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Via Electronic Mail Only

November 19, 2020

Ms. Aida Camacho-Welch,
Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: I/M/O the Notice by the United Telephone Company 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. TO20070476

Dear Secretary Camacho:

The New Jersey Division of Rate Counsel (“Rate Counsel”) has reviewed the above referenced filing of United Telephone Company d/b/a/ CenturyLink (“CenturyLink” and/or “Company”) requesting permission from the New Jersey Board of Public Utilities (“Board”) to transition to a virtual customer service platform at the Clinton business office. Rate Counsel is filing electronically only. Kindly confirm receipt of the electronic filing for Rate Counsel’s record.

After review of the Company’s filing and responses provided to data requests by Board Staff, Rate Counsel respectfully recommends that Board acceptance or approval of the Company’s proposed transition of its Clinton business office to a virtual customer service platform be conditioned on the three recommendations discussed below to mitigate the potential

for detrimental impact on customers and ensure the transition to a virtual platform business office is in the public interest.

Background

CenturyLink provides telecommunications services (voice access lines) to approximately 50,000 customers throughout its mostly rural and suburban New Jersey service territory.¹ Pursuant to *N.J.A.C. 14:3-5.1(a)* and (b) a utility shall maintain an “in-person” office in its New Jersey service area, for customers to initiate and terminate service, file complaints, submit service inquiries, make bill payments, and provide other functions as determined by the utility. As required under the Board’s regulations, CenturyLink maintained a central customer service business office located at 160 Center Street, Clinton, New Jersey 08809, operating from 9:00 a.m. to 5:00 p.m., Monday through Friday. The office was staffed with one employee and served an average of three customers per day.² On March 20, in light of the pandemic and following several Executive Orders issued by the Governor, CenturyLink notified the Board that the Clinton office would be temporarily closed.³ The sole customer service representative was initially assigned to work remotely.⁴ As of September 1, 2020, the service representative that had been assigned to the Clinton business office is no longer there and the Company is not planning on having an employee assigned to that location.⁵

¹ Petition, p. 2

² Id., p. 2, noting that the average was based on data gathered over a 12-month period and that “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.” Id. See also, CenturyLink response to data request Board Staff 5.

³ Id., p. 4, noting, the Clinton office employee has since been working remotely up through August 30, 2020. See CenturyLink response to data request Board Staff 21.

⁴ Petition, p. 4.

⁵ CenturyLink response to data request Board Staff 21.

Filing

On July 2, 2020, CenturyLink filed with the Board its intention to transition the Clinton business office to a virtual customer service platform at the end of August 2020. The filing is made in compliance with *N.J.A.C. 14:3-5.1(c)*, which requires that a utility file written notice with the Board of any proposed change in the functions of a business office, at least 14 business days prior to the change being made. The filing notes that the office location would remain open but it would no longer have an in-person customer service representative.⁶ CenturyLink asserts that the transition to a virtual-type office would continue to allow customers to reach CenturyLink customer service representatives via a handset or online through a virtual platform to effectuate bill payments, submit billing and service inquiries, request service and file complaints.⁷ CenturyLink states that during the COVID-19 interim office closure (from March 20 – August 30) customers have gravitated to alternative methods for bill payments and fulfillment of other service needs by:

- accessing customer service representatives via the telephone available: M-F (8 AM to 10 PM); Sat (8 AM to 8 PM) and Sun (1 PM to 7 PM);⁸
- online at www.centurylink.com which includes live web chat options;
- accessing customer service support through Facebook, and Twitter with extended hours M-F 8 AM to 1 AM, and weekends 10 AM to 8 PM.

The Company noted that customers continue to have 24/7 access for repair requests and equipment returns have been handled via return shipping process through a prepaid package.⁹

⁶ Petition, p. 5.

⁷ Id., p.3.

⁸ Id., pp. 3-4, and CenturyLink response to data request Board Staff 5.

In connection with bill payments and convenience fee surcharges, the Company noted that customers:

- may make bill payments (using their checking) online or on the automated phone system free of charge;
- may make bill payments with the assistance of a CenturyLink customer service representative with a \$3.50 surcharge convenience fee (unless registering for auto-payments);
- may also make bill payments by using a credit card or debit card with a \$3.50 surcharge convenience fee (unless opting to register for auto-payments);¹⁰ or
- may make bill payments using third-party partners (including but not limited to CheckFreePay and Western Union) with a \$2.00 to \$3.00 surcharge convenience fee.¹¹

Third-party retailers located closest to the Clinton office include:¹²

- Walgreens located 0.7 miles away (open Mon to Sat 8AM – 9PM, and Sun, 8AM – 6PM) and charges a \$2.00 convenience fee for bill payment transaction;
- Wal-Mart located 2 miles away (open 8AM to 9 PM, Mon - Sun) which also charges a \$2.99 bill payment convenience fee, and Weis markets.

The Company states the above third-party partners have remained opened throughout the pandemic, as they are deemed “essential” businesses. Additionally, noting that these businesses are accessible by public transportation, located in areas that have “parking accessible to customers with mobility challenges” and structures that are ADA compliant.¹³ Moreover,

⁹ CenturyLink response to data request Board Staff 5. CenturyLink notes that the process is further addressed at: <https://www.centurylink.com/home/help/account/how-to-track-your-order-status.html>; <https://www.centurylink.com/home/help/account/how-to-cancel-your-centurylink-service.html>; <https://www.centurylink.com/home/help/internet/modems-and-routers/how-to-pack-and-return-the-modem.html>.

¹⁰ CenturyLink response to data request Board Staff 16.

¹¹ Petition, pp. 3-4. See also CenturyLink response to Board Staff 18 and 19 (data requests).

¹² Id.

¹³ Petition, pp. 5-6. CenturyLink noted that “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

“there are approximately 10 retail locations within 10 miles of Clinton, New Jersey and over 60 retail locations within 20 miles of Clinton and in total over 300 third-party retail locations across the State of New Jersey available to accept payment on CenturyLink accounts.”¹⁴ Providing greater flexibility for customers seeking to pay bills in-person as these third-parties have extended hours of operation.”¹⁵

CenturyLink asserts that the loss of foot traffic in recent years makes it difficult to support the need for an in-person staff office and the Clinton office is the only such facility nationwide among its affiliates.¹⁶ Additionally, noting it has not “received customer complaints as a result of the temporary pandemic related temporary closure of the Clinton business office, as customers have successfully transitioned to interacting with the Company via telephone and computer-based platforms.”¹⁷ Adding that conversion of the Clinton office will allow the Company to efficiently use centrally located customer service representatives and virtual platforms so customers can still visit the Clinton office location and transact business with trained Company personnel, while minimizing unnecessary physical contact and allowing all to practice social distancing.¹⁸ CenturyLink asserts the proposed conversion will meet the needs of all customers (many of whom had already (pre-pandemic) gravitated away from visiting 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.” . . . “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.” Id. See also, CenturyLink data response to Board Staff 18.

¹⁴ Petition, pp.

¹⁵ Id., pp. 3 and 8.

¹⁶ Id., p. 7.

¹⁷ Id., p. 6.

¹⁸ Id., pp. 6-7.

physical business office) and the handful of customers who may periodically wish to use the Clinton business office in the future,” will be able to do so, committing to ensure the needs of this small class of customers will be addressed.¹⁹ CenturyLink stated that the office saw on average approximately three visits per day (M-F, based on a 12-month review) and further confirmed that the foot traffic averaged 63 customers per month (who are repeat monthly customers, who pay their bills in person) during a 24 month period and noted the “level of traffic equates to only 0.2% (two-tenths of one percent) of CenturyLink’s New Jersey voice access lines.”²⁰ Additionally, CenturyLink noted that maintaining safe and secure physical and computer facilities has become more complex and costly for the Company and the COVID-19 pandemic has only increased concerns on the part of both customers and employees regarding the safety of physical locations.²¹ Therefore, CenturyLink states the transition to a virtual customer service platform at the present Clinton office location makes sense, will provide a benefit to customers and is in the public interest.²²

Discussion

Rate Counsel notes that the Clinton office location has been temporarily closed since mid-March 2020 due to the COVID-19 pandemic. To date Rate Counsel has not received any customer complaints in connection with the temporary closure of this customer service office. As noted in the filing, the proposed virtual customer service platform will not deliver the same level of assistance that had previously been provided to customers by the former in-house

¹⁹ Id., pp. 6 and 7-8.

²⁰ Petition, p. 2 and CenturyLink response to data request Board Staff 9.

²¹ Id., p.7.

²² Id., p. 8.

customer service representative in several respects. For example, the virtual platform reduces or completely eliminates a customer's ability to make bill payment without incurring a convenience surcharge fee, as only electronic check payments made online or using the automated phone system would be free of charge.²³ Therefore, the virtual platform may present particular challenges or difficulties for customers who are not technology proficient or may have disabilities that prevent them from using the free no fee bill payment options on the virtual platforms thus, forcing these customers to use other payment options that will incur a convenience fee or electronic banking surcharge. Likewise, customers will no longer be able to return equipment at this location. Additionally, the filing does not address how the virtual office equipment will be monitored, maintained and repaired to avoid additional distress and inconvenience to customers.

These issues and the contemplated departure from the traditional services customers were expecting would return to this location merit public notice to customers with an opportunity for customer comment. Additionally, to ensure customer needs are being adequately met on the new virtual platform, the Board should require quarterly performance reports of the virtual customer service platform and customer complaints in connection with the services provided on the platform during the first year of transition.

Rate Counsel respectfully recommends that the Board include in its acceptance or approval of the transition, the above recommended conditions, or other conditions the Board may

²³ Petition, pp. 3-4, See also CenturyLink data responses to data requests: Board Staff 16, Board Staff 18, Board Staff 19.

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deem are prudent and warranted to ensure the transition to a virtual customer service platform does not detrimentally impact customers and is in the public interest.

Respectfully submitted,

Stefanie A. Brand, Esq.,
Director,
New Jersey Division of Rate Counsel

/s/ Maria Novas-Ruiz
Maria Novas-Ruiz
Assistant Deputy Rate Counsel

MNR/td
cc: 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)

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