

Suzan DeBusk Paiva
Associate General Counsel



900 Race Street, 6th Floor
Philadelphia, PA 19107

Tel: (267) 768-6184
Suzan.D.Paiva@Verizon.com

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VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: COVID-19 Customer Service, Billing, and Public Outreach Provisions Request
for Utility Information, Docket No. M-2020-3020055

Dear Secretary Chiavetta:

I write today to update you on Verizon's response to the COVID-19 pandemic and to respond to the Commission's request for information in its May 29, 2020 Secretarial Letter.¹

As you're aware, from the start of the COVID-19 pandemic, Verizon took a number of steps to meet the needs of consumers, those on the front lines, the communities we serve, and our employees. Among several other initiatives, we were the first company to announce that we were extending our commitment, initially made under the FCC's Keep America Connected pledge, to not disconnect service to or charge late fees to customers who informed us that they had been impacted financially by the pandemic through June 30, 2020. For our Lifeline customers, we took the additional step of providing a two-month billing credit. Expanding beyond our Commission-regulated services, we are offering new affordable residential Fios internet plans for low-income households through July, and we have made more than \$55 million in contributions and donations to nonprofits around the globe. To find out more about what Verizon is doing to help its customers and the community during the COVID-19 pandemic, visit [verizon.com/about/news/our-response-coronavirus](https://www.verizon.com/about/news/our-response-coronavirus).

All of our efforts are just part of why we were particularly honored to be ranked #1 on the new [Forbes Corporate Responders ranking list](#), which assessed how well the 100 largest employers among U.S. public companies responded to the COVID-19 public health crisis. The

¹ Given that the specific questions are directed to Commission-regulated residential consumer and small business services, the answers are provided for Verizon Pennsylvania LLC, Verizon North LLC, unless otherwise indicated.

article noted our expansive sick leave policies, backup dependent care, and efforts to help surrounding communities.

During this time of heightened worry and concern, our primary goal has always been to keep our customers, employees and society connected to the things that matter most to them: their family, friends and business customers. Our response to the Commission's specific questions follows:

- 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:**

In addition to complying with the Commission's March 13, 2020 Emergency Order at Docket M-2020-3019244, Verizon has undertaken the following initiatives in response to COVID-19.

Verizon is a signatory to the FCC pledge under which it agreed to "not terminate service to any residential or small business customers because of their inability to pay their bills due to the disruptions caused by the coronavirus pandemic" and to "waive any late fees that any residential or small business customers incur because of their economic circumstances related to the coronavirus pandemic." Initially, we made this commitment on March 13 through May 13, 2020. Verizon led our industry by deciding to extend our commitment to our customers to June 30. A Pennsylvania residential or small business customer simply needs to let us know that they are experiencing hardship due to COVID-19 to avoid disconnection and have late fees waived. No specific details are required, and we have implemented a simple process for customers to use online or over the phone to let us know. Please note that for services subject to the Emergency Order customers do not need to contact us as the terms of that order apply automatically.

We have informed customers of this modification that we have made to our policies and practices in a variety of ways. First, extensive information on this initiative and other COVID-19 responses is available on our website. Additionally, customers received an April 27 email or letter from Ronan Dunne, Verizon Consumer Group CEO, which explained that we had extended our commitment to waive late fees and not terminate service for those consumers and small businesses who are unable to pay due to disruptions caused by the coronavirus pandemic. Mr. Dunne's email also explained that customers who notify us will also be automatically enrolled in our Stay Connected program (described in detail in response to question 9 below) to help manage their payments after June 30.

Also, as is also described in more detail below, we have provided a two month billing credit to all Lifeline customers as of March 20, 2020 and informed them of this credit via a bill message and information posted on our website.

- 2. 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? How does the utility plan to implement terminations and will it start the process with new termination notices?**

During and after the effective period of the Commission's Emergency Order on Terminations, customers may contact Verizon, either through our website or by calling into our call centers, to self-identify that they have been impacted by COVID-19. Through June 30, customers who notify us will also be automatically enrolled in a program called Stay Connected that will help them manage their unpaid balance payments after the expiration of the FCC Pledge. After June 30, customers who are protected by the Emergency Order and contact us for assistance (and who did not contact us prior to June 30) will be offered the opportunity to enter into payment arrangements lasting up to three months to address their unpaid balances.

We have already implemented new collections strategies that prevent denial notices from being sent to customers when the account becomes delinquent during the Emergency Order. This new strategy allows Verizon to contact the customer through multiple letter, text and email notices as well as reminder phone calls before any suspension or termination of service. While every account is managed individually, the typical window for disconnection is between 81-100 days from when an account becomes past due.

3. 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?

It is impossible to predict how many Verizon customers of Commission-regulated services will ultimately be subject to termination. An individual's ability to pay past due charges is constantly changing. Moreover, if customers self-identify through the FCC Pledge process as being impacted by COVID-19 they will automatically be enrolled in our Stay Connected program to help manage their unpaid balances, and we offer payment arrangements to requesting customers generally. In addition, as described below, we have provided a two-month billing credit to our Lifeline customers. It is our hope that these efforts will help customers keep their service.

However, in an effort to be responsive, specific information regarding Verizon's regulated voice accounts is provided in a **Proprietary** attachment to this letter.

4. Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.

Information regarding the number of Lifeline customers of Verizon's Commission-regulated services with unpaid balances that would normally be in Verizon's collections treatment process as of May 31, 2020 and May 31, 2019 is provided in a **Proprietary** attachment to this letter. There was a significant decrease in Lifeline accounts with unpaid balances, likely due to Verizon waiving charges for two billing cycles of Lifeline-qualified home service for customers as described below.

Verizon is also hopeful that the following initiatives will help Lifeline customers keep their service and avoid nonpayment treatment. Verizon waived the charges for two billing cycles of Lifeline-qualified home service for customers that had a Lifeline discount on a broadband or

home voice line of service as of March 22, 2020. Lifeline customers were notified of the credits with the following bill message:

ATTENTION: DO NOT PAY THIS BILL.

In this time of uncertainty, Verizon is doing everything possible to help our Lifeline customers stay connected. Verizon is providing a courtesy bill credit this month that will appear on next month's bill. To find out more about what Verizon is doing to help its customers during the Coronavirus pandemic, visit: [verizon.com/about/news/our-response-coronavirus](https://www.verizon.com/about/news/our-response-coronavirus).

In addition, Verizon made a new broadband discount program available to new Fios Internet customers who qualify through the Lifeline program. Customers may select any Verizon Fios speed in our Mix & Match plans and receive a \$20 discount per month.

The FCC has issued a series of Orders to waive the program's recertification, reverification, general de-enrollment, usage requirements, and income documentation requirements through August 31, 2020 and described below.

We are hopeful that these initiatives will help Lifeline customers keep their service and avoid nonpayment treatment.

5. Provide future projections if available.

Future projections are not available.

6. 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?

Verizon does not fully understand this question. During the pendency of the Commission's Emergency Order Verizon is not terminating service for non-payment so a reconnection fee is not relevant. Verizon's fees applicable under ordinary conditions are set forth in its tariffs and product guides.

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

Verizon understands that the CAP (Customer Assistance Program) applies to energy utility service and therefore does not apply to Verizon.

8. 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?

Verizon understands that utility company hardship funds provide cash assistance to energy utility customers to help them pay their utility bills. It is not a telecommunications program and therefore does not apply to Verizon.

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

Verizon's policies and procedures to assist customers of Commission-regulated services that go beyond those required by the Commission include the following:

Under the Stay Connected Program, Verizon has created a repayment process that will go into effect at the end of June. For wireline consumer and small business customers (50 lines or less) who self-identified as being impacted by COVID-19, we will, on July 20, defer their past due balance so that their account is considered current and they can pay the balance over time. Starting on their July bill, they will be billed their current charges and 1/6 of their past due balance as current charges. (For example if they owed \$300 as of June 30, they will be billed \$50 each month over the next six months.) Assuming they pay the amount on the bill, this will continue for six months. If they choose to pay more than their current bill, the additional amount will be applied to their deferred balance, and the future payments over the remaining six months will be smaller. If a customer misses a payment, they will be put into business-as-usual collections processes. Customers who had not self-identified will not be put into the Stay Connected Program automatically, but they may be offered a three month deferred payment program as part of individual negotiations. If the Commission's Emergency Order is still in effect after the end of June and a customer subject to the order falls behind during the repayment program, whether included in the Stay Connected program or not, they would not be charged late fees or have their service interrupted while the order remains in place.

Additionally, for Lifeline customers, Verizon provided the two month billing credit and the internet discount described above. Verizon also complies with a series of FCC Orders regarding Lifeline that directly impact customers receiving Lifeline service. These orders, extended by the FCC through August 31, 2020, waive the program's recertification, reverification, general de-enrollment, usage requirements, and income documentation requirements. These Orders are:

Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, Order, DA 20-285 (WCB Mar. 17, 2020) (temporarily waiving Lifeline recertification and reverification requirements)

Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, Order, DA 20-354 (WCB Mar. 30, 2020) (temporarily waiving Lifeline usage and general de-enrollment requirements and directing USAC to suspend periodic reviews)

Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42, Order, DA 20-462, (WCB Apr. 29, 2020) (temporarily waiving three-month documentation requirement for subscribers to demonstrate income eligibility).

10. 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.

See Verizon’s “Stay Connected” plan and the FCC waivers for Lifeline, described above.

11. The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, thcharles@pa.gov, in the Commission’s Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

a. 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.

Verizon has extensive online resources available for consumers interested in our response to COVID-19 as well as Lifeline service. See: <https://www.verizon.com/about/news/our-response-coronavirus> as well as <https://www.verizon.com/support/consumer/account/manage-account/lifeline-discount>

Verizon has also updated our collections notices to reflect the plans outlined above. Additionally, Ronan Dunne, Verizon Consumer Group CEO, sent an email/letter to every customer on April 27, 2020, providing information about our COVID-19 response and advising that we extended our COVID-19 commitments as outlined above to June 30, 2020.

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

Customers who contact Verizon about income-qualified programs are educated about the Verizon Lifeline program. Additionally, there are on-line resources available at: <https://www.verizon.com/support/consumer/account/manage-account/lifeline-discount>

- c. **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.**

Verizon is not aware of any pending or upcoming public input hearings or similar proceedings responsive to this request.

- d. **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.**

Any changes to the Verizon Lifeline program, due to COVID-19, are outlined on customer bills as described above and by company representatives when consumers call our offices, as well as at: <https://www.verizon.com/support/consumer/account/manage-account/lifeline-discount>

- e. **If programs have been modified due to the pandemic, please provide current customer education tools and advertising so that the Commission's own customer education efforts are based on current utility programs and practices.**

Information about Verizon's COVID-19 response for all customers is available on-line at our website at: <https://www.verizon.com/about/news/our-response-coronavirus>. Information about our COVID-19 response for Lifeline customers, and the Lifeline program generally, is available at <https://www.verizon.com/support/consumer/account/manage-account/lifeline-discount>.

Everyone at Verizon understands how important it is for people to stay connected during these difficult times. We will continue to closely coordinate with this Commission and other government officials and policymakers on these issues.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Suzan D. Paiva

Cc via email: rehicks@pa.gov
thcharles@pa.gov
sdewey@pa.gov

PROPRIETARY VERIZON ATTACHMENT