OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE

DATE: December 9, 2015

TO: File through Bryan Conway and Bruce Hellebuyck

FROM: Jim Stanage

SUBJECT: CenturyTel of Oregon, Docket No. PL 30/Advice No. 15-011-PL
Deletes the Convenience Fee Charge from the company's tariff.

I have reviewed this filing and recommend that an acknowledgement letter be sent. The filing went into effect on November 22, 2015, and was filed on November 20, 2015. CenturyTel of Oregon (CenturyTel) proposes to delete the Convenience Fee Charge that is assessed by the company when customers complete one-time payments with the assistance of a live company representative.

The company would be having a third-party contractor providing the same service as what is currently provided under the company's price list and, initially, it would be provided at a lower charge---i.e., $3.95 instead of $5.00. *Moreover, the other existing payment methods offered by the company, which are all free of charge, would continue to be available and all of them are substantially similar services.* The company offers the following non-chargeable payment options: payment by mailed check, electronic payment by check, auto-payment plans, and an automated payment system via telephone. Also, credit or debit card payments made through the company's retail locations are not subject to a fee.

The abandonment of service rule, OAR 860-32-0020(3)(b), allows a telecommunications utility to abandon a service without, first, successfully petitioning the Commission: "When a telecommunications provider replaces a telecommunications service with a substantially similar service..." That is, the abandonment of service rule states that the rule does not apply if the utility in question offers a service that is substantially similar to the service that is being discontinued.

Therefore, staff believes that the company can abandon the Convenience Fee Charge without the need to petition the Commission and without notifying their customers. Notification is not necessary because OAR 860-32-0020(3) states that the rule does not apply if any of the three conditions stated in (3) are met---i.e., condition (b) is met, hence, notification is not required.

Nevertheless, the company states: "Customers have been notified by bill message of this change and will also be notified of the charges that will be assessed by the third party vendor prior to the completion of a payment transaction."

The filing was submitted on November 20, 2015, and thus, complies with CenturyTel *Price Plan*, Section P, which requires price list changes to be filed at least one day prior to their effective dates and requires that, "(f)or services provided on a per-call basis, the company will give reasonable notice to customers of the price prior to the customer's use of the service." Staff believes that it is a fair description of the Convenience Fee notice provided in customers' billing statements to consider the situation to constitute "reasonable notice to customers." Telecommunications utilities are required under ORS 759.175 to submit filings to the Commission whenever they intend to change their rates, terms, or conditions of service.