

Pennsylvania Telephone Association

"The Communications
Leader in Pennsylvania"



June 15, 2020

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Re: **M-2020-3020055**
COVID-19 Customer Service, Billing, and Public Outreach Provisions
Request for Utility Information
TDS Telecom – Deposit

Dear Secretary Chiavetta:

In response to the Secretarial Letter dated May 29, 2020 at the above docket, please find the replies from the company noted.

Sincerely,

Steven J. Samara
President

cc: Sarah Dewey (via email)
Tom Charles (via email)

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Consumer Service and Billing Policies and Procedures

1. Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

Response: TDS certainly understands the significance and impact of the COVID – 19 pandemic and is fully committed to supporting customers who are the hardest hit by the economic challenges attributed to the outbreak. TDS, in addition to signing on and extending the FCC Pledge to June 30th, provided information on its website, drafted communications and used network tools to avoid / reduce physical interactions with customers and to educate the customers of the FCC Pledge. The network tool, where technicians could view inside a customer’s home to trouble shoot with the customer, avoided customer / tech physical interactions.

Termination of Utility Service:

1. After the Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?
 - o How does the utility plan to implement terminations and will it start the process with new termination notices?

Response: On June 3, 2020, Governor Wolf extended the 90-day State of Emergency. However, the PUC Emergency Order issued March 13, 2020 (M-2020-3019244) provides the opportunity for the Commission to end the moratorium earlier or extend it longer. The termination of essential services for nonpayment will resume on July 1st. New customer notices will be mailed then.

2. Broken out by customer class, how many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?
 - o Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
 - o Provide future projections if available.

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Response: Customers that were (are) subject to termination: June 2019 = 19 Consumer and Commercial customers permanently disconnected. June 2020 = 73 pending non-pay Consumer and Commercial customers. (these customers will receive a notice and have time to make a payment or arrangements prior to July disconnects)

Future projects are not available.

3. Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

Response: After July 1st, if any services are disconnected for non-payment reconnection fees will apply to future statements. TDS does offer payment arrangements for all customers.

Universal Service Programs:

1. Is the utility currently removing customers from CAP for non-payment or failure to recertify?

Response: Not applicable

2. What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

Response: Not applicable

Other Assistance Initiatives:

1. Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

Response: TDS offered 60-days free Internet service to anyone that have K-12 or college age children in their home. TDS did not require any proof or documentation for this offer. This offer was also available to customers that would qualify for Lifeline services.

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TDS monitors the spread of COVID-19 and is following the situation in a coordinated manner with federal, state, and local health and safety officials. TDS continues to assess impacts and establish protocols for the benefit of our customers, employees and our network.

TDS is committed to providing reliable service to both business and residential customers during the COVID-19 pandemic time period. TDS has taken precautions to anticipate increased usage demands, maximize the available bandwidth, and minimize potential for network slowdowns.

TDS provides additional information to our customers through communications and website information.

TDS established a Pandemic Tactical Team that monitors the situation in a coordinated manner with federal, state, and local health and safety officials. We implemented the following protocols to protect our customers and employees, while also keeping our network performing. Our Business Continuity Plan further addresses crisis events.

2. Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

Response: For customers who took advantage of the free 60-day offer, they were given a new customer promotion and an additional \$10 off for the 6 months after the 60-day free offer expired.

TDS continues to expand policies and training to any staff that interacts directly with customers has received additional hygiene training and sanitation toolkits, to ensure both the employee and the customer is fully protected. Before scheduling business or in-home visits, customers are asked if anyone in the home or business is exhibiting symptoms. Further TDS is using new software tools that reduce the tech / customer interaction regarding service calls.

Consumer Education and Outreach

1. Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

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Response: TDS informs all existing customers annually of the Lifeline program, and refers customers to our Terms of Service and Privacy Policy on our website, www.tdstelecom.com. All customers were sent an email regarding TDS COVID-19 efforts. These were also posted prominently on the main page of our website

2. Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

Response: TDS informs all existing customers annually through bill inserts, printed bill messages, and email of the Lifeline program. These messages are available on our online bill-pay system as well. The COVID-19 60-day free offer was mentioned on our website.

3. Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

Response: TDS is not aware of any proceedings that may include telephonic public input hearings and allowing customers to be able to make their voices heard.

4. Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

Response: TDS communicated changes through releases, information posted on its website and through customer / service representative interactions.