BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Amendment of the	)	
Minimum Telephone Service Standards	)	Case No. 00-1265-TP-ORD
As Set Forth in Chapter 4901:1-5 of the	)	Case No. 05-1102-TP-ORD
Ohio Administrative Code	)	

COMMENTS OF CENTURYTEL OF OHIO, INC.
IN RESPONSE TO THE COMMISSION'S JULY 31, 2008 ENTRY

In response to the Commission's July 31, 2008 Entry in this matter, CenturyTel of Ohio, Inc. (CenturyTel) hereby submits its comments on the Commission's proposed changes to Ohio Admin. Code § 4901:1-5-10 ("Rule 10"). CenturyTel supports the Commission's proposed changes to Rule 10 for the reasons discussed below. CenturyTel also concurs in the comments made by the Ohio Telecom Association.

Rule 10 has been the focus of much attention since the Ohio Telecom Association (OTA) filed on behalf of its members seeking a permanent waiver from the obligations of Section B of this rule. CenturyTel supported that filing and participated in the development of the comments and concerns expressed in the waiver request. The systems change that would have been required in order to separate regulated vertical services from basic local access line service in our disconnection processes and billing systems was not simple and would require significant IT hours with resultant costs to implement. Additionally, the requirement to separate out the "primary" access line on the account, added further complexity to the required changes – again with additional costs to implement. While the Commission's May 14, 2008 Entry in this matter removed the requirement to separate out the "primary" access line, the requirement to separate the basic access line from all other regulated services was maintained. Therefore, there were still significant systems changes required.

CenturyTel met with Commission staff to try and determine if there were other methods of implementing this rule that would not require significant systems changes and the resulting costs. There are no quick fixes. In order to comply with both the Commission's rule even as modified by the May 14th Entry, and the Federal Communications Commission (FCC) Truth-In-Billing rules, the bills and disconnect notices would have to be changed to indicate to the customer which services must be paid in order to avoid disconnection. Therefore, systems would have to be changed.

As pointed out in various comments already filed in this docket, the number of customers affected by this rule change is small. The rule only applies after a customer has received a disconnect notice and makes only a partial payment. In Century's case, in any given month approximately 5% of our customers may receive a disconnect notice, the majority of them pay their past due charges, 1.5% are temporarily disconnected (service is suspended for 14 days or less), and specifically over the past 7 months, an average of 0.38% have been permanently disconnected. We are not able to determine how many of these customers may have made a partial payment, but our collections department believes that it is very few. Customers generally pay all or pay nothing. Those customers making partial payments generally do so as a result of payment arrangements made with the company.

CenturyTel is committed to working with its customers in order to maintain service and avoid disconnection. Even in those states where CenturyTel can disconnect all services even if we receive partial payment, the percentage of customers who are permanently disconnected for non-payment remains extremely low, ranging from 0.26% to 0.56%.

Conclusion

The cost of implementing Rule 10 (B) as originally written, in light of the relative few customers it would benefit, did not make sense and is what prompted the OTA's March 13, 2008 waiver request. What makes much more sense and is definitely in the public interest of the 95% of our customers who make their payments on time, is that the Commission adopt the revisions to Rule 10 proposed in the July 31, 2008 Entry. The proposed rule revision will result in a move towards more cost effective regulation and a market driven solution that places us on par with our principle competitors.

CenturyTel strongly supports the proposed revisions to rule 10 and urges the Commission to approve it as issued in the Entry issued July 31, 2008.

Respectfully submitted

/s/ Daniel R. Conway

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Summary: Comments Initial Comments Filed in Response to Commission's July 31, 2008 Entry by Daniel R. Conway, Attorney, on behalf of CenturyTel of Ohio, Inc. electronically filed by Mrs. Vickie Norris on behalf of CenturyTel of Ohio, Inc.