**ITEM NO. CA22**

**PUBLIC UTILITY COMMISSION OF OREGON**
**STAFF REPORT**
**PUBLIC MEETING DATE: October 20, 2020**

**REGULAR ____ CONSENT X EFFECTIVE DATE November 1, 2020**

**DATE:** October 1, 2020

**TO:** Public Utility Commission

**FROM:** Malia Brock

**THROUGH:** Bryan Conway, Michael Dougherty, and Bruce Hellebuyck **SIGNED**

**SUBJECT:** UNITED TELEPHONE COMPANY OF THE NORTHWEST:
(Docket No. ADV 1176/Advice No. 20-06)
Adds tariff language pursuant to 47 CFR §9.16(b)(1) and (2), pertaining to Kari's Law.

## STAFF RECOMMENDATION:

Staff recommends that the filed tariff be allowed to go into effect for service on or after November 1, 2020.

## DISCUSSION:

### Issue

Whether to allow the revised tariff filed by United Telephone Company of the Northwest (United) to go into effect with service on and after November 1, 2020.

### Applicable Law

Telecommunications utilities are required under ORS 759.175 to submit tariff filings to the Commission whenever they intend to change their rates, terms, or conditions of service. On September 28, 2018, with Order No. 18-359, the Commission approved a Price Plan applicable to Qwest and its affiliate, United, as allowed by ORS 759.255.

United is regulated under a Price Plan pursuant to ORS 759.255 and Order No. 18-359 in Docket No. UM 1908. Section (8)(a)(i) of the Price Plan requires tariff changes to be filed at least thirty days prior to their effective dates, and Section (8)(b) provides customer notice requirements of price increases and changes to the terms or conditions

of service. Requirements in (8(b) state that United will provide 30-day notice to customers subscribing to the service, including business customers under contract or with term commitments.

Analysis

United originally filed on August 19, 2020, to propose the following revisions to its PUC No. 4 Tariff, 4th Revision, Index Page 1, Section 8, 1st Revised Page 2, Section 8, 1st Revised Page 3 and Section 8, Original Page 5.

On September 9, 2020, United filed an amendment to extend the original requested effective of September 23, 2020 until November 1, 2020, in order to provide all of its customers with the 30-day notice requirement of the Price Plan.

This filing adds language pursuant to 47 CFR §9.16(b)(1) and (2), pertaining to Kari's Law. Specifically, these revisions add language related to requirements that equipment manufactured after February 16, 2020 be configured to allow callers to dial "911" directly without first dialing an access code. Where applicable, features or calling options that allow configurations that require an access code before reaching the telephone company's network must not be configured as such for 911 calls.

Kari's Law is named in honor of Kari Hunt, who was killed by her estranged husband in a motel room in Marshall, Texas in 2013. Ms. Hunt's 9-year-old daughter tried to call 911 for help four times from the motel room phone, but the call never went through because she did not know that the motel's phone system required dialing "9" for an outbound line before dialing 911.

Congress responded by enacting Kari's Law in 2018. Kari's Law requires direct 911 dialing and notification capabilities in multi-line telephone systems (MLTS), which are typically found in enterprises such as office buildings, campuses, and hotels. The statute provides that these requirements take effect on February 16, 2020, two years after the enactment date of Kari's Law. In addition, Kari's Law and the federal rules implementing regulations apply only with respect to MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020. This filing is consistent with federal requirements.

Conclusion

Staff finds that the filing complies with the requirements of the Price Plan and Oregon statutes.

**PROPOSED COMMISSION MOTION:**

Allow United Advice No. 20-06 to go into effect for service rendered on and after November 1, 2020.

United.20-06.Kari'sLaw