ITEM NO. RA1

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 10, 2025

REGULAR X CONSENT ____ EFFECTIVE DATE N/A

DATE: May 29, 2025

TO: Public Utility Commission

FROM: Joseph Bartholomew

THROUGH: Bryan Conway and Russell Beitzel **SIGNED**

SUBJECT: LUMEN TECHNOLOGIES:
(Docket No. UM 1908)
Service Quality Performance Plan.

STAFF RECOMMENDATION:

Staff recommends that the Commission require Lumen Technologies Inc., dba CenturyLink (Lumen or Company)[1] to submit a service quality performance plan to meet the Commission's minimum service quality standards within 45 days.

DISCUSSION:

Issue

Whether the Commission should require Lumen to submit a service quality performance plan to meet the Commission's minimum service quality standards.

Applicable Rule or Law

ORS 756.515(1) provides that whenever the Commission believes that "any service is unsafe or inadequate, or is not afforded, or that an investigation of any matter relating to any public utility or telecommunications utility ... the Commission may on motion summarily investigate any such matter, with or without notice." Upon investigation, without notice or hearing, the Commission may make any findings and orders it deems justified or necessary as provided in Subsection (4).

[1] Lumen Technologies, Inc. is the parent of operating companies Qwest Corporation, United Telephone Company of the Northwest, CenturyTel of Oregon, and CenturyTel of Eastern Oregon.

The Commission establishes minimum service quality standards to ensure safe and adequate services for all telecommunications carriers pursuant to ORS 759.450. Under Section (5) of this statute, the Commission is required to direct a telecommunications carrier, utility or competitive provider that is not meeting the minimum service quality standards to submit a plan for improving performance to meet the standards within six months. The Commission is further required to review and approve or disapprove the plan.

Lumen is currently regulated under an ORS 759.255 Price Plan, approved by the Commission in Order No. 24-113. One of the Price Plan's objectives is to ensure that the quality of existing telecommunications services will meet or exceed Commission service quality standards.

OAR 860-023-0055 provides the statutorily required retail service quality standards for large telecommunications utilities.

Repair Clearing Time per OAR 860-023-0055(6) establishes the clearing time for all trouble reports from the time the customer reports the trouble to the large telecommunications utility until the trouble is resolved. The large telecommunications utility must provide each customer making a network trouble report with a commitment time when the large telecommunications utility will repair or resolve the problem.

Objective Service Level per OAR 860-023-0055(6)(b) states that a large telecommunications utility must clear at least 90 percent of all trouble reports within 48 hours of receiving a report for each repair center. Alternatively, for those reports that are received between 12 pm on Friday and 5 pm on Sunday, the large telecommunication utility may use the following weekend exception to calculate the percentage for trouble reports cleared: (A) The large telecommunications utility must clear 90 percent of all trouble reports received between 12 pm Friday and 5 pm Saturday by 5 pm the following Monday for each repair center. (B) The large telecommunications utility must clear 90 percent of all trouble reports received between 5 pm Saturday and 5 pm Sunday by 5 pm the following Tuesday for each repair center.

Analysis

Background
In 2014, the Commission amended its rules to relax some service quality standards as warranted. For example, the Commission approved a decrease in the 48-Hour Repair Metric from 95 percent to 90 percent complete within 48 hours and allowed for a weekend exemption along with some added safety-net protections.

Staff has been working with Lumen for several years in an attempt to improve service quality on several metrics. The Commission has adopted two previous service quality performance plans for Lumen under ORS 759.450(5) in May 2017[2] and June 2021.[3]

Most recently, on December 14, 2021, the Commission also opened an investigation into the provision of telephone service in the Jacksonville area due to poor service quality including Lumen's 48-hour repair time.[4]

On April 30, 2024, the Commission approved a new Price Plan[5] in which Lumen is incentivized for better service quality by tying in service quality metrics to the ability to increase pricing.

Failure to Meet Service Quality Measurement Standards
Lumen has failed to meet the standard for repair clearing time from January 2021 to present for Qwest and CenturyTel, and from January 2019 to present for United. OAR 860-023-0055(6)(b) states:

> A large telecommunications utility must clear at least 90 percent of all trouble reports within 48 hours of receiving a report for each repair center. Alternatively, for those reports that are received between 12 pm on Friday and 5 pm on Sunday, the large telecommunication utility may use the following weekend exception to calculate the percentage for trouble reports cleared:
>
> (A) The large telecommunications utility must clear 90 percent of all trouble reports received between 12 pm Friday and 5 pm Saturday by 5 pm the following Monday for each repair center.
>
> (B) The large telecommunications utility must clear 90 percent of all trouble reports received between 5 pm Saturday and 5 pm Sunday by 5 pm the following Tuesday for each repair center.

Lumen's statewide 48-hour repair time average is shown in Table 1, below. This table also includes each affiliate, CenturyTel (C), Qwest (Q), and United (U) 48-hour repair time:

[2] Commission Order No 17-175, Docket No. UM 1836 (May 16, 2017).
[3] See Commission Order No. 01-689, Docket No. UM 1026 (August 1, 2001) (resulting in an MOU between Staff and Lumen approved on July 24, 2001).
[4] Commission Order No 21-470, Docket No. UM 2206 (December 20, 2021).
[5] Commission Order No 24-113, Docket No. UM 1908 (April 30, 2024).

Table 1: Lumen Average Repair Clearing Time from April 2024 to March 2025.

See Attachment A for a more in-depth view of repair time.

Statewide RCT 48			
	TTs Cleared - 48 Hrs	Total TTs	TTs Cleared - 48 Hrs %
C WIRE CENTERS - TTs CLEARED - 48 HRS	652	1,455	44.8%
Q WIRE CENTERS - TTs CLEARED - 48 HRS	5,084	10,354	49.1%
U WIRE CENTERS - TTs CLEARED - 48 HRS	431	1,180	36.5%
LUMEN WIRE CENTERS - TTs CLEARED - 48 HRS	6,167	12,989	47.5%
12 MONTH AVERAGE COMPLIANCE %		47.5%	

Conclusion

Staff concludes that Lumen has failed to meet the service quality standards, for 48-hour repair times and that formal efforts (Price Plan) and informal outreach (monthly meetings) to the Company have not rectified the issue. ORS 759.450(5) states that the Commission shall require a telecommunications utility that is not meeting the minimum service quality standards to submit a plan for improving performance.

Staff concludes that it is necessary for Lumen to be required to submit such a plan for Commission consideration

PROPOSED COMMISSION MOTION:

Require Lumen Technologies' to submit a service quality performance plan for its operating companies to meet the Commission's minimum service quality standards for 48-hour repair times within 45 days.

Company: Qwest — **48 hour clear time %**

Year

Month	2019	2020	2021	2022	2023	2024	2025
January	93.7%	96.0%	66.0%	67.5%	57.0%	36.5%	48.3%
February	96.7%	98.3%	59.2%	53.7%	49.5%	32.5%	49.8%
March	94.2%	98.9%	80.5%	81.5%	57.0%	44.7%	49.1%
April	95.2%	97.6%	91.3%	74.7%	59.2%	47.8%	
May	95.2%	95.7%	92.3%	77.4%	60.9%	51.8%	
June	96.9%	96.3%	88.2%	70.6%	68.9%	47.1%	
July	95.7%	98.0%	82.7%	68.6%	62.6%	47.9%	
August	97.5%	96.4%	71.7%	66.3%	63.4%	47.1%	
September	96.2%	95.3%	78.9%	66.4%	62.1%	47.3%	
October	98.3%	83.9%	73.1%	75.5%	48.3%	48.3%	
November	98.1%	78.9%	44.0%	65.8%	55.7%	47.7%	
December	96.3%	83.5%	73.6%	72.8%	41.4%	48.3%	

Company: United — **48 hour clear time %**

Year

Month	2019	2020	2021	2022	2023	2024	2025
January	59.0%	55.2%	56.0%	51.0%	51.7%	58.0%	34.8%
February	77.0%	35.0%	60.0%	32.0%	66.3%	46.0%	35.7%
March	83.0%	45.0%	62.0%	56.0%	62.9%	46.0%	36.5%
April	83.0%	75.3%	82.0%	57.0%	70.0%	48.0%	
May	73.0%	84.7%	87.0%	57.0%	55.7%	58.0%	
June	68.0%	92.3%	79.0%	75.7%	61.0%	35.0%	
July	48.0%	67.3%	70.0%	47.0%	66.3%	34.5%	
August	60.0%	87.0%	77.0%	54.3%	61.3%	35.2%	
September	58.0%	87.7%	71.0%	65.7%	69.0%	34.0%	
October	52.9%	83.7%	66.0%	74.7%	68.0%	33.2%	
November	68.9%	68.0%	53.0%	65.0%	56.0%	33.6%	
December	55.2%	62.0%	56.0%	57.7%	56.0%	33.9%	

Company: CenturyTel — **48 hour clear time %**

Year

Month	2021	2024	2025
January	52.0%		45.9%
February	65.2%		45.4%
March	73.4%		44.8%
April	75.9%		
May	72.4%		
June	77.0%	47.1%	
July	82.1%	48.0%	
August	82.3%	48.9%	
September	84.0%	49.0%	
October	71.1%	48.3%	
November	64.1%	49.4%	
December	61.1%	48.1%	

NOTE: CenturyTel was on a waver from 2008 until the new Price Plan reporting started in June 2024. This waiver was approved per order # 08-205. Staff requested 2021 as part of the new Price Plan review.

Did not meet standard of 90% or better