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February 15, 2022

Hanover County
Angela Kelly-Wiecek, Madam Chair
Chickahominy District
P.O. Box 470
Hanover, VA 23069

Dear Madam Chair Kelly-Wiecek:

I am writing in response to concerns expressed by the Hanover County. Also, I am sending an electronic copy of this correspondence, along with the attachment, to you at the following address: ackelly@hanovercounty.gov. The plan set forth in this letter addresses the County's concerns without disclosing certain information that is proprietary and thus that we are unable to reveal in a public document.

A. Outage and Reliability Issues

Significant storms and third-party damages in Hanover County during the summer and fall of 2021 created extended outages that resulted in significant impacts to CenturyLink's Mean Time to Repair (MTTR) intervals. These delays created a backlog of repair/trouble tickets that need to be complete. We are working diligently to eliminate that ticket backlog and taking steps to bring MTTR intervals within a 48-hour range, as set forth below. Ensuring the reliability of our services remains a priority and we continue to work to resolve issues reported to CenturyLink.

- Like many other companies, we face additional challenges in our daily work due to the pandemic's impact on labor and materials. We lost approximately 30% of our workforce in this area, and this reduction of installation and repair technicians in the second half of 2021, as well as other COVID impacts throughout 2021 and into 2022, resulted in a considerable loss in labor hours needed to maintain the network.
- As a result, we have moved crew hours to 6 day/9 hour shifts as overtime has been approved for all Virginia markets for repair intervals. Furthermore, extra technicians have been relocated from other states to support the area's current repair load. Contractors also are being sought to add capacity. Provided we do not encounter additional significant weather events, we expect improvement to the 48-hour MTTR range will likely be reflected in results by February 25, 2022.

- We also implemented additional training to expand the skills and increase the efficiencies of our technicians. During the spring and fall of 2021, additional training was implemented on trouble isolation, which we expect to help with our current situation.
- Finally, in August 2021, we implemented a “Good Pair Check” protocol to focus on improving customer quality and reduce repeats for all copper-based services through better line diagnostic tools. Good Pair Check is a new testing software that is now included in a technician’s testing meter. The tool provides additional and deeper analytic insights regarding the customer’s copper line quality to identify if there may be additional factors that may impact the customer’s experience with our services. This protocol has improved technician performance which has resulted in reducing repeats. This new software tool continues to be evaluated and assessed for additional analytics of our network plant.

B. Network Maintenance and Supplemental Improvements

The health of our network has been and continues to remain a priority. A proactive program was initiated in 2020 to drive additional data analytics around rehabilitation of copper plant. This investment represented additional funding, i.e., funding beyond the “regular” maintenance budget for Virginia.

We are now taking *additional* steps, as outlined in this response, to accelerate the copper rehabilitation program. These additional steps are being implemented to supplement routine network maintenance efforts aimed to address immediate concerns. Specifically:

- As noted above, the company continues its use of a proactive copper rehabilitation program. Launched in 2020, the program drives additional data analytics around rehabbing copper plant to decrease overall load. This work includes rehabbing pedestals, bonding, grounding work, and replacement of these facilities as needed.
- Our operations staff continues to work to identify copper cables with a higher-than-normal occurrence of trouble. The analysis is anticipated to be completed by February 25, 2022. This data will be used to identify cables to be rehabbed or replaced thereby resulting in fewer future customer outages. As the cable routes are tested, issues identified will be remedied. The team is currently focusing on 78 copper cables across 4 counties, impacting approximately 3,600 working lines. ***This additional copper rehabilitation commitment impacts 7 cables and 335 working lines in Hanover County.*** Additional cable and working lines relative to other counties will be impacted by this supplemental rehabilitation commitment, depending upon the analysis and need for rehabilitation.
- We understand the urgency of improving service and are committed to providing weekly updates to the Staff of the Virginia State Corporation Commission (“SCC”) as to the progress of the rehabilitation project.

- We maintain a robust program that exceeds the industry standard for pole inspection programs. Using a third-party vendor, all poles are inspected and treated individually as part of a 10-year cycle. Pole replacements are prioritized based on the potential hazard posed to public safety, personal property or degree of degradation.

As you know, Lumen and Brightspeed have a pending proceeding before the SCC. Specifically, on August 3, 2021, Apollo Global Management, Inc. (parent company of Connect Holding, LLC which will operate under the name Brightspeed) and Lumen announced an agreement that Brightspeed would acquire the assets of Lumen’s Incumbent Local Exchange Companies and all associated operations across 20 states, including the Commonwealth of Virginia. On or about August 1, 2022, and assuming all regulatory approvals have been provided, we expect those assets will transfer from Lumen to Brightspeed as the new provider across the 20 states. Given the transaction, a letter of assurance was executed and sets forth the intent of Apollo and Lumen to comply with buildout and other commitments associated with state broadband grant projects previously undertaken by Lumen. Please see the enclosed, “*Letter of Assurance of Intent to Comply with State Broadband Grant Projects Commitments.*”

C. Customer Service

During January 2022, ice storms and dispatch delays in Virginia resulted in an increased number of consumer escalations across Lumen/CenturyLink Government Affairs and Operations. We recently identified and fixed a problem the repair ticketing system that led to these delays. System issues were resolved on or before February 4, 2022.

- Reporting and process safeguards have since been implemented to avoid future occurrences. We are in contact with impacted customers to ensure any lingering issues or individual concerns are addressed.
- For immediate assistance resolving individual issues as quickly as possible, we are taking measures to encourage customers to contact the repair team through **chat support** or by using other self-help options found online at [Centurylink.com/support](https://www.centurylink.com/support) or by calling **800-788-3600**. Damaged telephone poles, wires, cable or pedestals can also be reported by calling **800-201-4099**. Other methods are also available to assist the customer experience:
 - [Service Troubleshooter](#) - run line tests and create a CenturyLink repair ticket if needed
 - [Where’s my tech](#) - check the status of a repair dispatch, reschedule or cancel a dispatch
 - [My CenturyLink](#) – manage services online, setup repairs, online chat, view/pay bill
 - Download our [My CenturyLink app](#).
 - Escalate an unresolved issue:
<https://www.centurylink.com/home/help/contact/unresolved-issue.html>

- We will continue to publicize the following processes to customers:
 - If a customer experiences an issue, it is critical they create a trouble ticket by utilizing one of the methods above. Escalations to a local government entity without creating a trouble ticket will result in delays.
 - We added a customer call back feature in December of 2021 for repair tickets to allow customers, who are waiting on hold, to elect to receive a call back from us without losing their place and the queue, to mitigate customer frustration at waiting on hold.

We value feedback from our customer and ask counties and local governments to encourage customers who seek escalations to also create a trouble ticket. This not only provides the most efficient path forward but also allows CenturyLink the opportunity to issue the customer a credit for service outages.

Finally, CenturyLink now has designated a single point of contact for escalation of trouble tickets and complaints and for responding to general questions from local governments regarding any service issue. This will better enable us to track escalations and ensure a timely update is provided for each.

D. Conclusion

Over the past several years, Lumen has made significant investments to modernize our network, to maintain strong network performance, and to enable the deployment of more broadband and increased speeds for consumers throughout the Commonwealth of Virginia. These investments have benefitted all customers, regardless of the service they use. We have done this while navigating the uncertainty of a pandemic that has impacted how we operate our business and interact with our customers. We continue to strive to provide quality services to all our customers as well as address any concerns.

CenturyLink appreciates the opportunity to address the County's concerns about the quality of service we provide to our customers in Hanover County. As always, we are happy to have additional dialogue regarding this matter at your convenience.

Sincerely,


William C. Hanchey

Enclosure

cc: Steven K. Brewer (via electronic mail: Steven.K.Brewer@lumen.com)
Terrance S. Hinkston (via electronic mail: Terrance.Hinkston@lumen.com)