ITEM NO. RA2

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: January 9, 2024

REGULAR X CONSENT ____ EFFECTIVE DATE N/A

DATE: December 1, 2023

TO: Public Utility Commission

FROM: Russ Beitzel, Joseph Bartholomew

THROUGH: Bryan Conway and Marc Hellman **SIGNED**

SUBJECT: LUMEN dba CENTURYLINK:[1]
(Docket No. UM 1908/UM 2206)
PUC Determination of CenturyLink's Compliance with Commission Orders Related to September 2 and 3, 2023 Outages

STAFF RECOMMENDATION:

Staff recommends the Commission find CenturyLink (Lumen or Company) Company in compliance with applicable Public Utility Commission or Oregon (Commission) Orders related to the September 2 and 3, 2023, outages.

DISCUSSION:

Issue

Whether Lumen complied with applicable orders during the September 2 and 3, 2023, outages; and whether the Company should be required to take additional actions to ensure customer safety.

Applicable Rule or Law

A telecommunications utility is obligated to afford safe and adequate services. Under ORS 759.506(1), a telecommunications utility with allocated territory is obligated to "[p]rovide adequate and safe service to the customers of this state."

[1] Formerly known as Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of Oregon, and CenturyTel of Eastern Oregon.

OAR 860-023-0005 provides: “Each energy utility, large telecommunications utility, and intrastate toll service provider must have and maintain its entire plant and system in such condition that it will furnish safe, adequate, and reasonably continuous service.”

Under ORS 756.040(1), the Commission’s general powers and duties include the obligation to obtain for the customer of telecommunications utility “adequate service at fair and reasonable rates.” To this end, “[t]he commission is vested with power and jurisdiction to supervise and regulate every public utility and telecommunications utility in this state, and to do all things necessary and convenient in the exercise of such power and jurisdiction.” ORS 756.040(2).

Order No. 22-340, as modified by Order No. 22-422 and affirmed in Order No.23-109, requires the utility to address all tickets and make repairs to the within 48 hours of the creation of the ticket. The Order additionally requires the Company to provide a customer support line to the customers in the Jacksonville/Little Applegate area which allows reporting of service issues for multiple addresses.

Order No. 23-356 required Lumen to perform a post incident assessment addressing questions from Staff and Citizens’ Utility Board (CUB) as well as responding to an intervenor proposal.

Analysis

Background
On December 14, 2021, at the Oregon Public Utility Commission Public Meeting, the Commission adopted Staff’s recommendation in Docket No. UM 2206 under Order No. 21-470 to open an investigation into the reliability of telephone services provided by CenturyLink for Jacksonville, Oregon and surrounding areas, the health risk raised by the quality of service. UM 2206 was latter consolidated with UM 1908. Staff received numerous complaints in the UM 1908 docket regarding an outage impacting customers in the Little Applegate/Jacksonville area. Because of the history of service quality issues and role of landlines in protecting health and safety of the community, Staff was compelled to investigate these complaints further to ensure compliance with applicable Commission orders.

At the September 21, 2023, Public Meeting, Staff recommended that the Company be required to submit an after-incident assessment addressing. As described in Order No. 23-356, the Company’s report must address the following: 1) Staff’s questions about how the Company responded to the September 3 and September 4 outages; 2) a

description and supporting documentation demonstrating how the Company complied with each requirement of Order Nos. 22-340 and 22-422 related to the September 2 and September 3 outages; and 3) a response to Priscilla Weaver's proposal regarding a Jackson-area outage triage process made at the September 21 public meeting. Copies of Staff's recommendation and CUB/Ms. Weaver's comments are attached as Attachments A and B to this memo. The Company filed the compliance report on October 23, 2023.

After Incident Report
The Company's report covers all aspects of Order 23-356 as detailed below. Staff's analysis confirms that the Company complied with all applicable requirements when addressing the September 2 and September 3, 2023, outages.

Compliance with Order Nos. 22-340 and 22-422
In the Company's report it showed compliance with all aspects of Order Nos. 22-340 and 22-422. The information related to the 48-hour repair time is included in the required bi-weekly report filing provided by the Company. The required bi-weekly report shows whether a ticket is resolved within the 48-hour requirement. Staff agrees that all non-force majeure repairs have been made within 48 hours. Additionally, the required dedicated line has been in operation since September 28, 2022.

The Company admitted to having training issues with the dedicated line where some call center representatives were not allowing Jacksonville area customers to report multiple address outages, but a ticket was still immediately issued, and the first outage was resolved within 8 hours. The Company also stated that it has changed its training for call center representatives and rerouted the Jacksonville calls to a smaller group of trained representatives. In a response comment to the Company's compliance filing, customer Priscilla Weaver stated in regard to an October 27, 2023, outage, "Once he confirmed I had no dial tone, he created my trouble ticket. He also created tickets for several of my neighbors who I had learned also were out."

Response to Ms. Weaver's Proposal
During the Public Meeting Ms. Weaver provided proposals for the Company to improve the call processing method for the Company. The Company responded to Ms. Weaver's suggestions by stating, "While the Company will not be able to implement all of Ms. Weaver's ideas, her concerns were shared with CenturyLink's contact call center management, and her comments helped to inform improvements recently made. The primary reason Ms. Weaver's suggestions cannot be fully implemented is that they rely on an organizational structure that does not exist at the Company and cannot be practically implemented for this one small subset of customers." As noted by Staff above, it does appear that the training and changes made by the Company have

already been implemented and realized by Ms. Weaver, related to taking multiple addresses for an outage.

Responses to Staff's Questions
Related to Staff's questions about the outages, the Company provided information for each question as detailed:

Q. Were customers allowed to report an outage for multiple addresses to the dedicated support line? If not, what caused the issue?
A. In general yes, but there were a few instances where training or inexperience was identified as an issue. The Company has taken the previously mentioned steps to improve its process.

Q. Were customers communicated with on a timeline and in a manner consistent with Lumen policies?
A. The Company's policies for communicating outages are generally related to social media posts for situations that affect greater than 1,000 customers, or if greater than 25 social media messages have been received by the Company. As neither of the outages met those guidelines and the first outage was resolved within 8 hours, no immediate message was supplied to the public. After the second outage was determined to be more severe and discussion with Staff, the Company posted information on social media that was commented on.

Q. What challenges were experienced in attempting to disseminate outage information to customers? How can these challenges be addressed or overcome?
A. The Company stated it followed internal guidelines, but is open to discussion for future situations.

Conclusion

In the detailed post incident filing, the Company showed compliance with the main aspect of Order Nos. 22-340 and 22-422, provided corrective action for the minor non-compliance, responded to Ms. Weaver's proposal as required in Order No. 23-356, and answered Staff's questions. Since the Company adequately demonstrated compliance with all applicable obligations, Staff does not recommend any additional action regarding these outages.

PROPOSED COMMISSION MOTION:

Find Lumen in compliance related to the September 2 and 3, 2023, outages.

Lumen UM 1908/UM 2206 – September Outages Compliance Report

ITEM NO. RA3

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 21, 2023

REGULAR X **CONSENT** ____ **EFFECTIVE DATE** _____

DATE: September 18, 2023

TO: Public Utility Commission

FROM: Russ Beitzel, Joseph Bartholomew, and Melissa Nottingham **SIGNED**

THROUGH: Bryan Conway and Marc Hellman

SUBJECT: LUMEN dba CENTURYLINK:
(Docket No. UM 1908/UM 2206)
Report on Recent Outages in Jacksonville and recommended PUC action

STAFF RECOMMENDATION:

Staff recommends the Commission direct CenturyLink[1] to provide a post-incident assessment by October 21, 2023.

DISCUSSION:

Issue

Whether Lumen complied with applicable orders during the September 2nd and 3rd outages, and whether the Company should be required to take additional actions to ensure customer safety.

Applicable Rule or Law

A telecommunications utility is obligated to afford safe and adequate services. Under ORS 759.506(1), a telecommunications utility with allocated territory is obligated to "[p]rovide adequate and safe service to the customers of this state."

[1] Formerly known as Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of Oregon, and CenturyTel of Eastern Oregon.

OAR 860-023-0005 provides: “Each energy utility, large telecommunications utility, and intrastate toll service provider must have and maintain its entire plant and system in such condition that it will furnish safe, adequate, and reasonably continuous service.”

Under ORS 756.040(1), the Commission’s general powers and duties include the obligation to obtain for the customer of telecommunications utility “adequate service at fair and reasonable rates.” To this end, “[t]he commission is vested with power and jurisdiction to supervise and regulate every public utility and telecommunications utility in this state, and to do all things necessary and convenient in the exercise of such power and jurisdiction.” ORS 756.040(2).

Order No. 22-340, as modified by Order No. 22-422 and affirmed in Order No.23-109, requires the utility to address all tickets and make repairs to the within 48 hours of the creation of the ticket. The Order additionally requires the Company to provide a customer support line to the customers in the Jacksonville/Little Applegate area which allows reporting of service issues for multiple addresses.

Analysis

Background

On December 14, 2021, at the Oregon Public Utility Commission Public Meeting, the Commission adopted Staff’s recommendation in Docket No. UM 2206 under Order No. 21-470 to open an investigation into the un-reliable telephone services provided by CenturyLink for Jacksonville, Oregon and surrounding areas. UM 2206 was latter consolidated with UM 1908. Staff received numerous complaints in the UM 1908 docket regarding an outage impacting customers in the Little Applegate/Jacksonville area. Because of the history of service quality issues and role of landlines in protecting health and safety of the community, Staff was compelled to investigate these complaints further to ensure compliance with applicable Commission orders.

September Assessment

On Saturday, September 2, 2023, Staff and Consumer Services began receiving multiple emails from customers residing in the Little Applegate area of Jacksonville. Customers reported an outage beginning on September 2, and a subsequent outage on September 3. Customers whose service was restored after the September 2nd outage

were again without telephone service. Order No. 22-340,[2] requires the company to allow customers to report multiple outages, and Lumen must address each outage ticket within 48 hours.[3]

Customers had several complaints including commitment times provided by the company exceeding 48 hours and customers being unable to report multiple outage tickets for neighbors when contacting the dedicated phone line. Customers reported that Lumen employees were not aware of any other outages in the area, could not explain the extended commitment dates, and were unaware the September 3 outage was due to catastrophic damage to equipment.

Attachment A provides redacted summary of the customer complaints received by Consumer Services. The table demonstrates when the outage began, the commitment date provided by Lumen, the restoration date, if the customer attempted to report multiple outages, and if the company was aware of an outage in the area. If the customer did not provide the information to Consumer Services, it is marked as unknown. If the customer was part of both outages, a semi-colon differentiates between the September 2 and September outages. Consumer Services began working with Lumen to address these complaints as they were received.

On September 6, 2023, Lumen, and Staff met to discuss the outages that occurred starting September 2, 2023. Staff received information on two separate outages occurring on September 2, 2023, and the September 3, 2023, respectively.

September Outages
The first outage began the afternoon of September 2, 2023, and was reported by a customer directly to a Lumen repair technician. The technician began troubleshooting the issue and narrowed the cause to out of balance Terminal (T1) spans in the Jacksonville central office. The technician contacted Lumen's switching surveillance group, and attempted to remotely restore the T1 spans. The remote restoration was not successful, and the technician manually reset the T1 spans, and service was restored around 8:00 pm, September 2, 2023.

The September 3, 2023 outage was the result of vehicle accident near the intersection of Oregon Hwy 238 and Pair-A-Dice Ranch Road west of Jacksonville. The vehicle struck and destroyed a telecom cabinet.[4] The cabinet houses feeder cables from the central office to the customers on Upper and Little Applegate Road and surrounding

[2] *See e.g.*, UM 1908, Priscilla Weaver's Comments, S.S. Comments, J.S. Comments, K.W.H. Comments, Sept. 2-7, 2023.
[3] *See e.g.*, UM 1908, C.B. Comments, H.D & A.D. Comments, C.F. Comments, Sept. 2-7, 2023.
[4] See photos of damage in Attachment B.

areas. Technicians first isolated the T1 span cables and placed temporary splices for those circuits. The next step was to identify working pairs and begin splicing operations of working circuits on the cables damaged by the vehicle. A new cabinet was installed and the work of making permanent repairs to the temporary splices was completed. Due to the extent of the damage and the complexity of the repairs, intermittent service disruptions were unavoidable as temporary splices were removed and cut over to the permanent fix.

On Wednesday afternoon, September 6, 2023, Lumen's corporate communications posted information regarding the outages on Twitter/X and Facebook. As of Thursday, September 7, 2023, Lumen's local field operations group reported that all customers were restored and repairs complete.

On September 8, 2023, Consumer Services was notified by a customer in the area, the telephone service was not restored on the 7th and remained out of service. A new outage ticket was issued on the 8th at 1:50 pm with a commitment date of September 13th. The customer reported the telephone service, to his knowledge, was not operational since September 2, 2023. On September 11, 2023, Lumen investigated the customer's outage and reported the "system was busy at the switch." Although a technician was dispatched to the customer's home, ultimately, the issue was resolved by a technician at the Central Office. The customer reported the phone service was operational on September 11th at 2:22pm.

Only the September 3 outage persisted for over 48 hours. Under OAR 860-023-0055(h), uncontrollable events, including negligent or willful misconduct by third parties, constitute "Force Majeure."[5] Staff does not believe that the Commission intended the 48 hour repair time frame articulated in Order No. 22-340 to apply in a force majeure situation.

Conclusion

Staff found that any Lumen non-compliance with Order No. 22-340 is excused by force majeure. Nevertheless, Staff is concerned with how this outage was communicated to the public, the repair timelines provided to customers, and with reports that the dedicated customer line was not working as intended with respect to customers being allowed to report outages for multiple addresses. Since the safety of this community is so directly tied to its landline service, Lumen has a heightened requirement to communicate with its customers and provide avenues for its customers to communicate with the Company. In this vein Staff believes that a post-incident assessment is appropriate to pinpoint the hurdles to effective customer communication and identify

[5] OAR 860-023-0055.

strategies for mitigating those hurdles during future outages. Specifically, the Company should address the following:

- Were customers allowed to report an outage for multiple addresses to the dedicated support line? If not, what caused the issue?
- Were customers communicated with on a timeline and in a manner consistent with Lumen policies?
- What challenges were experienced in attempting to disseminate outage information to customers? How can these challenges be addressed or overcome?

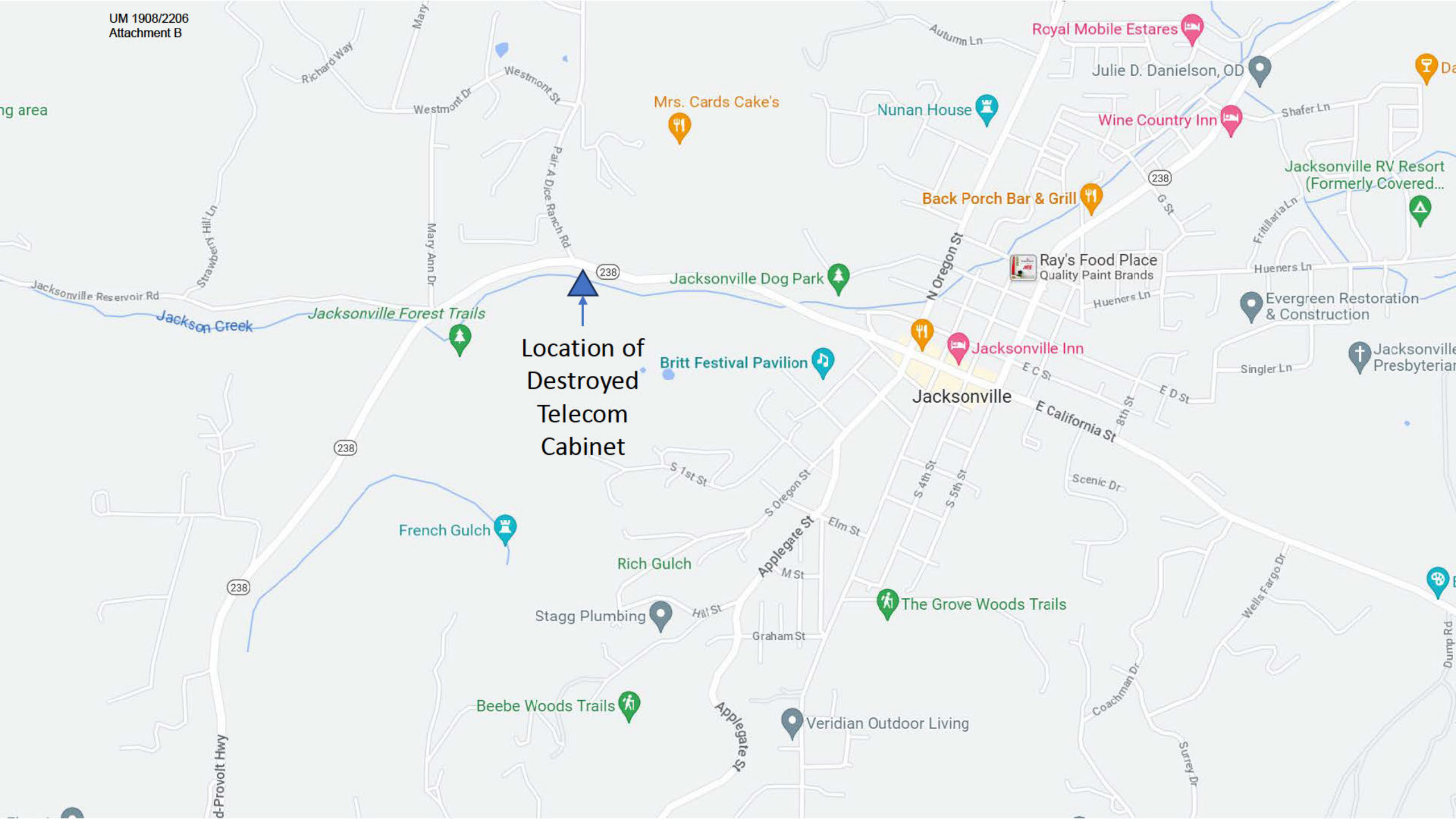
PROPOSED COMMISSION MOTION:

Direct Lumen to provide a post-incident assessment reviewing communication challenges and recommending improvements to benefit customers by October 21, 2023.

Lumen Outage Complaints Submitted to Consumer Services (redacted)

Customers	Date of Outage(s)	Commitment(s) Date Provided	Restoration Date(s)	Denied Ability to Report Multiple Outages	Co. Aware of Outage(s)
1	9/2/2023	9/6/2023	9/4/2023	Unknown	Company Unaware
2	9/2/2023; 9/7/2023	9/4/2023	9/3/2023	Yes - both outages	Company Unaware
3	9/2/2023; 9/7/2023	Unknown	9/3/2023; 9/7/2023	Unknown	Unknown
4	9/2/2023	Unknown	9/4/2023	Unknown	Unknown
5	9/2/2023; 9/7/2023	9/3/2023; 9/11/2023	9/3/2023; 9/7/2023	Yes - both outages	Unknown
6	9/2/2023; 9/7/2023	9/5/2023; Unknown	9/3/2023; 9/7/2023	Unknown	Unknown
7	9/2/2023; 9/7/2023	9/5/2023; 9/12/2023	9/4/2023; 9/7/2023	Unknown	Unknown
8	9/2/2023; 9/7/2023	Unknown	9/3/2023; 9/7/2023	Unknown	Company Unaware
9	9/2/2023; 9/7/2023	9/6/2023;9/12/2023	9/3/2023; 9/7/2023	Unknown	Company Aware
10	9/2/2023; 9/7/2023	9/6/2023; 9/11/2023	9/4/2023;9/7/2023	Unknown	Company Unaware
11	9/2/2023	9/6/2023	9/4/2023	Unknown	Company Unaware
12	9/2/2023	9/6/2023	9/4/2023	Unknown	Company Unaware
13	9/2/2023	Unknown	9/4/2023	Unknown	Unknown
14	9/2/2023; 9/7/2023	Not provided by company.	9/3/2023; 9/7/2023	Unknown	Unknown
15	9/2/2023	9/7/2023	9/4/2023	Unknown	Unknown
16	9/2/2023; 9/7/2023	9/8/2023 (both outages)	9/3/2023; 9/7/2023	Unknown	Unknown
17	9/2/2023; 9/7/2023	Unknown	9/3/2023; 9/7/2023	Unknown	Unknown
18	9/2/2023	9/4/2023	9/4/2023	Unknown	Company Unaware
19	9/2/2023	9/3/2023	9/4/2023	Unknown	Unknown
20	9/2/2023; 9/7/2023	9/5/2023; 9/11/2023	9/3/2023; 9/7/2023	Unknown	Unknown
21	9/2/2023	9/12/2023	9/11/2023	Unknown	Unknown
22	9/7/2023	Unknown	9/7/2023	Unknown	Unknown
23	9/7/2023	9/11/2023	9/7/2023	Unknown	Unknown
24	9/7/2023	9/10/2023	9/7/2023	Unknown	Company Unaware
25	9/7/2023	Unknown	9/7/2023	Unknown	Unknown
26	9/2/2023; 9/7/2023	Unknown	9/3/2023;9/7/2023	Unknown	Unknown
27	9/2/2023; 9/7/2023	9/6/2023; Unknown	9/4/2023;9/7/2023	Unknown	Company Unaware
28	9/7/2023	9/12/2023	9/7/2023	Unknown	Company Aware

UM 1908/2206
Attachment B



Attachment B

Oregon Citizens' Utility Board

610 SW Broadway, Suite 400
Portland, OR 97205

(503) 227-1984
www.oregoncub.org

October 31, 2023

via electronic filing

Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088
puc.filingcenter@puc.oregon.gov

RE: UM 1908 – Hearing on Orders - CUB's Comments on Response to Commission-Directed Inquiries and Post-Incident Report of Lumen Technologies d/b/a CenturyLink

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to provide comments on the Lumen Technologies d/b/a CenturyLink (CenturyLink or the Company) *Response to Commission-Directed Inquiries and Post-Incident Report of Lumen Technologies d/b/a CenturyLink*. CUB appreciates that the Oregon Public Utility (PUC or Commission) Staff (Staff) worked closely with the Company to understand its response to the Labor Day outages, and for expeditiously bringing the matter before the Commission for review. We also appreciate the Commissioners' adopting CUB's recommendations directing CenturyLink to explain whether it was in compliance with Order No. 22-340, as modified by Order No. 22-422, and as affirmed by Order No. 23-109 (the "Jacksonville Orders").

CenturyLink customers in Jacksonville and surrounding areas experienced a telephone service outage on September 2, 2023, connected to issues with T1 spans serving those customers, and another on September 3, 2023, due to damage to a telephone cabinet serving those T1 spans.[1] On September 20, 2023, Staff presented its analysis of the outages and recommendations on whether or not the Company was following the Commission's Jacksonville Orders.[2]

In Order No. 23-356, the Commission agreed with Staff's recommendations in part, and directed CenturyLink to, by October 23, 22023, follow up with a filing that:

1. Describes how it is complying with each requirement of Order Nos. 22-340 and 22-422 related to the September 2 and September 3 outages, and to provide supporting documentation;
2. Responds to Intervenor Priscilla Weaver's proposal for a Jacksonville-area outage triage process;
3. Provides updated call logs that include information for September 7, 2023; and
4. Includes a post-incident assessment.[3]

[1] UM 1908 – Order No. 23-356, Appx. A 3-4 at(Sept. 28, 2023).
[2] *Id.* at 1.
[3] *Id.*

The Commission provided the opportunity for public comment on CenturyLink's response. CUB provides our thoughts below.

Compliance with the Jacksonville Orders

CenturyLink states that it first became aware of the September 2, 2023, outage ("first outage") when one of its technicians received a direct phone call from a customer. It was then discovered that T1 spans were "in an out-of-balance condition" and once they were manually reset, service was restored at or around 8 pm.[4] The second outage on September 3, 2023, occurred at or around noon which CenturyLink concluded was caused by a vehicle accident or act of vandalism.[5] Based upon CenturyLink's statements and the images it provided, CUB concurs with Staff's conclusion that the second outage was a force majeure event relieving the Company of some of its service quality objective service levels.[6]

However, it is not clear from CenturyLink's filing that service was completely restored after the first outage. Several customers commented[7] that their service was still out the night of the first outage[8] and the morning of September 3, 2023, whereas CenturyLink reported that the telecom cabinet damage causing the second outage occurred midday.[9] Given an exact time of the cabinet destruction is likely unknown, it could be that this damage occurred earlier in the day, or even the night before and the second outage actually started earlier. CUB brings this up not to diminish the events or to challenge the Company's assessment, but to express our preference that the Company provide documentation that offers more transparency that a repair made is a permanent solution that adequately addresses the problem. Perhaps the manual reset was not enough to repair the issue that caused the first outage and some customers would have experienced intermittent service or ongoing outages from the initial T1 span issue if a second outage did not occur. CUB is not suggesting this is the case necessarily, but given the history of ongoing outages, intermittent service, and the fact that copper wires in the T1 spans provide service to Jacksonville-area customers, at least in the event CenturyLink must file a compliance filing or a response like in this case, CUB believes we are at a place where, moving forward, CenturyLink must provide documentation to the Commission with its compliance filing, i.e., a copy of whatever internal messaging/report it receives, when it learns service has been restored, when possible.

CUB continues to agree with Ms. Weaver that the Company's dedicated support line has not been operating as the Commission intended in the Jacksonville Orders and it has not for quite some time. As customers have shared and CenturyLink has acknowledged, several customers affected by the Labor Day outages did not receive an expedited customer service response as

[4] UM 1908 – *Response to Commission-Directed Inquiries and Post-Incident Report of Lumen Technologies d/b/a CenturyLink* at 2 (Oct. 23, 2023) (*"Lumen's Response to Commission"*).
[5] *Id.*
[6] OAR 860-032-0012(2).
[7] *See* E.W. Comments (9/5/2023); B.D. Comments (9/5/2023); B.Y. & K.R. Comments (9/5/2023).
[8] *See.* J.K. Comments (9/5/2023); M.H. Comments (9/5/2023).
[9] *Lumen's Response to Commission* at 2.

expected under the Jacksonville Orders.[10] CUB is not prepared to make a recommendation as to whether the Commission should issue penalties for violation of the provisions of the Commission's Jacksonville Orders as they pertain to the requirements for the dedicated service line. However, CUB is as encouraged as Ms. Weaver by the changes the Company has already implemented to address shortcomings with the first iteration of the dedicated line. While it is uncertain why the reasons for why the original dedicated line and customer service response has been inadequate, these changes are not only immediate, but appear to be meaningful and responsive to Ms. Weaver's suggestions and customer frustrations. CUB applauds the Company's work to improve this process for customers and believe this new strategy should facilitate compliance with the Jacksonville Orders.

Post-Assessment Considerations

Finally, CUB supports Ms. Weaver's comments in response to CenturyLink's Response to the Commisison, including her suggestion that the Company consider an automated telephone call to customers as a means of outage communication. We appreciate the Company's offer to consider alternatives for post-incident dissemination of information and/or proactive communication of service outage and repair status and hope CenturyLink takes her suggestion into consideration.[11] CUB also appreciates that CenturyLink reviewed its call logs and provided updated responses in its next bi-monthly filing.

CUB is satisfied that the Company prioritized repairs in the Jacksonville-area Labor Day outages. If another event occurs warranting the Company to demonstrate compliance with the Orders, CUB believes additional documentation to show what permanent repairs were made, or if temporary, will be made for assurance that a long-term solution has been identified, where appropriate and where possible. We are excited about CenturyLink's new dedicated service line process and are encouraged that it already seems to be working well, based upon Ms. Weaver's recent experience, and hope the Company will consider her suggestions for proactive and post-incident reporting and/or updates to customers. Finally, CUB firmly believes that it is the Jacksonville Orders that have motivated the Company to prioritize repair in these communities and are critical to ensuring better telephone service quality in these rural areas with limited reliable communication tools.

Thank you again for the opportunity to comment.

Sincerely,

Jennifer Hill-Hart
Policy Manager
Oregon Citizens' Utility Board

[10] *See* UM 1908 - Order No. 22-340, Appx. A at 8 (Sept. 23, 2023).
[11] *Lumen's Response to Commission* at 13.

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1908, UM 2206

IN THE MATTER of LUMEN TECHNOLOGIES	INTERVENOR PRISCILLA WEAVER'S SUBMISSION REGARDING SEPTEMBER 2023 OUTAGES AND LUMEN'S RESPONSE

What happened in the rural Jacksonville area over Labor Day weekend and in its aftermath is a mix of striking coincidence, Commission action, and a Lumen "triage" process put in place in response to Order 23-356. I have tried to distill all this to its hopeful, albeit preliminary, bottom line.

On September 2 we experienced our third annual Labor Day weekend outage caused by Lumen's failing infrastructure. As if that were not enough, the next day a second, unrelated outage occurred, this one caused by a vehicle bashing into a green Lumen box near Jacksonville.

As a result,

(1) Unlike the Labor Day outages in 2021 and 2022, and thanks to the looming threat of Lumen fines in the Rural Jacksonville Orders,[1] the September 2, 2023, outage was promptly resolved, but in the process,

[1] Order Nos. 22-340, 22-422, and 23-209 ("RJ Orders").

(2) customer experience in reporting the 2023 Labor Day outages, *i.e.*, the trigger to initiate the required "immediate resolution" of the outage (Order NO. 22-340 Att. A page 8) confirmed that Lumen had never been in compliance with this part of the RJ Orders, and so

(3) the Commission issued order No. 23-356 to give Lumen another chance to comply, and then

(4) on October 27, just four days after Lumen filed its Response to Order 23-356 describing the procedures it had finally put in place to comply with the RJ Orders, we had yet another outage. I never want an outage, but this one certainly was timely for testing Lumen's new procedures.

As to the bashed box outage, I agree with Lumen, Staff, and CUB it was a force majeure event. I do not have the technical knowledge to evaluate whether the repair was expeditious; I rely on Staff's conclusion that it was.

As for the new procedures, the "dedicated number" prong of the triage mechanism described on pages 4-5 of Lumen's Response to Order 23-356 passed its first test. I was at home on October 27 when the phones went out. I called the dedicated number and reached CenturyLlnk operator Jared on a clear line, no roosters. Once he confirmed I had no dial tone, he created my trouble ticket. He also created tickets for several of my neighbors who I had learned also were out. Jared assured me "doing multiple tickets isn't that hard." In short, if everyone in the rural Jacksonville area consistently has the same experience calling the dedicated number going forward, this first step in the required process can be effective.

Jared said his next step was to send an email (described in Lumen Response, page 9) to the "dispatch and field ops" Lumen personnel, who presumably are tasked with the "immediate

initiation of onsite repair" required by the RJ Orders. He also called me back at 6:30 to let me know the problem was a cable failure. Thankfully, our phones came back on after about 2 or 3 hours.

Ironically, I do not know whether the new "email to ... dispatch and field operation groups" triggered the prompt repair and so I cannot comment on whether this part of Lumen's new process will be effective going forward. That is because I also understand another customer, someone who has an inside track to a local CenturyLink technician (perhaps the same duo of customer CB and tech Matt involved in the first Labor Day weekend outage as described on page 2 of Lumen's Response?) may have called the local tech again this time. I do not know whether that technician called in the outage to dispatch (?) or field ops (?) or simply decided to start the repair on his own before Jared's email set the repair process in motion internally at dispatch or field ops. In any case, this part of the process is not clear from Lumen's response.

Maybe the "triage" part came into play (promptly alerting field ops and initiating priority repair) and so it also can work going forward, or maybe we must wait for the next outage to have it tested. Either way, to rely on the happenstance of a customer with private access whose phone might or might not be part of an outage realizing his phone is out and calling his private channel, and that technician maybe or maybe not answering his phone and maybe or maybe not being able to start the repair, obviously is not a sustainable solution. This ad hoc approach was our only hope of prompt repair from at least 2014 until Order 22-340 was entered a year ago. We are entitled to have both sustainably reliable phone service and

sustainably reliable repair service and that's what the enforcement mechanism in the RJ Orders coupled with Lumen's new triage process should give us.

What is crystal clear is this: Jared assured me that whoever provided him with his instructions is "definitely taking it seriously" and that means the enforcement provisions in the RJ Orders are having the effect the Commission intended – the shortest possible outages in our vulnerable location. We are grateful to have the Orders in place as a necessary antidote to Lumen's unreliable land line service. It's about time.

A brief note about communicating with customers. (Lumen Response pages 10—13). Lumen's reliance on its Facebook marketing page is not the answer. Millions of people no longer or never did use Facebook; some of us do not even have reliable internet out here. To ask us to scroll through sales pitches for Lumen products to get to an outage update is tone-deaf at best. Pacific Power uses automatic callbacks to notify us when power comes back on. Lumen might consider installing such a system as well.

Respectfully submitted,

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