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July 2, 2020

Via Email Only

Board.Secretary@bpu.nj.gov

Aida.camacho@bpu.nj.gov

Hon. Aida Camacho-Welch, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
P.O. Box 350
Trenton, New Jersey 08625-0350

RE: Notice by United Telephone Company of New Jersey, Inc. d/b/a CenturyLink
of Changes in the Clinton, New Jersey Business Office Functions Pursuant to
N.J.A.C. 14:3-5.1(c)
BPU Docket No. TO2007

Dear Secretary Camacho-Welch:

The undersigned represents United Telephone Company of New Jersey, Inc. d/b/a CenturyLink (“CenturyLink” or the “Company”). Pursuant to N.J.A.C. 14:3-5.1(c), the purpose of this letter is to provide notice to the New Jersey Board of Public Utilities (the “Board”) of the Company’s plans to change the manner in which certain functions are performed at its Clinton, New Jersey business office. Specifically, the Company intends to transition to a “virtual” customer service function and to alter the manner in which it accepts certain forms of bill payment at its Clinton business office.

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Background

CenturyLink provides telecommunications services to residential and business customers located in the northwest portion of New Jersey, a service territory that is largely rural and suburban in nature. Presently, CenturyLink serves approximately 50,000 voice access lines in New Jersey—a figure that continues to decline as customers elect to “cut the cord” and eliminate landline service. As voice access lines have decreased, the demand for fully staffed walk-in customer service facilities has also decreased significantly. Additionally, the advent of convenient telecommunications and internet based “virtual” customer service platforms has further decreased the need for, and the demand for, walk-in customer service facilities. The COVID-19 global pandemic has further accelerated these changes as customers seek to practice responsible social distancing and minimize physical interactions to prevent the spread of the novel corona virus.

CenturyLink maintains a business office at 160 Center Street, Clinton, New Jersey 08809, which is also the location of the Company’s Clinton central office. The Clinton business office is the only such facility of CenturyLink’s nationwide. Prior to the COVID-19 global pandemic, the Clinton business office was staffed in-person by a single CenturyLink employee and was open to the public from 9:00 AM to 5:00 PM Monday through Friday. Customers were able to conduct the following activities at the Clinton business office: make bill payments, inquire about bills, initiate and terminate service, lodge complaints, and make service inquiries.

Over the last 12 months, CenturyLink generally received, on average, three visits per day to the Clinton business office. The majority of these visits were made by repeat customers each month for the purpose of paying a bill (typically by check, but also by cash) or to raise a billing question. CenturyLink also processed credit card bill payments at this location, but this option

was used less often as customers can contact the Company's customer service representatives directly via the phone or online and pay with a credit card. The accessibility of the Clinton business office complies with the Americans with Disabilities Act ("ADA"), and includes two accessible parking spots near the entrance of the building. It is located approximately 0.3 miles from the Clinton Park and Ride facility, which is served by several public bus routes, and is approximately 1.6 miles from the Annandale New Jersey Transit train station.

Although CenturyLink maintains the Clinton business office, the vast majority of CenturyLink customers interact with the Company's customer service function via the telephone or online. These resources are convenient, easily accessible and most customers are clearly comfortable utilizing telephone and online resources. CenturyLink customer service representatives are available via toll-free numbers to order new services, make bill payments, and receive account support during the hours of 8 AM to 10 PM Monday through Friday, 10 AM to 8 PM Saturday, and 1 PM to 7 PM Sunday. Similar support is also available with extended hours via CenturyLink's website [www.centurylink.com] including live web chat options. The Company also offers social media support options through Facebook and Twitter including extended hours Monday through Friday 8 AM to 1 AM, and weekends 10 AM to 8 PM. Support for repair requests is available 24x7.

In addition, CenturyLink maintains relationships with multiple third-party partners that enable customers to pay their CenturyLink bills at retail locations throughout CenturyLink's service territory, across the State of New Jersey, and at locations nationwide. Currently, there are approximately 10 retail locations within 10 miles of Clinton, New Jersey and over 60 retail locations within 20 miles of Clinton. In total, CenturyLink identified over 300 third-party retail locations across the State of New Jersey available to accept payment on CenturyLink accounts. The list of third-party retail locations is diverse and includes chain stores such as Wal-Mart,

Walgreens, and Weis markets. These locations typically operate on a more expanded schedule, often seven days a week, and offer customers the option to pay their CenturyLink bill for a convenience fee that is currently approximately \$2.00.

On March 20, 2020, in response to the COVID-19 global pandemic and multiple Executive Orders issued by Governor Murphy, CenturyLink notified the Board that it was temporarily closing its Clinton business office to in-person customer visits. The Clinton business office remains closed to customers at this time. The single employee is working remotely. As businesses are adapting to changing customer and employee concerns in response to the global pandemic, CenturyLink has decided to change how it performs certain functions at its Clinton business office and hereby provides this notice letter to the Board describing those anticipated changes.

Upcoming Changes

Prior to the pandemic, CenturyLink experienced limited demand for walk-in customer services at the Clinton business office. With the pandemic related closure, the Company does not anticipate that customer demand for in-person bill payment and/or customer services will return as customers have become accustomed to the ease and convenience of other bill payment options and virtual customer service platforms. Therefore, CenturyLink has decided to transition to a virtual customer service platform at the Clinton business office. This approach will enable walk-in customers to the Clinton business office to use a dedicated customer service kiosk to connect directly via telephone with CenturyLink customer service and repair representatives. Customers using the Clinton business office will be able to pick up a phone and speak with a customer service representative during normal business hours to make credit card bill payments, to make billing inquiries, to initiate and terminate service, to lodge complaints and to make service inquiries.

In addition to the transition to a virtual customer service platform, CenturyLink intends to stop taking certain types of bill payments (by cash or check) at its Clinton business office and will instead direct customers who wish to pay their bills using cash or a check to a nearby third-party retail partner. The Company intends to implement this change upon the re-opening of the Clinton business office, which is currently anticipated to occur in August 2020. At that time, the Company will again accept credit card payments from walk-in customers using the dedicated customer service phone located in a kiosk at the Clinton business office.

Currently, the closest third-party retail facility to the Clinton business office is contained in the Walgreen's located at 37 Old Route 22, Clinton, New Jersey 08809. The store is approximately 0.7 miles from the Clinton business office. Its hours of operation are 8:00 AM to 9:00 PM Monday through Saturday, and 8:00 AM to 6:00 PM on Sunday. The Clinton Walgreens is conveniently located on one of the major thoroughfares in Clinton. There is ample free parking, including 3 accessible parking spaces directly adjacent to the Walgreen's entrance, and the facility is accessible to customers with mobility challenges. In addition, the Walgreen's location is served directly by Hunterdon LINK public bus service (Route 15), with a stop at 37 Old Route 22. Two other LINK bus lines (Routes 17 and 18) also serve the Clinton Park and Ride (as does bus Route 15), which is located approximately 0.8 miles away. In addition, the next closest location is in the Wal-Mart Store at Route 513 and I-78, Clinton, New Jersey 08809, which is approximately 2.0 miles from the Clinton business office and approximately 2.0 miles from the Clinton Park and Ride. There is ample free parking, including 6 accessible parking spaces near the entrance to the Wal-Mart, and the facility is accessible to customers with mobility challenges. Its hours of operation for bill payment are 8:00 AM to 9:00 PM seven days a week. In addition, the Wal-Mart is served directly by Hunterdon LINK public bus service (Routes 15, 17 and 18), with a stop at the Wal-Mart entrance. CenturyLink would note that

because these facilities are located in businesses that are considered “essential,” they have remained available to customers during the pandemic.

As a result of the pandemic related office closure, the Company has already posted signage at the Clinton business office indicating ways that customers can contact customer service representatives and also advising customers about the availability of the third-party payment options, so that customers are fully aware of the large network of convenient payment locations available to them. The Company intends to maintain signage noting the closest bill pay locations and hours of operation of the kiosk.

CenturyLink has experienced no customer complaints as a result of the pandemic related closure of the Clinton business office, and customers have transitioned seamlessly to interacting with the Company via telephone and computer-based platforms. CenturyLink anticipates that the virtual customer service platform will meet the needs of the handful of customers who may periodically wish to use the Clinton business office in the future.

The Company’s Changes are in the Public Interest

A number of concerns inform the Company’s decision to implement these changes. First, even prior to the pandemic, customers have gravitated away from travelling to physical locations and have instead shown a preference for using telephone and internet-based tools to access customer services. These tools are designed to be convenient, secure, easily accessible, and to give customers options for when and how they interact with the Company. The Company’s changes are consistent with meeting these evolving customer preferences by utilizing technology to access customer services, and by emphasizing a network of convenient payment locations, rather than a single business office with limited hours.

Second, CenturyLink has seen foot traffic at its physical locations decline sharply in recent years, making it difficult to support the need for an individually (in-person) staffed

customer service office. Indeed, of all CenturyLink affiliates, the Clinton business office is the only such facility nationwide. Now, as customers and employees look for ways to minimize unnecessary physical contact and practice social distancing, CenturyLink believes the demand for in-person services at its Clinton business office will further decline. By maintaining the Clinton business office but staffing it efficiently using centrally located customer service representatives and virtual platforms, customers can still visit the Clinton business office location and transact business with trained Company personnel. Additionally, for those customers wishing to make a telephone credit card payment, that service will continue to be available at the Clinton business office location.

Third, as the number of walk-in facilities has declined, maintaining safe and secure physical and computer facilities has become more complex and costly for the Company. The COVID-19 pandemic has only increased concerns on the part of both customers and employees regarding the safety of physical locations, and will likely continue to shape preferences for some time. CenturyLink believes its resources can be better deployed in other aspects of its business.

Fourth, the Clinton business office customer traffic has tended to be made up of a very small number of customers, many of whom are repeat customers. As a result of the pandemic-related office closure, those customers, especially the repeat customers, have now had several months in which to transition to interacting with the Company via telephone or computer-based customer service platforms, and to use the convenient third-party payment locations if desired. To serve the needs of those customers (should they elect to return to the Clinton business office), the Company will post detailed signage regarding the change to a virtual customer service platform, and the location and hours of the closest third-party retail locations. Furthermore, CenturyLink will continue to communicate directly with those repeat customers regarding these alternatives up to the time by which CenturyLink completes the transition in August 2020.

Hon. Aida Camacho-Welch, Secretary

July 2, 2020

Page 8

CenturyLink believes this approach will address the needs of its small repeat customer population.

Finally the Clinton business office will remain at its present location. This letter does not seek to close that office, but rather to provide notice of how functions at that office will change. CenturyLink believes these changes will be a benefit to customers and are in the public interest. By emphasizing the use of socially distant customer service tools, along with the availability of numerous payment locations, the Company is providing greater flexibility to those customers who wish to pay their bills in-person. Indeed, the Clinton third-party locations will each operate more than twice the number of hours of the Clinton business office, and both locations are served directly by public bus lines.

WHEREFORE, CenturyLink respectfully notifies the Board of its intention to change the manner in which it accepts certain forms of payment at its Clinton business office and its transition to a virtual customer service platform, which changes will be implemented as described herein in August 2020. If you have any questions, please contact Josh Motzer at 614-441-0393 or the undersigned.

Respectfully submitted,



Colleen A. Foley

Cc: Service List

SERVICE LIST

Notice by United Telephone Company of New Jersey, Inc.
d/b/a CenturyLink Of Changes in the Clinton, New Jersey Business Office Functions
Pursuant to *N.J.A.C. 14:3-5.1(c)*
BPU Docket No. TO2007 ____

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