telecommunications services'").[22]

The Commission's focus on the presence of substitutable competitive services is consistent with Oregon statutory standards for "determining whether telecommunications services are subject to competition or whether there are reasonably available alternatives,"[23] namely:

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[19] *In re Citizens Telecomms. Co. of Or., dba Frontier Commc'ns of Or. and Frontier Commc'ns Nw., Inc., Petition to Abandon the Busy Verification and Busy Interrupt Servs.*, Docket No. UM 1935, Order No. 18-182, Appendix A at 3 (May 23, 2018).

[20] Neither the Commission's rules nor Oregon statutes provides a definition for "necessary" telecommunications service. For purposes of implementing statutory universal service standards (*see* ORS 759.425), the Commission's rules include a definition of "basic telephone service" (*see* OAR 860-032-0190), but neither the statutes nor rules equates "basic" service and "necessary" service.

[21] Order No. 16-363, Appendix A at 6.

[22] Order No. 17-248, Appendix A at 2. The Commission used the same formulation of the standard in approving United Telephone's petition to discontinue offering Frame Relay service. Order No. 15-158, Appendix A at 3-4 ("[T]here are alternatives available to the Frame Relay Service customers, and therefore, they would not be deprived of 'necessary telecommunications services.'").

[23] ORS 759.020(5).

(a) The extent to which services are available from alternative providers in the relevant market.
(b) The extent to which the services of alternative providers are functionally equivalent or substitutable at comparable rates, terms and conditions.
(c) Existing economic or regulatory barriers to entry.
(d) Any other factors deemed relevant by the commission.[24]

The focus on available and substitutable services also tracks with the definition of "Protected Customer" in CenturyLink's Price Plan. As noted above, the Protected Customer definition applies to "residential local service customers in Oregon who, at their residences, have access to only CenturyLink copper-based wireline service and commercial satellite services to make voice calls[.]"[25]

The federal rules on discontinuance of service are based on similar legal standards. The Federal Communications Commission's ("FCC") rules provide that "[t]he FCC will normally authorize … proposed discontinuance of service … unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected."[26]

The Commission's orders on abandonment petitions also include findings that the discontinuation of a service will not affect "other telecommunications providers."[27] As required by OAR 860-032-0020(9)(a), CenturyLink is providing notice to all telecommunications providers that utilize the services CenturyLink proposes to abandon as an element of the providers' wholesale services offered in the Merrill Exchange. CenturyLink does not anticipate adverse

[24] *Id.*, subsections (a) – (d).
[25] Order No. 24-113, Appendix A at 1.
[26] 47 C.F.R. § 63.71(a)(5)(i) (2026).
[27] *See*, *e.g.*, Order No. 17-248, Appendix A at 3.

impacts on other providers from the discontinuation of the intrastate retail services that are the subject of this Application.

The Commission's abandonment of service rule requires that the applicant include in its public notifications the "[i]dentification of geographic areas where the services will be abandoned."[28] The rule thus contemplates authorization of discontinuations of services that are limited to specific geographic areas within Oregon, such as the Merrill Exchange that is the subject of this Application.

C. Request to Relinquish ETC and ETP Designations for the Merrill Exchange

The Commission's designation of telecommunications carriers as ETCs and ETPs authorizes their participation in federal and state universal service and Lifeline programs. As the Commission has summarized it:

> [FCC] regulations require that an ETC offer Lifeline services to qualifying low-income customers within its designated service area. In order to offer Lifeline services in Oregon a carrier must be designated as an ETP to participate in the [Oregon Telephone Assistance Program ("OTAP")], which is the state-mandated counterpart of the FCC Lifeline program.[29]

The Commission originally designated Incumbent Local Exchange Carriers ("ILECs") operating in Oregon as ETCs in 1997.[30]

Federal law establishes the requirements for a request by a carrier to relinquish ETC designation. As the Commission noted in a 2025 Order:

> Currently, there are no Oregon-specific requirements for ETC relinquishment beyond the federal requirements, nor are there any specific Oregon Administrative Rules that govern ETP relinquishment. However, because ETP status requires

[28] OAR 860-032-0020(5)(d).
[29] *In re CenturyLink Commc'ns, LLC, Petition for Designation as an Eligible Commc'ns Carrier and Eligible Telecomms. Provider*, Docket No. UM 2160, Order No. 21-181, Appendix A at 3 (June 3, 2021).
[30] *In re Applications to be Designated Eligible Telecomms. Carriers in the State of Or.*, Docket No. 873, Order No. 97-481 at 2 (Dec. 16, 1997).

> active federal ETC status, relinquishment of ETC designation effectively terminates ETP designation as well.[31]

In the same Order, the Commission summarized the federal requirements as follows:

> General ETC and Lifeline requirements are reflected in [FCC] regulations, 47 CFR Part 54. Specific federal requirements for ETC relinquishment are prescribed in both 47 USC §214(e)(4) and 47 § CFR 54.205(a) and are similar in each case. Federal law requires an ETC to provide advance notice of relinquishment to the state commission that granted its ETC designation. After receiving such notice, the state commission shall grant an ETC to relinquish its designation if there will be at least one ETC remaining in the area and all customers of the relinquishing carrier can obtain service from the remaining ETC(s). If this condition cannot be met, the state commission shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining ETC(s).[32]

CenturyLink files this Application as its "advance notice to the State commission" that it "seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier."[33] The FCC's rule requires that an ETC's request for relinquishment shall be granted if: (1) there is more than one ETC serving the area where CenturyLink seeks relinquishment; (2) the customers served by CenturyLink in the relinquished area will continue to be served by an ETC; and (3) to the extent that additional facilities are required to serve any of CenturyLink's customers in the area, sufficient notice shall be provided to ensure that the construction or purchase of adequate facilities can be timely completed by the remaining ETCs.[34] In Section V. below, CenturyLink provides support for the Commission's findings necessary to satisfy the requirements of the FCC's rule.

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[31] *In re U. S. Cellular Corp., Application for Designation as an Eligible Telecomms. Carrier Pursuant to the Telecomms. Act of 1996*, Docket No. UM 1084, Order No. 25-276, Appendix A at 2 (July 22, 2025).
[32] *Id.*
[33] 47 U.S.C. § 214(e)(4).
[34] The standards for Commission approval are detailed in 47 C.F.R.§ 54.205.

IV. APPROVAL OF CENTURYLINK'S APPLICATION TO UNALLOCATE TERRITORY AND DISCONTINUE SERVICES "WILL NOT DEPRIVE THE PUBLIC OF NECESSARY TELECOMMUNICATIONS SERVICES" AND IS CONSISTENT WITH THE PUBLIC INTEREST

CenturyLink's Application is limited to requests applicable to the Merrill Exchange. CenturyLink seeks an order revising prior orders allocating the Merrill Exchange to CenturyLink (or, in the alternative, for waiver of COLR obligations in the Merrill Exchange) and for authority to discontinue offering intrastate single party residential and business exchange access services and associated features, as described in CenturyLink's Basic Exchange Access Service tariffs.

Looking beyond the question of COLR obligations, the Application demonstrates "that the abandonment will not deprive the public of necessary telecommunications services"[35] for four reasons.

A. Residents of the Merrill Exchange Have Numerous Adequate Alternatives for Intrastate Single Line Voice Communications Services.

Within the Merrill Exchange, there are approximately 885 broadband serviceable locations ("BSLs"), which roughly equates to (but slightly understates) the number of *potential* customer locations for CenturyLink's local exchange services. The number is understated because a multi-dwelling unit ("MDU") counts as a single BSL regardless of how many individual living units are within the MDU. Of the 885 BSLs within the Merrill Exchange, CenturyLink serves only 110 local exchange customers. It is telling that, of 885 potential customer locations in the exchange, CenturyLink has only 110 local exchange subscribers. The overwhelming majority of Merrill Exchange customers satisfy their communications needs utilizing other providers and other technologies. And, very likely, each of the 110 local exchange customers remaining on the network

[35] OAR 860-032-0020(7)(d).

also subscribe to mobile wireless, broadband and other services in addition to CenturyLink's landline service. And, as demonstrated in Attachment F, each of those 110 local subscribers have multiple additional technologies, and even more providers, available to serve them.[36]

More specifically, each customer has access to 4G mobile wireless service from AT&T, Verizon, and T-Mobile. Of the 110 customers: 40 have access to fiber to the home internet service from Cal-Ore Communications; and 19 customers have access to cable service from FireServe. All 110 customers also have access to fixed wireless service from one or more of the following: Cal-Ore Communications, FireServe, AT&T, Verizon, and T-Mobile. Finally, all 110 customers have access to commercial satellite service from Starlink, HughesNet, and Viasat, Inc. Confidential Table 1 disaggregates these options by customer segment. Note that "consumer" and "residential" categories both are comprised of only residential customers.

Table 1: Service Options by Customer Category

[BEGIN CONFIDENTIAL]

Row Labels	Total Customers	Mobile 4G Coverage	Fiber Coverage	Cable Coverage	Fixed Wireless Coverage	Satellite Coverage
[redacted]						

[END CONFIDENTIAL]

[36] The analysis in Attachment F demonstrates general availability of alternative services in the geographic area of the Merrill Exchange, based on publicly available information. Attachment F at 1.

Further, each existing customer has *multiple* alternative options at their location. Analysis prepared by CenturyLink shows that the 110 customers in the Merrill Exchange have between four and 10 alternatives excluding satellite, and between seven and 13 alternatives including satellite. Whether or not the Commission considers commercial satellite as a viable alternative, as the FCC now does,[37] each customer has numerous alternatives to CenturyLink's local exchange services, as summarized in Table 2:

Table 2: Competitive Alternatives Available to Merrill Customers

Number of Alt. Providers (incl. Sattellite)	
Alternative Providers	Customers
7	18
8	27
9	22
10	16
11	26
13	1
Grand Total	110

Number of Alt. Providers (excl. Sattellite)	
Alternative Providers (No Sat)	Customers
4	18
5	27
6	22
7	16
8	26
10	1
Grand Total	110

B. CenturyLink's Intrastate Single Line Services are not "Necessary" to Customers in the Merrill Exchange Due to Technological Developments in Wireless and Broadband Services.

Beyond any doubt, customers have moved beyond circuit-switched, copper-based local telephony services. For example, the U.S. Centers for Disease Control reports that only 1.5 percent

[37] *In re Reducing Barriers to Network Improvements and Serv. Changes,* WC Docket No. 25-209, Report and Order, FCC 26-19 ¶ 9 (Mar. 27, 2026).

of Oregon adults use only landline services, whereas 91 percent of Oregon adults use exclusively (81.3 percent) or mostly (9.7 percent) wireless services.[38] The overwhelming majority of Merrill residents have "cut the cord," as evidenced by the fact that CenturyLink serves only 12.4 percent of customer locations in the Merrill Exchange. Moreover, each remaining CenturyLink local exchange customer has access to multiple alternative services from other providers. While some customers may prefer to retain a landline connection, such preference does not equate to *necessity* when they have available multiple, technologically superior alternatives. Customers have moved away from circuit-switched services as other communications technologies and the services they provide have become predominant. As the FCC stated in an order issued earlier in 2026:

> While voice service remains an important method of communication that originally was available only over copper-based networks, that service is now available via a multitude of transmission mediums, including fiber, wireless, and satellite. And other modes of communications that have since developed, such as video, text, and email, have become just as vital. The availability of telehealth services, remote learning, more robust disability access services, and global economic competitiveness in this increasingly interconnected world have expanded opportunities to communities and populations that previously might have been left behind. The 19th century technology of copper-based networks capable of provisioning basic voice service and limited data bandwidth is no longer sufficient to meet the bandwidth-hungry needs of modern communications and thus has been rendered obsolete by more advanced networks.[39]

If the Commission unallocates the Merrill Exchange and authorizes the discontinuation of services proposed in this Application, CenturyLink plans to offer customers in the Merrill exchange the option to subscribe to CenturyLink Connected Voice with Air-Line™ ("AirLine Service"), which provides voice service similar to the services being discontinued. AirLine Service

[38] National Center for Health Statistics, National Health Interview Survey Early Release Program, Wireless Status for Adults Aged 18 & Over (released June 2025) (available at: https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202506.pdf)
[39] FCC 26-19 ¶ 9 (footnotes omitted).

offers features associated with intrastate single party residential lines and single party business lines, including unlimited local calling, voicemail, call waiting, and CallerID. It is price comparable to residential basic exchange service and includes features and unlimited long distance.

C. CenturyLink's Intrastate Single Line Services Service Offerings are Used by a Rapidly Diminishing Share of Residents in the Merrill Exchange.

As Merrill customers have substituted newer technologies for legacy copper exchange services, CenturyLink's access line totals in the Merrill Exchanges have plummeted. Between December 2014 (which is as far back as its billing records can be located) to July 2026, CenturyLink's access line subscriber base in Merrill dropped by 81 percent from 586 to just 110. During the same time, the population of Merrill has grown by over 5 percent.[40]

CenturyLink's access line loss has been consistent and dramatic and reflects that customers throughout the exchange have voted with their feet. Given this precipitous decline, there is no reason for the Commission to require CenturyLink to continue providing a service, as if it were a monopoly service, that the overwhelming majority of local residents have themselves already abandoned.

D. CenturyLink's Requested Abandonment of Services Will Not Adversely Affect Other Telecommunications Providers Operating in the Merrill Exchange.

According to CenturyLink's records, there is only one other wholesale CLEC line in the Merrill Exchange that uses services provided by CenturyLink. This CLEC has been notified of the proposed discontinuance pursuant to CenturyLink's wholesale notification processes. A copy of

[40] *See* https://worldpopulationreview.com/us-cities/oregon/merrill (Merrill, OR population statistics).

that notification is provided as Confidential Attachment D. Abandonment will not adversely affect other telecommunications providers in the Merrill Exchange.

V. CENTURYLINK'S APPLICATION MEETS THE STANDARDS FOR RELINQUISHMENT OF ETC AND ETP DESIGNATIONS IN THE MERRILL EXCHANGE

The FCC's rule requires that an ETC seeking relinquishment shall be granted if: (1) there is more than one ETC serving the area where CenturyLink seeks relinquishment; (2) the customers served by CenturyLink in the relinquished area will continue to be served by an ETC; and (3) to the extent that additional facilities are required to serve any of CenturyLink's customers in the area, sufficient notice shall be provided to ensure that the construction or purchase of adequate facilities can be timely completed by the remaining ETCs.[41] CenturyLink's Application complies with federal and Oregon standards for ETC relinquishment.

A. Other ETC/ETP Carriers Serve the Merrill Exchange.

As of the date of this filing, the Merrill Exchange is served by Competitive Provider ETCs ("CETCs") Access Wireless *and* Hunter Communications & Technologies, LLC.[42]

B. Customers in the Merrill Exchange Will Continue to be Served by an ETC.

The FCC's relinquishment rule requires state commissions to ensure ETCs remaining in an area where an ETC relinquishes its designation are able to provide the requisite services.[43] CenturyLink has no basis to believe that the CETCs serving the Merrill Exchange will discontinue

[41] The standards for Commission approval are detailed in 47 C.F.R.§ 54.205.

[42] The Universal Service Administrative Company ("USAC") tracks ETCs by zip code (available at: https://opendata.usac.org/Lifeline/Lifeline-Companies-Near-Me-Tool/c23k-jw3b).

[43] 47 C.F.R. § 54.205(b) provides: "Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the state commission shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier."

universal service offerings in the Merrill Exchange. Given the number of CETCs available to serve Merrill Exchange customers, CenturyLink does not expect additional time will be needed for existing CETCs to purchase or construct new facilities to serve the area.

C. CenturyLink Will Provide Sufficient Notice to Affected Customers.

As noted above, there are "no Oregon-specific requirements for ETC relinquishment beyond the federal requirements, nor are there any specific Oregon Administrative Rules that govern ETP relinquishment."[44] In prior relinquishment proceedings, the Commission has highlighted that federal requirements for ETC relinquishment "do not address potential effect on customers, such as adequate notice periods."[45] The Commission has sought to fill that gap by requiring relinquishing carriers to provide multiple, structured notices to affected customers.[46]

CenturyLink's relinquishment of its ETC and ETP designations will occur in conjunction with its discontinuance of services in the Merrill Exchange. As discussed below, CenturyLink will provide notices of the discontinuance of residential and business local exchanges services as required by OAR 860-032-0020. CenturyLink will collaborate with Staff to create a structured plan for notices specific to the ETC/ETP relinquishment.

[44] Order No. 25-276, Appendix A at 2.
[45] *In re Assurance Wireless USA LP, fka Virgin Mobile USA, Notice of Relinquishment of Eligible Telecomms. Carrier and Eligible Telecomms. Provider Designations*, Docket No. UM 1522, Order No. 21-495, Appendix A at 3 (Dec. 29, 2021).
[46] *See id.* (Staff's recommendation, adopted by the Commission, requiring four text messages to customers, starting 60 days before the date of relinquishment, and a mailed letter 45 days before relinquishment); Order No. 25-276, Appendix A at 3 (notice requirements and additional conditions to address transition between carriers due to an acquisition transaction); *In re Boomerang Wireless, LLC dba Entouch Wireless, Request to Modify Ord. No. 22-155,* Order No. 22-328, Appendix A at 3-6 (Sep. 8, 2022) (structured notice requirements and conditions to ensure the accuracy and effectiveness of customer notices).

VI. INFORMATION REQUIRED BY OAR 860-032-0020(5)-(7) REGARDING ABANDONMENT OF SERVICES.

CenturyLink requests an order finding that the proposed abandonment of service meets the standards articulated in OAR 860-032-0020. The following sets forth the notifications and other information required by OAR 860-032-0020(5)-(7) to support an application by a telecommunications utility for abandonment of a regulated service for which there are current customers. In this section, CenturyLink reproduces the applicable requirements from the Commission's rule (in **bold**) and provides information demonstrating compliance with each requirement.

A. OAR 860-032-0020(5)

(5) Notifications required by this rule shall include the following at a minimum:

(a) Name of the exiting provider:

CenturyTel of Oregon, Inc. d/b/a CenturyLink

(b) Address and telephone number where the public, customers, Commission staff, and affected telecommunications providers may contact the exiting provider for information regarding the abandonment:

CenturyLink provides a copy of its notices to its customers in the Merrill Exchange as Attachment C to this Application. The notices provide an address and telephone number where the public and customers may contact CenturyLink with general questions about its requested abandonment of service.

(c) Description of telecommunications services to be abandoned.

The services to be abandoned are intrastate single party residential and business exchange access services and associated features, as defined in CenturyLink's Oregon Basic Exchange Access

Service tariff, offered to customers located in the Merrill, Oregon, local telecommunications service exchange.

(d) Identification of geographic areas where the services will be abandoned.

The services to be abandoned are limited to those provided in the Merrill, Oregon Exchange. CenturyLink provides a map of the Merrill Exchange as Attachment A to this Application.

(e) Date the service(s) will be abandoned.

CenturyLink proposes to abandon service on or after February 17, 2027 (90 days after the filing of this Application).

(f) If applicable, a statement whether customers of the services(s) to be abandoned will be converted to different service(s) offered by the exiting provider, and if so, what customers must do to be converted to the different service(s).

CenturyLink will not automatically convert customers to different services it offers. Customers will be free to choose from other providers of voice services, including landline competitors, wireless providers, or broadband providers offering voice services. CenturyLink will notify customers that they are eligible to subscribe to AirLine Service,[47] which provides voice service similar to the services being discontinued. CenturyLink's customer notices provided as Attachment C to this Application include information for Merrill Exchange customers regarding the AirLine service offering as well as a contact number to discuss other services available at each customer's location. As discussed above, AirLine Service offers features associated with intrastate single party residential lines and single party business lines, including unlimited local and long distance calling, voicemail, call waiting, and CallerID. A customer in the Merrill Exchange may keep their existing landline service phone number if they subscribe to AirLine service.

[47] A description of AirLine service can be found on the CenturyLink website at the following address: https://www.centurylink.com/home/help/home-phone/connected-voice/lte-home-phone.html.

(g) If applicable, a statement that all customers will be automatically transferred to a specified receiving provider unless they disconnect or obtain service from another provider. The exiting provider must identify the receiving provider to which customers will be transferred.

Not applicable.

(h) If the exiting provider intends to transfer customers to a specified receiving competitive provider and the receiving competitive provider will not accept all customers, a statement that customers may or will lose their service unless they obtain services from a provider of their choice. The exiting provider must provide a reasonable means for each customer to determine whether he or she will be accepted by the receiving competitive provider.

Not applicable.

(i) If applicable, a statement that service will be abandoned and that customers must obtain the service(s) to be abandoned from another provider.

If this Application is granted, CenturyLink will, if needed, assist its local voice service customers in the Merrill Exchange in the process of transferring their services to the provider of their choice. The customer notices CenturyLink provides as Attachment C to this Application explain that Merrill Exchange customers must obtain residential and business landline telephone service they now receive from CenturyLink from another provider.

(j) An explanation of how customers may receive a refund of payments or deposits for service they will not receive because of the abandonment.

When customers end their local voice residential or business services from CenturyLink, CenturyLink will calculate the return of deposits, or any other payments to which the departing customers are entitled. The calculation and payment of these amounts, and communications with customers about them, will follow CenturyLink's standard practices for circumstances where customers terminate service with CenturyLink.

(k) An electronic document containing the notice in a format suitable for posting on the Commission website. The Commission will post such notification within two business days of receipt from the exiting carrier.

See Attachment C: Notices provided in PDF format for electronic posting on the Commission's website.

B. OAR 860-032-0020(6)

(6) In addition to other notifications required by this rule, the following notifications are also required at the same time the exiting provider files notice with the Commission. Notifications here required shall include the information required by section (5) of this rule plus the information specified in subsections (6)(a) or (6)(b) of this rule.

> **(a) An exiting provider that intends to abandon any service which allows access to the emergency 9-1-1 reporting system shall:**
>
> > **(A) Mail notification to Oregon Emergency Management, which notification shall include the number of customers affected by the proposed abandonment of service.**

CenturyLink provides a copy of the required letter to the Oregon Department of Emergency Management in Attachment B to this Application.

> > **(B) Provide access to its customer records in the Enhanced 9-1-1 database(s), so that other telecommunications providers can update those customer records.**

In its letter to Intrado, referenced in the following subsection and provided in Attachment B to this Application, CenturyLink requests that after discontinuance of service in the Merrill Exchange is approved that Intrado is authorized to allow access by other telecommunications providers to any remaining Enhanced 9-1-1 database records related to the Merrill Exchange belonging to CenturyLink.

> > **(C) Send a letter to the appropriate Enhanced 9-1-1 database provider(s), with copies to the incumbent local exchange carrier(s), the Commission and Oregon Emergency Management, authorizing the Enhanced 9-1-1 database provider(s) to allow access by other telecommunications providers to any remaining Enhanced 9-1-1 database records belonging to the exiting provider, after the exiting provider has abandoned the service.**

CenturyLink provides a copy of the required letter to Intrado in Attachment B to this Application.

(b) An exiting provider that intends to abandon service so that it will no longer use a central office code or a thousands block of numbers (i.e., an NXX or an NXX-X) shall notify the North American Numbering Plan Administrator and the national administrator of the Local Exchange Routing Guide.

Not applicable**.**

C. OAR 860-032-0020(7)

(7) A telecommunications utility that intends to abandon any regulated service, whether throughout its service territory or in limited geographic areas, for which there are current customers, shall:

(a) Petition the Commission for authority to abandon the service. The petition shall be filed at least 90 days before the telecommunications utility intends to abandon the service. If the Commission does not deny the petition or set it for hearing within 90 days after receiving the petition, it shall be deemed approved.

This Application is CenturyLink's petition for authority to abandon services. CenturyLink's petition is filed at least 90 days before CenturyLink plans to abandon the local exchange voice services identified in this Application in the Merrill Exchange.

(b) Mail a notification to each affected customer and to each telecommunication provider affected by the proposed abandonment at the same time it files the petition with the Commission. The notification shall include the information required by section (5) of this rule. In addition, the notification shall include a statement that upon request from affected customers or providers the Commission may, but is not required to, deny the petition or set it for hearing:

See Attachment C for CenturyLink's customer notices sent by direct mail on November 18, 2026.

(c) File with the Commission a copy of the notification at the same time it mails the notification and files the petition. In addition, the telecommunications utility shall inform the Commission of the number of customers and the number of other providers affected by the proposed abandonment.

See Attachment C for CenturyLink's customer notices sent by direct mail on November 18, 2026.

As of the date of filing this Application, CenturyLink has 88 single party residential line and 22 single party business line customers in the Merrill Exchange who would be affected by the

proposed abandonment. CenturyLink has identified one other wholesale telecommunications provider who serves customers in the Merrill Exchange utilizing CenturyLink facilities.

> **(d) Demonstrate that the abandonment will not deprive the public of necessary telecommunications services. The telecommunications utility shall reinstate service at the Commission's request to prevent the public from being deprived of necessary services.**

CenturyLink's demonstration that "the abandonment will not deprive the public of necessary telecommunications services" is provided in detail in Section III of this Application.

> **(e) Obtain Commission approval before transferring customers to other telecommunications providers. If the telecommunications utility seeks such approval, it shall include in the petition to abandon service a request for approval to automatically transfer customers.**

CenturyLink does not intend to automatically transfer customers to other telecommunications providers but will assist (if needed) to transfer customers to other providers selected by customers in the Merrill Exchange. If customers terminate their CenturyLink service and use unregulated wireless or broadband services as substitutes, there will be no need for CenturyLink to "transfer" those customers to another provider after they terminate service with CenturyLink.

VII. CONCLUSION

For the foregoing reasons, CenturyLink respectfully requests that the Commission approve its Application to: (1) revise its allocated territory by unallocating from CenturyLink's territory the Merrill Exchange, or, alternatively, waive COLR obligations in the Merrill Exchange; (2) discontinue providing intrastate single party residential and business exchange access services and associated features, as defined in CenturyLink's Oregon Basic Exchange Access Service tariff, offered to customers in the Merrill Exchange; and (3) relinquish its ETC and ETP status in the Merrill Exchange.

Respectfully submitted this 19th day of November 2026.



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Attorneys for CenturyTel of Oregon, Inc. d/b/a CenturyLink

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

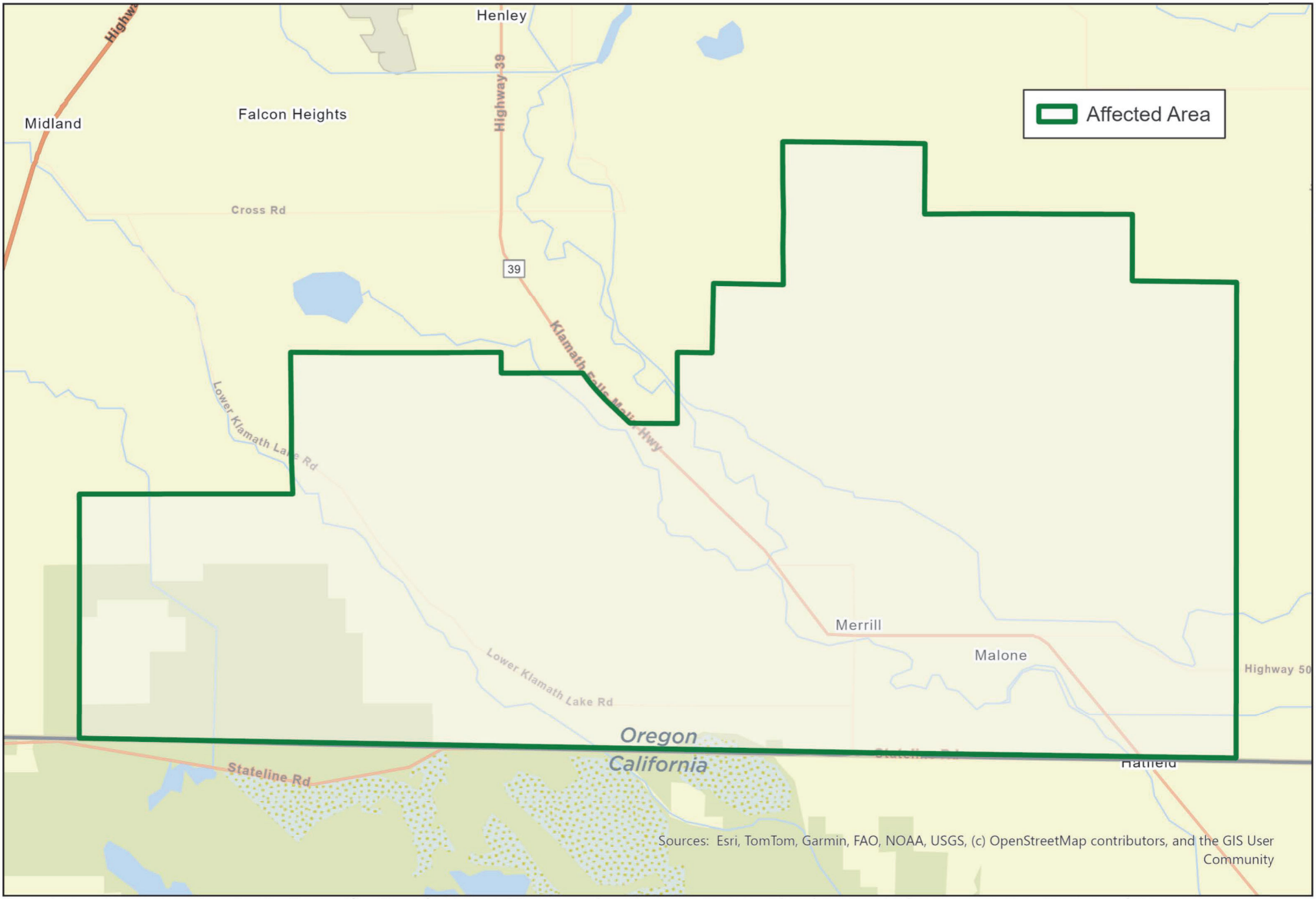
UM 2475

Attachment A

Exchange Map of the Merrill Exchange

November 2026

CenturyLink® Merrill, Oregon, Exchange Map



Boundaries shown are approximate. For verification of unique addresses or locations, contact your local CenturyLink representative. Portions of this map are ©TomTom and portions are ©2026 Lumen Technologies, Inc.

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2475

Attachment B

Letters to Oregon Department of Emergency Management and Intrado Regarding Emergency 9-1-1 Service Transition in the Merrill Exchange

November 2026

November 17, 2026

SUPPLEMENTAL NOTICE

TO: Oregon Department of Emergency Management

CenturyLink is sending this letter in conjunction with its application to the Public Utility Commission of Oregon ("PUC") for approval to discontinue offering residential and business landline local exchange and internet services currently offered in the Merrill, Oregon Exchange. A map showing the geographic area of the Merrill Exchange is attached. This letter is sent in compliance with OAR 860-032-0020(6)(A)(c).

CenturyLink expects that its termination of landline residential and business telephone services will affect all of its current customers in the Merrill Exchange. As of the date of this Notice, CenturyLink has 110 landline local exchange service customers in the Merrill Exchange (88 single party residential line customers and 22 single line business service customers).

Beginning on **February 17,** 2027, or as soon after that date as authorized by the Federal Communications Commission and the Public Utility Commission of Oregon, CenturyLink plans to discontinue landline telephone services in the Merrill Exchange. CenturyLink also plans to terminate internet service delivered over the same copper cables where we plan to discontinue landline telephone service.

Current CenturyLink customers in the Merrill exchange have been advised that they will need to seek service from alternative service providers. CenturyLink will not be automatically transferring current customers to designated new providers.

General questions regarding this notice may be directed to 833-225-7885 or can be addressed to CenturyLink, Attn: Regulatory Legal, 931 14th St., Denver, Colorado 80202.

Sincerely,

/s/ Marianne Topar
Marianne Topar
Customer Engagement Advocate
911 ID, OR, TX, WA

Branson, MO 65653
Desk: 763-575-7605
Marianne.topar@lumen.com

November 17, 2026

SUPPLEMENTAL NOTICE

TO: Intrado (c/o Kim Hegg)

CenturyLink is sending this letter in conjunction with its application to the Public Utility Commission of Oregon ("PUC") for approval to discontinue offering residential and business landline local exchange and internet services currently offered in the Merrill, Oregon Exchange. A map showing the geographic area of the Merrill Exchange is attached.

This letter is sent in compliance with OAR 860-032-0020(6)(a)(A), with copies provided to the PUC and to the Oregon Department of Emergency Management.

CenturyLink expects that its termination of landline residential and business telephone services will affect all of its current customers in the Merrill Exchange. As of the date of this Notice, CenturyLink has 110 landline local exchange service customers in the Merrill Exchange (88 single party residential line customers and 22 single line business service customers).

Beginning on **February 17**, 2027, or as soon after that date as authorized by the Federal Communications Commission and the Public Utility Commission of Oregon, CenturyLink plans to discontinue landline telephone services in the Merrill Exchange. CenturyLink also plans to terminate internet service delivered over the same copper cables where we plan to discontinue landline telephone service.

Current CenturyLink customers in the Merrill exchange have been advised that they will need to seek service from alternative service providers. CenturyLink will not be automatically transferring current customers to designated new providers.

After CenturyLink's application receives regulatory approvals and CenturyLink has abandoned services in the Merrill Exchange, CenturyLink authorizes Intrado to allow access by other telecommunications providers to any remaining Enhanced 9-1-1 database records belonging to CenturyLink.

Branson, MO 65653
Desk: 763-575-7605
Marianne.topar@lumen.com

General questions regarding this notice may be directed to 833-225-7885 or can be addressed to CenturyLink, Attn: Regulatory Legal, 931 14th St., Denver, Colorado 80202.

Sincerely,

/s/ Marianne Topar
Marianne Topar
Customer Engagement Advocate
911 ID, OR, TX, WA

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

Attachment C

CenturyLink's Customer Notices Sent by Direct Mail
On November 18, 2026

November 2026

CenturyLink®
100 CenturyLink Drive
Monroe, Louisiana 71203

November 18, 2026

[redacted]

Changes are Coming to CenturyLink® Services In Your Area

Dear [redacted],

Please be advised that CenturyLink intends to cease legacy voice (landline telephone) and internet services we offer in the Merrill, Oregon wire center. A map of the impacted geographic area is attached. Below is important information regarding what you need to do and by when.

Discontinuance of Legacy Voice Services
Beginning on **February 17, 2027**, or as soon after that date as authorized by the Federal Communications Commission and the Public Utility Commission of Oregon, CenturyLink plans to discontinue legacy voice services in your area. To ensure uninterrupted phone service, you must choose between two alternate options:

- **Stay with CenturyLink:** CenturyLink® Connected Voice with Air-Line™, our new digital voice service that provides an experience very similar to your current landline, but with upgraded technology, is now available in your area. The service offers crystal-clear call quality and essential features like unlimited local calling, voicemail, call waiting, and caller ID. To switch to Connected Voice with Air-Line, call CenturyLink at **855-433-0838** Monday through Friday, 6:00 a.m. – 5:00 p.m. PT. The rates, terms and conditions of Connected Voice with Air-Line will differ from your current service.
- **Move to Another Provider:** Alternate options in your area also may include voice service from providers of fixed wireless, 4G LTE mobile wireless, voice over internet protocol (VoIP) digital phone service, cable telephony, and/or broadband fiber. If you would like help with exploring your options, please contact our partners Clearlink and Infinity Sales Group by calling **833-873-7535** Monday through Sunday, 6:00 a.m. – 8:00 p.m. PT.

Choosing voice service from CenturyLink or another provider will allow you to keep your same phone number.

Cancellation of Internet Service
CenturyLink also plans to terminate internet service delivered over the same copper cables where we plan to discontinue landline telephone service. Therefore, if you receive internet service from CenturyLink, this letter serves as a cancellation notice for your CenturyLink internet service. This means you will need to choose a new internet service provider before **February 17, 2027,**

to avoid disruption to your internet service. If you would like to cancel your CenturyLink internet service now, please call **855-433-0838**, Monday through Friday 6:00 a.m. – 5:00 p.m. PT.

There are other providers with internet service available at your address. If you would like help with exploring your options, please contact our partners Clearlink and Infinity Sales Group by calling **833-873-7535** Monday through Sunday, 6:00 a.m. – 8:00 p.m. PT.

Details to Keep in Mind

- **You are urged to act by February 2, 2027**. We strongly encourage you to act well in advance of the February 17, 2027, legacy voice service anticipated discontinuance date and internet service cancellation date. This will account for time to transition to CenturyLink® Connected Voice with Air-Line™ or another provider for voice service, and another provider for internet service (where applicable), thereby helping to ensure your phone and/or internet service(s) is/are not interrupted and that you do not lose your current phone number.
- **Customer contracts will not be renewed.** If you have a contract for your service(s), it will not be renewed.
- **Deposits.** CenturyLink is not currently holding any customer deposits for the affected accounts. Please call **855-433-0838** with any questions relating to a deposit.
- **No early termination fees.** If you choose to cancel your CenturyLink service(s) before February 17, 2027, or your service(s) is/are under contract and you cancel prior to expiration of the contract term, you will not be charged any early termination fees.

CenturyLink must file a petition with the Public Utility Commission of Oregon (OPUC) in connection with this notice. Upon request from affected customers, the Commission may, but is not required to, deny the petition or set it for hearing. The OPUC will consider CenturyLink's petition in docket UM 2475.

We recognize that these changes may generate questions, and we are here to assist. If you are a current CenturyLink customer and have questions regarding this notice, existing service arrangements, or applicable timing, please contact your account team directly (where applicable) or call CenturyLink at **855-433-0838**. We urge you to act by **February 2, 2027**, to avoid having your service(s) interrupted.

General questions regarding this notice may be directed to 833-225-7885 or can be addressed to CenturyLink, Attn: Regulatory Legal, 931 14th St., Denver, Colorado 80202.

Sincerely,

CenturyLink
CenturyTel of Oregon, Inc. d/b/a CenturyLink

The following statements are required by FCC rules and pertain only to the proposed discontinuance of voice service:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of CenturyTel of Oregon, Inc. d/b/a CenturyLink to Discontinue a Telecommunications Service. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

You may also object to or comment on the planned discontinuance by filing electronically through the FCC's Electronic Comment Filing System in WC Docket No. 26-214. It is recommended that any such filing include either a copy of this notice, or information sufficient to permit Wireline Competition Bureau staff to identify the relevant discontinuance application, such as: it is the application of CenturyTel of Oregon, Inc. d/b/a CenturyLink; the location(s) at which service is/are being discontinued; the date of the notice you received; and the date on which the carrier intends to discontinue service. For further information, the FCC has consumer guides "Tech Transition: Modernizing Communications Services," which may be found at https://www.fcc.gov/tech-transitions, and "When Your Telephone Company Discontinues Service," which may be found at https://www.fcc.gov/notice.

Important Information Regarding Connected Voice with Air-Line, VoIP and/or Mobile Wireless Voice Services

Lack of Line Power. Services like Connected Voice with Air-Line, VoIP and mobile wireless voice service do not provide line power needed to keep these services operational during an electrical power outage. This means that the service will not work in the event of a power outage unless you have a battery backup. To maintain phone service during these times, you will have to arrange for an alternative source of electrical power.

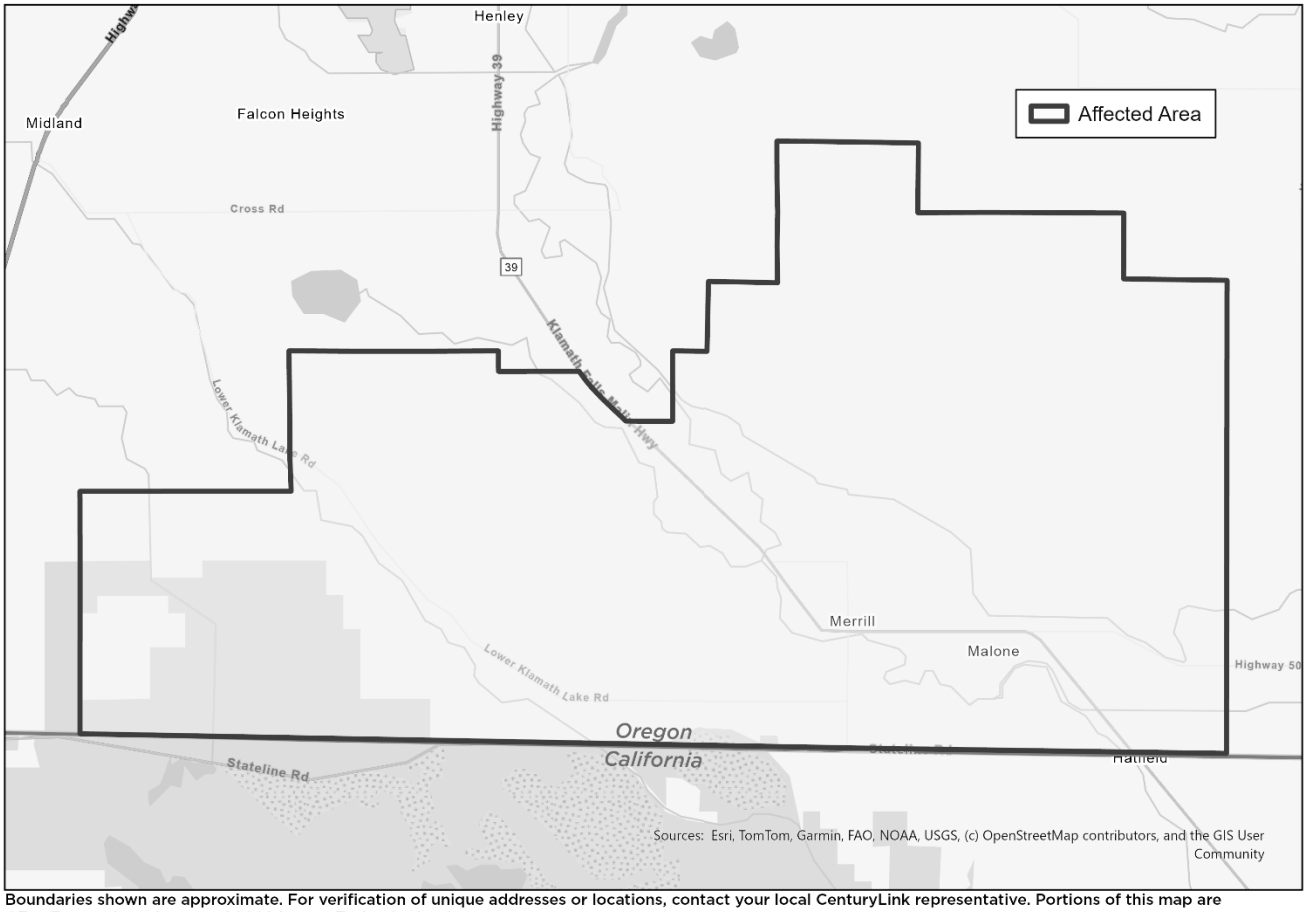
Security Responsibilities and Other Steps You May Take to Ensure Safe Use of Connected Voice with Air-Line, VoIP, or Mobile Wireless Service. As noted above, in the event of an electrical power outage, Connected Voice with Air-Line, VoIP, and mobile wireless service will not operate without backup power, such as an external battery backup. Without sufficient power, you won't be able to place or receive any calls, including emergency 911 calls.

Mobile wireless voice service is not associated with one fixed location or address, meaning that if you make an emergency 911 call with your mobile phone, you should provide the emergency operator the location of your emergency and your wireless phone number, so if the call gets

disconnected, the operator can call you back. Additional information related to reaching 911 service using mobile wireless voice service is available on the FCC's website: https://www.fcc.gov/consumers/guides/wireless-911-service.

If you plan to move, and need to change your service address, you will need to contact your service provider to ensure that 911 calls are properly routed. Connected Voice with Air-Line customers should not move the Air-Line adapter to another location without first contacting CenturyLink.

CenturyLink® Merrill, Oregon Affected Area



Boundaries shown are approximate. For verification of unique addresses or locations, contact your local CenturyLink representative. Portions of this map are ©TomTom and portions are ©2026 Lumen Technologies, Inc.

CenturyLink® Connected Voice with Air-Line™

Keep your number. Keep your home phone. Keep life simple.

CenturyLink® is bringing a **next-generation home phone service** to your area. Connected Voice with Air-Line™ combines the reliability customers expect with the simplicity they need. Keep your current phone number, continue using your existing home phone, and enjoy familiar calling features and 911 access. By moving beyond aging copper infrastructure, Connected Voice with Air-Line helps deliver a more dependable connection and peace of mind for everyday communication.

Reliability
Connected Voice with Air-Line™ provides a dependable home phone connection without relying on traditional copper telephone lines. Instead, it uses modern technology, helping keep customers connected even if telephone lines are damaged by weather, theft, or vandalism.

For added peace of mind, an optional backup battery is available for a one-time charge. The battery provides at least 24 hours of standby time and up to 8 hours of talk time, helping customers stay connected during power outages and emergencies.

Emergency Access
Connected Voice with Air-Line provides access to 911 services. Note: During a power outage, 911 access requires a backup power source. Keep your service address current for emergency response.

Affordable and Budget-Friendly
Connected Voice with Air-Line offers a total monthly cost comparable to traditional landline service, with no separate internet plan required. It's an affordable option for customers who want a reliable home phone service, including seniors, fixed-income households, and those without internet access.

Same Great Features
You get to keep your same phone number and phone. You'll hear a familiar dial-tone and enjoy many of the calling features you use today, including:

- Caller ID, Call Waiting, Voicemail, and Anonymous Call Blocking
- Unlimited U.S. long-distance calling, 500 international calling minutes to select countries
- No monthly equipment lease fee

Connected Voice with Air-Line may be compatible with certain devices, such as medical alert systems, security systems, fax machines, and other equipment. Device compatibility may vary. Contact your device provider to confirm VoIP compatibility and test all critical services after installation.

Simple to Install and Easy to Switch.
Stay with CenturyLink and continue service with a provider you know and trust. Installation is simple. Just plug the device into a power outlet and connect your existing phone. In some cases, modifications to your inside wiring will be necessary to use existing wall jacks.

Switch to Connected Voice with Air-Line™ Today!

To switch to Connected Voice with Air-Line, call CenturyLink customer service at **1-866-963-6665,** or visit https://www.centurylink.com/home/voip-solutions/air-line.html

Services are not available everywhere. CenturyLink may change or cancel products and services or substitute similar products and services at its sole discretion without notice.
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November 18, 2026

CenturyLink®
100 CenturyLink Drive
Monroe, Louisiana 71203

[redacted]

Changes are Coming to CenturyLink® Services In Your Area

Dear [redacted],

Please be advised that CenturyLink intends to cease legacy voice (landline telephone) and internet services we offer in the Merrill, Oregon wire center. A map of the impacted geographic area is attached. Below is important information regarding what you need to do and by when.

Discontinuance of Legacy Voice Services
Beginning on **February 17, 2027**, or as soon after that date as authorized by the Federal Communications Commission and the Public Utility Commission of Oregon, CenturyLink plans to discontinue legacy voice services in your area. To ensure uninterrupted phone service, please contact your new provider of choice directly. Alternate options in your area may include voice service from providers of fixed wireless, 4G LTE mobile wireless, voice over internet protocol (VoIP) digital phone service, cable telephony, and/or broadband fiber.

Cancellation of Internet Service
CenturyLink also plans to terminate internet service delivered over the same copper cables where we plan to discontinue landline telephone service. Therefore, if you receive internet service from CenturyLink, this letter serves as a cancellation notice for your CenturyLink internet service. To avoid disruption to your internet service, you need to choose a new internet service provider before **February 17, 2027**.

Details to Keep in Mind

- **You are urged to act by February 2, 2027**. We strongly encourage you to act well in advance of the February 17, 2027, legacy voice service anticipated discontinuance date and internet service cancellation date. This will account for time to transition to another provider for voice (and internet, where applicable) service(s), thereby helping to ensure your phone (and internet, where applicable) service(s) is/are not interrupted and that you do not lose your current phone number.
- **Customer contracts remain supported**. Customers currently subscribing to CenturyLink legacy voice (and internet, where applicable) service(s) under existing

contracts will continue to be supported until the expiration of the applicable service term pursuant to contract.

- **Customer contracts will not be renewed.** If you have a contract for your service(s), it will not be renewed.
- **Deposits.** CenturyLink is not currently holding any customer deposits for the affected accounts. Please call **866-396-3597** with any questions relating to a deposit.
- **No early termination fees.** If you choose to cancel your CenturyLink service(s) before February 17, 2027, or your service(s) is/are under contract and you cancel prior to expiration of the contract term, you will not be charged any early termination fees.

CenturyLink must file a petition with the Public Utility Commission of Oregon (OPUC) in connection with this notice. Upon request from affected customers, the Commission may, but is not required to, deny the petition or set it for hearing. The OPUC will consider CenturyLink's petition in docket UM 2475.

We recognize that these changes may generate questions, and we are here to assist.

- If you are a current CenturyLink customer and have questions regarding this notice, existing service arrangements, or applicable timing, please contact your account team directly or call CenturyLink at **866-396-3597**.
- If you are a wholesale or federal customer, please contact your account representative directly.
- General questions regarding this notice may be directed to 833-225-7885 or can be addressed to CenturyLink, Attn: Regulatory Legal, 931 14th St., Denver, Colorado 80202.

We urge you to act by **February 2, 2027**, to avoid having your service(s) interrupted.

Sincerely,

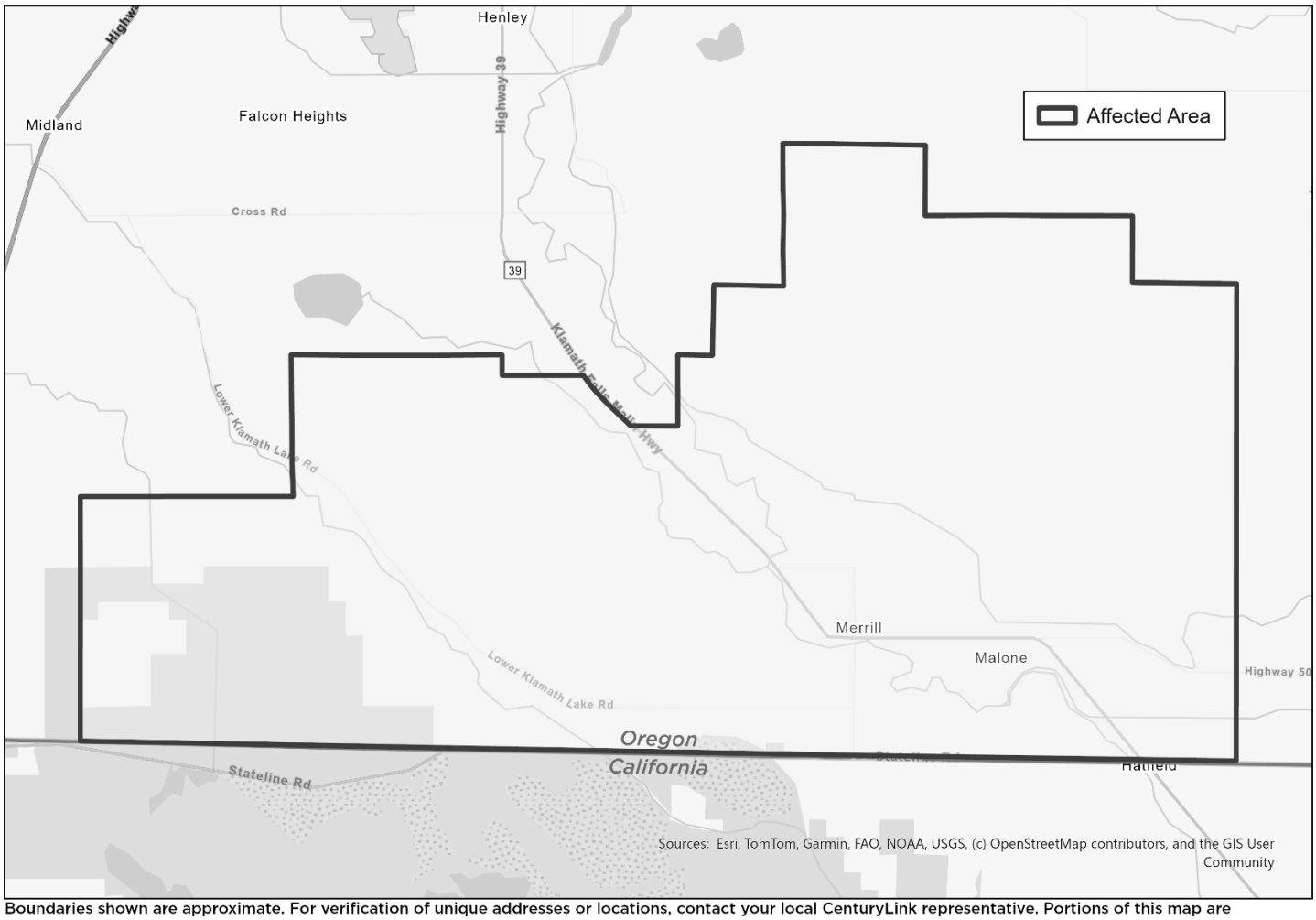
CenturyLink
CenturyTel of Oregon, Inc. d/b/a CenturyLink

The following statements are required by FCC rules and pertain only to the proposed discontinuance of voice service:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of CenturyTel of Oregon, Inc. d/b/a CenturyLink to Discontinue a Telecommunications Service. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

You may also object to or comment on the planned discontinuance by filing electronically through the FCC's Electronic Comment Filing System in WC Docket No. 26-214. It is recommended that any such filing include either a copy of this notice, or information sufficient to permit Wireline Competition Bureau staff to identify the relevant discontinuance application, such as: it is the application of CenturyTel of Oregon, Inc. d/b/a CenturyLink; the location(s) at which service is/are being discontinued; the date of the notice you received; and the date on which the carrier intends to discontinue service. For further information, the FCC has consumer guides "Tech Transition: Modernizing Communications Services," which may be found at https://www.fcc.gov/tech-transitions, and "When Your Telephone Company Discontinues Service," which may be found at https://www.fcc.gov/notice.

CenturyLink® Merrill, Oregon Affected Area



Boundaries shown are approximate. For verification of unique addresses or locations, contact your local CenturyLink representative. Portions of this map are ©TomTom and portions are ©2026 Lumen Technologies, Inc.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

REDACTED

Attachment D

CenturyLink's Notice of Discontinuance of Service to Wholesale Competitive Local Exchange Carrier

November 2026

REDACTED

November 19, 2026

Internal Qwest Contact

120 Lenora St, 11th Floor
Seattle , WA 98121
testmail@centurylink.com

TO: Internal Qwest Contact

CLEC Notice – All Events

Important notice about CenturyLink service offering(s)

Reseller of CenturyLink TDM copper service

CenturyLink is filing with both the Oregon Public Utility Commission and the Federal Communications Commission applications to discontinue providing local voice service in the Merrill, Oregon Exchange. If approved by state and federal regulators, CenturyLink will no longer provide service over copper facilities in the Merrill Exchange.

As such, we are providing this 90-day notice to inform affected customers that these facilities will need to be terminated within 90 days of receipt of this letter.

Please see the attached list of addresses and loops affected by this event.

If you have any questions about the local voice service discontinuance in this area, please contact your account executive for further information.

LOOP	CUSTOMER NAME	SERVICE ADDRESS	ACCOUNT #	WIRE CENTER CLLI	WIRE CENTER NAME
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Sincerely,

Qwest Corporation dba CenturyLink QC

Note: To view your Centurylink Wholesale notifications online, please log into our ANR (Accessible Notices Repository) at : https://notices.centurylink.com.

If you would like to subscribe, unsubscribe or change your current profile to CenturyLink Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at: http://www.centurylink.com/wholesale/notices/cnla/maillist.html

cc: < SalesManagerName >
< VoiceTraderName >
< ServiceManagerName >

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

REDACTED

Attachment E

Matrix of CenturyLink Customer Locations in the Merrill Exchange

November 2026

Alternative Provider Methodology and Limitations:

Alternative provider availability in this analysis is based on **National Broadband Map data as of December 2025**. Results represent reported broadband availability reflected in that data vintage and may not reflect subsequent changes in provider coverage or service availability.

For purposes of this analysis, a **customer** represents one or more records in the supplied data that share the same identifying attributes, based on the fields available in the data provided. These attributes may include **WIRE_CENTER_ID, LUID, MASTER_ADDR_ID, ACCOUNT NO, SERVICE ADDRESS, and CUSTOMER NAME**. Records sharing the applicable combination of these fields are treated as a single customer for purposes of the customer counts and alternative-provider analysis.

Alternative provider counts represent **provider-technology combinations** and should not be interpreted as the number of unique provider companies. A single provider may be counted more than once when service is available through multiple technologies. For example, a provider offering both Mobile 4G and Fixed Wireless is counted twice, once for each technology. Similarly, a provider offering both Cable and Fiber is counted once under each technology. Accordingly, the number of alternative providers shown for a customer may exceed the number of unique companies offering service.

Fixed-service availability is generally evaluated using **Broadband Serviceable Locations (BSLs)**. Certain customer addresses may not correspond to a BSL, including locations such as gated-community gates, electrical substations, schools, airports, and other enterprise or non-standard locations. For these non-BSL addresses, Mobile 4G coverage may still be evaluated. Where a nearby BSL is determined to reasonably represent the customer location, that BSL may be used as a **proxy** for identifying potential alternative fixed-service providers. Use of a nearby BSL as a proxy is an analytical assumption and does not establish that an identified provider actually offers service at the specific customer address. Where an appropriate BSL proxy cannot be identified, availability of Fiber, Cable, and Fixed Wireless cannot be determined through the BSL-based analysis. **For non-BSL locations only, satellite availability is assumed for purposes of this analysis.**

REDACTED

RecordID	MANUALLY_RESEARCHED	NOTE	H3_8	Total Alternatives (Non-Satellite)	Total Alternatives	Mobile 4G Providers	MOBILE_4G	Fiber Providers	FIBER	Cable Providers	CABLE	Fixed Wireless Providers	FIXED_WIRELESS	Satellite Providers	SATELLITE	CUSTOMER_SEGMENT CUSTOMER_NAME	ACCOUNT_NO_T	CUSTOMER_TYPE	PRODUCT	MASTER ADDR_ID	ADDRESS_SERVICE	UNIT_ SERVICE	CITY_SERVICE	STATE_ SERVICE	ZIP_ SERVICE	LINES	BILLING_FULL_ADDRESS	ADDRESS_BILLING	UNIT_BILLING	CITY_BILLING	STATE_ BILLING	ZIP_BILLING	LON	LAT
1028			8B2813ab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1029			8B2813ab59fff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1027			8B2813ab5fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1031			8B2813ab1ffff	6	9	3	AT&T; T-Mobile; Verizon	1	Cal-Ore Communications, Inc.	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1005			8B2813ab73fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1021			8B2813ab77fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				Voice				MERRILL	OR	97633	1								
1036			8B2813ab1ffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Viasat Inc; Starlink				Voice				MERRILL	OR	97633	1								
1010			8B2813ab65fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1008			8B2813ab65fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
1001			8B2813aa1bfffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	Cal-Ore Communications, Inc.	3	HughesNet; Viasat Inc; Starlink				Voice				KLAMATH FALLS	OR	97603	1								
1009			8B2813ab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633	1								
5			8B2813ab1bfffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633									
14			8B2813ab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633									
17			8B2811af15fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				KLAMATH FALLS	OR	97603									
18			8B2813aa69fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	FireServe; T-Mobile; Verizon	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633									
21			8B2813ad4ffffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; T-Mobile	3	HughesNet; Viasat Inc; Starlink				VOICE				KLAMATH FALLS	OR	97603									
22			8B2811af31fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Viasat Inc; Starlink				VOICE				KLAMATH FALLS	OR	97603									
24			8B2811af49fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; T-Mobile	3	HughesNet; Viasat Inc; Starlink				VOICE				MERRILL	OR	97633									
		Found using city Malin																															
26	X		6	9	3	AT&T; T-Mobile; Verizon	0			0		3	FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
28			8B2813ab81fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
30			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
37			8B2813ab15fffff	7	10	3	AT&T; T-Mobile; Verizon	0		0		4	Cal-Ore Communications, Inc.; FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
39			8B2813ab4bfffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				KLAMATH FALLS	OR	97603									
40			8B2813ab27fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
42			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
43			8B2813ab27fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
44			8B2813af29fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	FireServe; T-Mobile	3	HughesNet; Starlink; Viasat Inc				VOICE				KLAMATH FALLS	OR	97603									
45			8B2813aab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
48			8B2813ab5ffffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
58			8B2813ab1bfffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
64			8B2813ab39fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
71			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
72			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
74			8B2813ab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
75			8B2813ab59fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
77			8B2813af29fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
78			8B2813ab67fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
		Found using city Klamath																															
86	X	Falls	7	10	3	AT&T; T-Mobile; Verizon	0			0		4	Cal-Ore Communications, Inc.; FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
88			8B2813aab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
92			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
98	X		6	9	3	AT&T; T-Mobile; Verizon	0			0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
102			8B2813ab39fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
104			8B2813ab15fffff	7	10	3	AT&T; T-Mobile; Verizon	0		0		4	Cal-Ore Communications, Inc.; FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
105			8B2813ab8ffffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
106			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
107			8B2813ab4bfffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
108			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
113			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
114			8B2813af69fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; T-Mobile	3	HughesNet; Starlink; Viasat Inc				VOICE				KLAMATH FALLS	OR	97603									
120			8B2813ab49fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE				MERRILL	OR	97633									
2			8B2813ab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
9			8B2813ab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
10			8B2813aa77fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
12			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
13			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
20			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
23			8B2813af29fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				KLAMATH FALLS	OR	97603									
27			8B2813ab39fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
29			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
31			8B2813ab47fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
32			8B2813aab69fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
33			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
35			8B2813af14fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				KLAMATH FALLS	OR	97603									
36			8B2813ab19fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
38			8B2813aab49fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
49			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
51			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
55			8B2813aab59fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
56			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
57	X		6	9	3	AT&T; T-Mobile; Verizon	0			0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
73			8B2813ab59fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
84			8B2813aab79fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	1	FireServe	2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
89			8B2813acd5fffff	6	9	3	AT&T; T-Mobile; Verizon	0		0		3	Cal-Ore Communications, Inc.; FireServe; T-Mobile	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				KLAMATH FALLS	OR	97603									
90	X		6	9	3	AT&T; T-Mobile; Verizon	0			0		3	FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
93	X		6	9	3	AT&T; T-Mobile; Verizon	0			0		3	FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
95			8B2813af15fffff	7	10	3	AT&T; T-Mobile; Verizon	0		0		4	Cal-Ore Communications, Inc.; FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
96			8B2813af11fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				KLAMATH FALLS	OR	97603									
97			8B2813aab39fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
99	X		6	9	3	AT&T; T-Mobile; Verizon	0			0		3	FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
110			8B2813ab59fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
115			8B2813ab59fffff	8	11	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		3	Cal-Ore Communications, Inc.; FireServe; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MERRILL	OR	97633									
117			8B2813ab15fffff	7	10	3	AT&T; T-Mobile; Verizon	0		0		4	Cal-Ore Communications, Inc.; FireServe; T-Mobile; Verizon	3	HughesNet; Starlink; Viasat Inc				VOICE & HSI				MALIN	OR	97632									
1034	X		10	13	3	AT&T; T-Mobile; Verizon	3	Cal-Ore Communications, Inc.; FireServe; Hunter1		FireServe	3	Cal-Ore Communications, Inc.; FireServe; T-Mobile	3	HughesNet; Viasat Inc; Starlink				Voice and HSI				MERRILL	OR	97633	1								
1032			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1039			8B2813ab19fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Viasat Inc; Starlink				Voice and HSI				MERRILL	OR	97633	1								
1038			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1033			8B2813ab59fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1017			8B2813ab65fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1022			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1000			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1024			8B2813ab1bfffff	6	9	3	AT&T; T-Mobile; Verizon	1	Cal-Ore Communications, Inc.	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1016			8B2813ab65fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1025			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1011			8B2813ab47fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1007			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1020			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1023			8B2813ab47fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1037			8B2813ab19fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1003			8B2813ab19fffff	4	7	3	AT&T; T-Mobile; Verizon	0		0		1	FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1018			8B2813aab79fffff	7	10	3	AT&T; T-Mobile; Verizon	2	Cal-Ore Communications, Inc.; FireServe	0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1019			8B2813ab59fffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1015			8B2813ab5ffffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; FireServe	3	HughesNet; Starlink; Viasat Inc				Voice and HSI				MERRILL	OR	97633	1								
1035			8B2813ab5ffffff	5	8	3	AT&T; T-Mobile; Verizon	0		0		2	Cal-Ore Communications, Inc.; F

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

Attachment F

Summary of Alternative Services Available to Merrill Exchange Customers

November 2026

Alternative Voice and Broadband Services Available in Merrill, Oregon 97633

I. Purpose and Scope

This assessment identifies the communications services available to customers in Merrill, Oregon, as alternatives to CenturyLink's copper-based or "legacy" telephone service. It addresses wireline fiber, fixed wireless, mobile wireless (commercial mobile radio service, or CMRS), and satellite services. For each provider, it documents service presence in Merrill, monthly recurring charges by data speed tier, whether data is unlimited, and whether voice service is available. Research was conducted using publicly available information accessed on October 13, 2026. Thus, availability and price of a specific service at a specific customer's service address may vary from these findings.

II. Research Methodology

- **Availability.** The analysis gives primary weight to provider service-area statements, as supplemented by third-party availability data derived from the Federal Communications Commission (FCC) Broadband Data Collection (available at: https://broadbandmap.fcc.gov/home). This analysis is offered as a supplement to the granular, address specific competition analysis provided as Attachment F to the Application.
- **Rates.** Rates were drawn from alternative providers' plan pages and FCC-mandated Broadband Facts labels where available. Secondary sources were used only where provider pages were unavailable, and are identified as such. Promotional rates are distinguished from standard rates where the provider discloses both. Where only introductory rates are disclosed, those rates are discussed with the caveat that post-introductory rates may be different.
- **Unlimited data.** A plan is characterized as unlimited only where provider terms so state. Plans subject to deprioritization or reduced speeds after a customer reaches a usage threshold are designated "Conditional."
- **Voice.** Voice availability is classified as Direct, Bundled, Cellular, Third-Party VoIP Capable, or Provider Confirmation Required. Broadband service is not characterized as voice service unless the provider itself supplies voice.
- **Counting.** Alternatives are counted both by independent provider and by provider/technology offering, so that a single provider's fiber, fixed wireless, and mobile products are not presented as independent networks.

III. Summary of Findings

Merrill is served by five independent non-satellite providers—two locally based wireline providers with fiber-to-the-home (FTTH) networks (Cal-Ore Communications and FireServe Broadband) and three national wireless carriers (AT&T, T-Mobile, and Verizon)—together with three nationwide satellite providers (Starlink, HughesNet, and Viasat).

Available fiber service ranges from $29.00 per month (FireServe, 10 Mbps) to $129.00 per month (Cal-Ore, 2.5 Gbps symmetrical), with gigabit service (1 Gbps symmetrical) offered by both fiber providers at $99.00 per month. Both fiber providers offer unlimited data. Fixed wireless service is available from $39.95 to $99.00 per month, and T-Mobile and Verizon offer 5G home internet services from $50.00 per month (or $35.00 when bundled with a mobile line), all without data caps.

IV. Provider-by-Provider Discussion

A. Cal-Ore Communications

Cal-Ore Communications is an independent, locally supported telecommunications provider serving Southern Oregon and Northern California, and it expressly identifies Merrill as part of its service

area. Cal-Ore offers fiber, Digital Subscriber Line (DSL), Next-Gen fixed wireless, and legacy fixed wireless internet, together with residential telephone service. Its residential fiber plans are priced at $59.00 (500 Mbps symmetrical), $79.00 (750 Mbps symmetrical), $99.00 (1 Gbps symmetrical), and $129.00 (2.5 Gbps symmetrical) per month, and a secondary source reports an entry tier at $39.00. Next-Gen fixed wireless plans are priced at $59.00, $79.00, and $99.00 per month for 200/20, 250/25, and 300/30 Mbps, respectively. Cal-Ore's Broadband Facts labels provided by Cal-Ore state that each plan includes unlimited data with no charge for additional usage.

Cal-Ore offers **direct residential voice service**: a Standard plan at $19.00 per month with individual calling features at $3.00 each, and an Enhanced plan at $29.00 per month that includes voicemail, caller ID, call waiting, three-way calling, call forwarding, and long-distance calling to the contiguous United States. Cal-Ore also participates in the Oregon Lifeline program.

B. FireServe Broadband (Stimulus Technologies)

FireServe is a Klamath Basin internet service provider that merged with Stimulus Technologies on August 1, 2023, and continues to operate under the FireServe Broadband name. In cooperation with the City of Merrill and Klamath County, FireServe built the Merrill Gigabit Fiber Project, a city-wide FTTH network. Its published Merrill fiber plans are $29.00 per month (10 Mbps), $49.00 per month (100 Mbps), and $99.00 per month (1 Gbps), each with unlimited data included usage and no overage charges. FireServe also offers fixed wireless service in the Klamath Basin, including Merrill, at $39.95, $59.95, and $79.95 per month for 10, 20, and 30 Mbps flat-rate plans, plus activation and installation fees of $99 to $199.

FireServe states that it provides phone service, and Stimulus Technologies offers VoIP services. However, no residential voice rate for Merrill is publicly available. FireServe's voice offering is therefore classified in the table below as **provider confirmation required**. FireServe's fiber service is fully capable of supporting a separately purchased interconnected VoIP service.

C. T-Mobile

T-Mobile offers 5G Home Internet, a fixed wireless service delivered over its cellular network. Third-party data derived from FCC filings indicate availability at approximately 53.5 percent of Merrill locations, and availability depends on network capacity at each address. Plans are priced at $50.00 (Rely), $60.00 (Amplified), and $70.00 (All-In) per month with AutoPay, or $15.00 less with a qualifying T-Mobile voice line. The plans include equipment at no charge, require no annual contract, and impose no data cap, although service is subject to data prioritization during congestion. T-Mobile also provides **cellular voice service** through its mobile plans, priced at $50.00 (Essentials Saver), $85.00 (Experience More), and $100.00 (Experience Beyond) per month for a single line. T-Mobile no longer sells its LineLink home phone adapter, but third-party VoIP service, such as Ooma at $9.99 per month, is offered to T-Mobile Home Internet customers.

D. Verizon

Verizon offers 5G Home Internet and, in areas with limited broadband, Home Internet Lite over its LTE network. Third-party data indicate availability at approximately 83 percent of Merrill locations. The 5G Home plans are priced at $50.00, $60.00, and $75.00 per month with Auto Pay for speeds of up to 100, 150, and 300 Mbps, respectively, or $35.00, $45.00, and $60.00 with a Verizon mobile plan. The plans include equipment, do not require a contract, and have no data cap. Verizon does not offer its Fios Digital Voice product outside its Fios fiber footprint. Verizon customers in Merrill may obtain **cellular voice service** through Verizon mobile plans, including Unlimited Welcome, Unlimited Plus, and Unlimited Ultimate, which carry list prices of approximately $65.00 to $105.00 per month for a single line before Auto Pay discounts of $5.00 to $10.00. Customers may also use broadband-dependent third-party VoIP service.

E. AT&T

AT&T provides **cellular voice service** with unlimited talk and text under its Value 2.0, Extra 2.0, Premium 2.0, and Elite 2.0 plans, priced at $50.00, $70.00, $90.00, and $110.00 per month for a single line, less $10.00 with qualifying AutoPay. All plans include unlimited data. However, high-speed data is limited to 5 Gbps on Value 2.0 and 100 GB on Extra 2.0, after which speeds may be slowed during network congestion. Premium 2.0 and Elite 2.0 include unlimited data. AT&T also markets AT&T Phone–Advanced, a fixed cellular home phone service with E911 location detection and 24-hour battery backup. Its availability and rate in Oregon were not verified.

F. Satellite Providers

Satellite providers offer nationwide availability, subject to capacity and a clear view of the sky. **Starlink**, a low-Earth-orbit service, offers Residential plans at $55.00, $85.00, and $130.00 per month with unlimited data, plus a $349 equipment kit or, where offered, a $10.00 monthly kit rental. Its relatively low latency supports third-party VoIP. **HughesNet**, a geostationary service, offers plans with monthly Priority Data allowances, after which speeds are reduced. It requires a minimum term and offers an optional **HughesNet Voice** service. **Viasat** offers Essentials at $39.99 per month for 12 months, then $69.99, with 150 Gbps of high-speed data; Unleashed at $69.99, then $99.99; and Unleashed Max at $109.99, then $179.99. Both Unleashed plans include unlimited high-speed data, subject to reduced priority for above-typical usage.

V. Comparative Assessment

Cal-Ore and FireServe offer fiber services that provide the highest speeds, symmetrical capacity, and unlimited data at prices that are comparable to, or lower than, many standalone wireless plans. Cal-Ore is the only non-satellite provider confirmed to offer its own residential voice service at a published rate. The three national carriers provide mobile voice service that does not depend on a fixed broadband connection, and T-Mobile and Verizon also provide uncapped fixed wireless broadband. Satellite services extend broadband and broadband-dependent VoIP to locations that terrestrial networks do not reach.

These technologies are not functionally identical to copper telephone service. Fiber-based voice, fixed wireless, and VoIP generally depend on commercial power at the customer premises and may require battery backup to maintain service, including 911 calling, during outages. Mobile service depends on indoor signal quality. VoIP 911 location information depends on an accurately registered address. Geostationary satellite latency may affect voice quality.

VI. Conclusion

Customers in Merrill, Oregon have multiple alternatives to CenturyLink copper-based telephone service: up to five independent non-satellite providers and up to eight providers including satellite. Two of these providers offer fiber-to-the-home broadband with unlimited data. Voice service is available directly from Cal-Ore, through cellular service from AT&T, T-Mobile, and Verizon, and through third-party interconnected VoIP over every broadband alternative identified. However, these conclusions apply at the community level, and availability at each specific customer address is not confirmed. When considering options, customers can use provider address-qualification tools or confirm availability directly with potential providers.

Providers, Monthly Rates, Data Terms, and Voice Availability as Alternatives to CenturyLink Copper-Based Telephone Service | Research date: October 13, 2026. Rates listed are monthly recurring charges, and do not include taxes and government fees unless otherwise noted. The "Sources" identified in the final column are detailed below the table.

Provider	Technology	Plan / Speed Tier (Down/Up)	Monthly Recurring Charge	Is Data Unlimited?	Is Voice Service Available?	Source
FIBER-TO-THE-HOME PROVIDERS						
Cal-Ore Communications Independent telecommunications provider (Cal-Ore Telephone Co. affiliate) serving Southern Oregon and Northern California	Fiber (FTTH); symmetrical	250/250 Mbps (entry tier)* 500/500 Mbps 750/750 Mbps 1 Gbps/1 Gbps 2.5 Gbps/2.5 Gbps	$39.00* $59.00 $79.00 $99.00 $129.00	**Yes.** Broadband Facts labels state Unlimited data; $0.00/GB for additional usage.	**Yes – Direct Voice.** Standard: $19/mo (features $3.00 each) Enhanced: $29/mo (feature package; long distance to contiguous U.S.) Oregon Lifeline offered.	1, 2, 3, 6, 7, 8
FireServe Broadband Klamath Basin ISP founded 1999–2000; merged with Stimulus Technologies Aug. 1, 2023	Fiber (FTTH)	10 Mbps Fiber 100 Mbps Fiber Gigabit Fiber (1,000 Mbps)	$29.00 $49.00 $99.00	**Yes.** Provider states Unlimited included usage; no overage.	**Provider confirmation required.** FireServe states it provides phone service, and Stimulus offers VoIP; no residential voice rate published. Broadband is **third-party VoIP capable**.	9, 10, 12, 8
FIXED WIRELESS / 5G HOME INTERNET PROVIDERS						
Cal-Ore Communications (See above)	Next-Gen fixed wireless; legacy fixed wireless	**Next-Gen:** 200/20 Mbps 250/25 Mbps 300/30 Mbps **Legacy FW:** 20/5 Mbps 40/10 Mbps 65/12 Mbps	$59.00 $79.00 $99.00 $59.00 $79.00 $99.00	**Yes.** Labels state Unlimited data; $0.00/GB.	**Yes – Direct Voice** (Standard $19; Enhanced $29), as above.	4, 5, 6, 7
FireServe Broadband (See above)	Fixed wireless (tower-based)	Flat-Rate 10/10 Mbps Flat-Rate 20/20 Mbps Flat-Rate 30/20 Mbps	$39.95 $59.95 $79.95	**Yes, for Flat-Rate plans** (provider distinguishes them from its metered UB100 plan).	**Provider confirmation required**; third-party VoIP capable.	9, 11
T-Mobile National wireless carrier	5G fixed wireless (Home Internet)	Rely (typ. 170–354 Mbps) Amplified (up to ~498 Mbps) All-In (up to ~498 Mbps)	$50.00 $60.00 $70.00 ($15 less with a T-Mobile voice line)	**Yes** – no data cap; subject to data prioritization during congestion.	**Not included.** Cellular voice available via T-Mobile mobile plans; third-party VoIP capable (e.g., Ooma offer $9.99/mo for T-Mobile Home Internet customers). LineLink no longer sold.	13, 14, 8, 29, 30
Verizon National wireless carrier	5G / LTE fixed wireless (5G Home; Home Internet Lite)	5G Home (up to 100 Mbps) 5G Home Plus (up to 150 Mbps) 5G Home Ultimate (up to 300 Mbps)	$50.00 $60.00 $75.00 ($35/$45/$60 with Verizon mobile plan)	**Yes** – no data cap.	**Not included.** Fios Digital Voice is not offered outside Fios areas. Cellular voice via Verizon mobile; third-party VoIP capable.	15, 16, 8
MOBILE WIRELESS PROVIDERS (CMRS)						

Provider	Technology	Plan / Speed Tier (Down/Up)	Monthly Recurring Charge	Is Data Unlimited?	Is Voice Service Available?	Source
AT&T National wireless carrier	4G LTE / 5G mobile	Value 2.0 Extra 2.0 Premium 2.0 Elite 2.0	$50.00 $70.00 $90.00 $110.00 (1 line; $10 less with AutoPay)	**Conditional.** All plans unlimited; high-speed data: 5 GB (Value), 100 GB (Extra), unlimited premium (Premium/Elite). May slow when network is busy.	**Yes – Cellular Voice.** Unlimited talk and text (U.S., Canada, Mexico). AT&T Phone–Advanced (fixed cellular home phone) availability in Oregon not verified.	17, 18, 19
T-Mobile National wireless carrier	4G LTE / 5G mobile	Essentials Saver Experience More Experience Beyond	$50.00 $85.00 $100.00 (1 line)	**Conditional.** Essentials: 50 GB premium, then deprioritized; Experience plans: unlimited premium data.	**Yes – Cellular Voice.** Unlimited talk and text.	20, 21
Verizon National wireless carrier	4G LTE / 5G mobile	Unlimited Welcome Unlimited Plus Unlimited Ultimate	$65.00 $90.00 $105.00 (1 line, list; Auto Pay saves $5–$10)	**Yes / Conditional.** Unlimited data on all plans; Welcome uses standard (deprioritized) data; Plus and Ultimate include premium data.	**Yes – Cellular Voice.** Unlimited talk and text.	22, 23
SATELLITE PROVIDERS						
Starlink SpaceX low-Earth-orbit satellite service	LEO satellite	Residential 100 Mbps Residential 200 Mbps Residential Max	$55.00 $85.00 $130.00	**Yes.** Unlimited data; lower tiers have lower network priority.	**Not included.** Third-party VoIP capable (latency approx. 25–60 ms).	24, 25
HughesNet EchoStar geostationary satellite service	GEO satellite; Fusion (satellite + wireless hybrid)	Select Elite Fusion (lower latency)	Not publicly verified – secondary sources report approx. $39.99–$119.99 depending on plan and promotion	**Conditional.** No hard cap; speeds reduced after monthly Priority Data is used.	**Yes – Bundled Voice.** HughesNet Voice optional add-on (unlimited U.S./Canada calling); rate not publicly verified.	26, 27
Viasat Geostationary satellite service	GEO satellite	Essentials Unleashed Unleashed Max	$39.99 promo / $69.99 standard $69.99 promo / $99.99 standard $109.99 promo / $179.99 standard (promo = first 12 months)	**Conditional.** Essentials: 150 GB high-speed, then standard data. Unleashed/Max: unlimited high-speed, subject to reduced priority above typical usage.	**Provider confirmation required.** Third-party VoIP possible; GEO latency may affect call quality.	28

Source List (information available as of October 13, 2026)

1. Cal-Ore Communications – Home – https://calore.net/
2. Cal-Ore – Residential Fiber Internet – https://calore.net/fiber/
3. Cal-Ore – Broadband Labels – https://calore.net/broadband-labels/
4. Cal-Ore – Next-Gen Fixed Wireless – https://calore.net/next-gen-fixed-wireless/

5. Cal-Ore – Residential Fixed Wireless – https://calore.net/fixed-wireless/
6. Cal-Ore – Residential Phone Service – https://calore.net/residential-voice/
7. InMyArea – Cal-Ore Plans & Pricing (secondary) – https://www.inmyarea.com/provider/cal-ore-communications
8. InMyArea – Merrill, OR Internet Providers (secondary) – https://www.inmyarea.com/internet/oregon/merrill
9. FireServe – Home – https://www.fireserve.com/
10. FireServe – Merrill Gigabit Fiber Project – https://www.fireserve.com/merrill/
11. FireServe – High Speed Internet – https://www.fireserve.com/internet/
12. FireServe – Joins Stimulus Technologies – https://www.fireserve.com/stimulus.php
13. T-Mobile – 5G Home Internet Plans – https://www.t-mobile.com/home-internet/plans
14. MyUtilitySearch – T-Mobile Home Internet 2026 (secondary) – https://myutilitysearch.com/t-mobile-home-internet/
15. Verizon – 5G Home Internet – https://www.verizon.com/home/internet/5g/
16. MyUtilitySearch – Verizon 5G Home Internet (secondary) – https://myutilitysearch.com/verizon-5g-home-internet/
17. AT&T – Unlimited Data Plans – https://www.att.com/plans/unlimited-data-plans/
18. Reviews.org – AT&T Unlimited Plans Explained (secondary) – https://www.reviews.org/mobile/att-unlimited-plans-explained/
19. AT&T – AT&T Phone–Advanced – https://www.att.com/home-phone/phone-advanced/
20. T-Mobile – Cell Phone Plans – https://www.t-mobile.com/cell-phone-plans
21. ShopCellPlans – T-Mobile Plans 2026 (secondary) – https://shopcellplans.com/t-mobile-plans/
22. Verizon – myPlan (Broadband Facts) – https://www.verizon.com/plans/unlimited/myplan
23. CableTV.com – Verizon Mobile Plans 2026 (secondary) – https://www.cabletv.com/verizon/wireless
24. Starlink – Service Plans – https://starlink.com/service-plans
25. BudgetSeniors – Starlink Residential Plans 2026 (secondary) – https://www.budgetseniors.com/starlink/starlink-residential-plans/
26. HughesNet – Consumer Plans & Pricing – https://www.hughesnet.com/consumer-plans-pricing
27. EZ Internet – HughesNet Plans 2026 (secondary) – https://ezinternet.services/providers/hughesnet/
28. Viasat – Satellite Internet Plans – https://www.viasat.com/satellite-internet/plans/
29. T-Mobile Support – LineLink – https://www.t-mobile.com/support/coverage/t-mobile-linelink
30. Ooma – T-Mobile Home Internet and Phone Offer – https://www.ooma.com/t-mobile-internet-with-home-phone/

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

Attachment G

Declaration of Peter J. Gose, CenturyLink Senior Director of Regulatory Affairs

November 2026

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2475

In the Matter of CENTURYTEL OF OREGON, INC. Application to Revise Allocated Service Territory or Waive Carrier of Last Resort Obligations, Abandon Certain Exchange Access Services, and Relinquish ETC and ETP Designations in the Merrill, Oregon Exchange	DECLARATION OF PETER J. GOSE

I, PETER J. GOSE, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Peter J. Gose. I am employed by CenturyTel of Oregon, Inc. ("CenturyLink"), as Regulatory Affairs Director.

2. I have reviewed the "Application of CenturyLink to Revise Allocated Service Territory or Waive Carrier of Last Resort Obligations, Abandon Certain Exchange Access Services, and Relinquish ETC and ETP Designations in the Merrill, Oregon Exchange," filed by CenturyLink in docket UM 2475 at the Oregon Public Utility Commission (the "Application").

3. The Application includes factual representations regarding the number of CenturyLink customers in the Merrill Exchange and the presence of competitive alternatives for residents of the Merrill Exchange. I have reviewed the Application and have knowledge of the facts underlying those representations. The facts included in the Application are true and accurate to the best of my knowledge.

4. I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THAT IT IS MADE FOR USE AS EVIDENCE BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON AND IS SUBJECT TO PENALTY FOR PERJURY.

Signed this 18th day of November 2026



Peter J. Gose