

**BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Re: Rulemaking to Consider Modifications to, or)
Elimination of, the Requirement Related to)
Distribution of Telephone Books in)
WAC 480-120-251) Docket UT-120451
)
Notice of Opportunity to File Written)
Comments) RESPONSE COMMENTS OF DEX
) ONE CORPORATION (Sept. 25,
) 2012)
)
_____)

INTRODUCTION

Dex One Corporation, (“Dex One”) submits these comments in response to the Commission’s Notice of Opportunity to File Response issued on September 14, 2012 (“Notice”). Dex One appreciates the opportunity to respond to other parties and to provide additional support for amending the Commission’s Directory Rule¹ to permit the distribution of residential white pages² upon request (a/k/a “opt-in”) by a phone company customer.

I. Responses of Dex to Other Parties.

A. CenturyLink.

1 CenturyLink, in particular, raises sweeping concerns about a change that is actually overdue in Washington and has been implemented with nary a hiccup in almost 100 markets in the U.S. Its “sky is falling” position is not justified and not supportable. To start with, Dex One does not seek to impose any additional costs on CenturyLink. Rather, it is CenturyLink that

¹ WAC 480-120-251.

² As Dex One has discussed in its prior comments, the Directory Rule’s application is and should be limited to white pages directories. The market regulates yellow pages publications and the Commission lacks jurisdiction over yellow pages. *See* Comments of Dex One Corporation, ¶¶ 19-21 (May 21, 2012).

would continue to impose on Dex One the cost burden of distributing millions of residential white pages directories that will go to landfills or recycling without having been used even *once*.

2 Moreover, Dex One has consistently argued against any provisions—such as bill inserts or other costly and unnecessary notification methods—that would impose costs on CenturyLink or other LECs subject to the rule. Specifically, Dex One wishes to be clear that it does not expect CenturyLink to bear the cost of implementing processes or systems to track and fulfill customer requests for directories when upon request delivery is permitted. Dex One already has systems in place and has successfully implemented upon request delivery in a number of markets. No LEC that Dex One publishes and distributes directories for—including CenturyLink—has ever noted an increase in costs after Dex One switched to upon request. The change is essentially transparent to the LEC.

3 CenturyLink also mentions briefly that it expects to lose revenue from the change to upon request delivery of residential white pages. It fails to back that claim up with any details, experience, or quantification. Dex One believes that CenturyLink is confusing listings with publication and distribution. There will be no change to the listings that CenturyLink sells (*e.g.* extra listings or premium listings), nor to the need for customers desiring privacy to purchase unlisted or non-published service from CenturyLink. All the listings and enhanced listings will still appear in the printed directories available upon request as well as in the online publications, such as www.dexpages.com available to all with the click of a mouse.³

4 CenturyLink’s claim that the environmental savings are not that great is not even consistent with its own facts and figures. CenturyLink admits the opt-in rate is 3% (in Dex’s

³ As to CenturyLink’s suggestion that the Commission should allocate costs or revenue changes resulting from the rule amendment, Dex One and CenturyLink have a publishing agreement in place that addresses the impact of regulatory changes. Clearly the Commission does not have jurisdiction to modify the agreement.

experience it has actually been under 1%).⁴ But CenturyLink then speculates that Dex One would have to print more than that to meet potential demand. But suppose Dex One printed as much as 5% of the books as it would have for saturation delivery. That still is a 95% savings for the environment. Out of concern for the 2% overrun, CenturyLink would have Dex One continue to waste the resources to print the 97% that will go completely unused. And there is no waste or duplication in the delivery process. Dex One will integrate its deliveries of upon request residential white pages with its existing deliveries throughout the year or use the U.S. Postal Service.

5 Finally, CenturyLink suggests that opt-in should be delayed—to give consumers *over a year to contemplate their directory needs* and to submit a request for delivery of a residential white pages for the Spring of 2014. Dex One certainly wishes that consumers were so involved with their directories that they would spend a whole year thinking about one. But such is not the case with a “low-involvement product” like directories, as Dex One has already discussed in its prior comments.⁵ Consumers will request a residential white pages when they need one, not a year in advance. Neither CenturyLink nor Public Counsel has been able to point to a single market out of close to 100 that have switched to upon request where there was any reported customer confusion that would justify delaying implementation for an entire year.⁶

⁴ See also Exhibit 1.

⁵ See Comments of Dex One ¶¶ 17-19 (August 20, 2012).

⁶ Likewise CenturyLink’s speculation that the low opt-in rate may be due to ineffective notice is belied by the lack of complaints or public outcry.

A. Public Counsel.

6 Public Counsel (and CenturyLink and WITA⁷) suggests that the Commission should adopt an opt-out rule, rather than opt-in. Public Counsel appears genuinely concerned that some customers may somehow fall through the cracks. With all due respect, Dex One, SuperMedia, and AT&T have extensive track records in moving to upon request delivery of residential white pages. In every market it has been a “non-event.” Consumers who value printed directories are likely to see the notice of upon request on their yellow pages delivery bag. If they miss that, they will see the notices when they are looking for a residential listing in a print directory and go to their “phone book,” which will now consist of the yellow pages, government listings, emergency information, and business white pages. The concern of Public Counsel, while sincere, is simply not a problem in the real world and does not justify continued saturation delivery, not even for one more year.

7 Public Counsel recommends additional regulations regarding the government listings or “blue pages.” Dex One always includes the blue pages in the yellow pages directories when it switches to upon request delivery of residential white pages. This is, in large part, a market-driven decision. The blue pages are a very popular section of the directories. Dex One is highly motivated to promote yellow pages usage, as this is what drives its revenues. So while Dex One is in agreement with Public Counsel that the blue pages should move to the yellow pages once white pages switch to upon request delivery, Dex One does not see a need for specific rule language, given the market demand for such a section.

8 Public Counsel suggests various other conditions on a move to opt-in which are simply not necessary and could lead to unintended negative consequences for the public. For example,

⁷ WITA expresses concern over the impact on small companies. Dex One’s “co-bound” solution would effectively address WITA’s concerns, as WITA tacitly acknowledges.

there is no need to spell out the “free” requirement. It is implicit and understood from the context of both the current rule and the proposed amendments. *See* WAC 480-120-251(3)(“the LEC must, upon request, provide at no charge a copy of the directory”—unchanged in proposed amendments). Nor is data reporting necessary as was required in New Jersey.⁸ Unlike in New Jersey and other early states, there has now been three years of win-win experience in dozens of markets. Washington will not be embarking on an untested experiment that requires close monitoring.

B. Frontier.

9 Frontier agrees with Dex One that opt-in should be allowed, but not be made mandatory. Frontier also proposes a more flexible and less costly alternative to the bill insert notice proposal. Dex One is in agreement with Frontier’s recommendations substantively. The bill insert issue is discussed further in the next section.

C. Sightline Institute.

10 Sightline Institute strongly supports the Proposed Rule, which would mandate opt-in. Sightline does not cite any other state that has gone all the way from mandating saturation delivery to a regulation mandating opt-in on a statewide basis. Again, Dex One is concerned about the “one-size-fits-all” approach. Residential White Pages opt-in should not be mandatory in smaller communities, although Dex One’s proposal would effectively make it mandatory in the largest cities. Sightline’s further suggested requirements of multiple bill inserts, data

⁸ Dex One attempted to obtain the reports from New Jersey, but they were filed under seal. Dex One understands that LEC directory assistant calls have dropped dramatically in each of the last few years, in part due to the same market dynamics that have wiped out demand for residential white pages and in part due to “FREE411” type services. In the face of such overwhelming and unrelated trends, such LEC directory assistance calling data is not likely to be of any use to the Commission.

reporting, and other minutia are not necessary for reasons Dex One has already discussed elsewhere in these comments and prior comments.

11 As Dex One discussed in its prior comments, bill inserts are an expensive but relatively ineffectual way to notify customers of the switch to upon request delivery of residential white pages, because they are not contextual. *See* Comments of Dex One ¶¶ 20-21 (August 20, 2012). Sightline would have LECs insert millions of pieces of paper into 100% of the LEC bills on a subject of interest to perhaps 1-2% of the LEC customers. When a consumer is dealing with their phone bill, they are not likely to be thinking about their directory preferences. In contrast, Dex One would put the notice on materials that are already being produced, already being distributed, and are desired and used by at least 70% of households; *i.e.* the yellow pages. And when consumers turn to their yellow pages, they are absolutely thinking about directories.

12 Another key reason for not using telecom bill inserts is that it is not a comprehensive way to cover the market. Dex One’s method of messaging about the change to residential white pages delivery on and around the yellow pages directory reaches any household that receives directories, regardless of what telecom provider that household chooses to utilize. Bill inserts would only reach those consumers who receive phone bills from regulated LECs. They would not reach cell phone only or VoIP households, which is at least 34% and possibly 40-50% of the households in larger cities in Washington.

D. WITA.

13 WITA supports opt-out over opt-in—as does its largest member, CenturyLink—claiming that customers are “highly motivated to make the choice to opt-out.” Like CenturyLink, WITA offers no support for this conclusion. The available data overwhelmingly demonstrate that this belief is not true. *See* discussion at ¶ 25, *infra* (nationally, opt-out rate is less than 1%). WITA

shares a concern of Dex One regarding the costs, inefficiency, and lack of benefit in mandating opt-in in small markets. WITA apparently supports some version of the “co-bound” provision that Dex One has suggested.

II. Response to Commission Questions.

14 Dex One appreciates the Commission seeking further comment and evidence regarding the issues that are at the heart of the key disagreements among some of the commenters. The positions of some parties in this docket are not well-founded, so requiring the parties to provide support will help the Commission weed out the weaker comments.

1. What has been the experience in other states that have adopted either an opt-in or opt-out program for the distribution of directories?

15 Initially—and while Dex One has perhaps belabored this point—it is important in any discussion of “directories” to distinguish between yellow pages and residential white pages, because yellow pages are still used by over 70% of households while less than 5% of households in metropolitan markets still use the residential white pages.

a. How was the transition implemented (e.g., by flash cut or phased in, and if phased in, over what period of time)?

16 Dex One is not aware that any market did a “phase-in” from saturation delivery to upon request delivery of residential white pages. In every one of the nearly 100 markets with which Dex One is familiar either the LEC or publisher made the decision and implemented it in a market, to coincide with the normal publication schedule for that market. Typically, the public was notified in the manner that Dex One proposes; *i.e.* on and in conjunction with the yellow pages directory.

17 There have been some states where there was a “flash cut,” but on a *trial* basis in selected markets. For example in Texas AT&T was allowed to trial upon request in Austin and later

was allowed to move to upon request statewide. *See* Tex. Utilities Code § 55.204. But to Dex One’s knowledge, nowhere did a state require a year-long notice/transition period as CenturyLink and Public Counsel are suggesting.

b. How were/are consumers notified of their option, and what is the number and nature of complaints that have been received about the programs?

18 In its markets, Dex One has notified the public of the change in the manner that Dex One proposes in this docket; *i.e.* on and in conjunction with the yellow pages directory. Dex One is unaware of any complaints to the regulators in those markets, and has received a negligible⁹ number of complaints of any kind. For example, there was one complaint by a consumer in Tucson who felt they were on hold too long when they called Dex One’s toll-free number to request a white pages. But Dex One is not aware of complaints by consumers that they could not figure out how to obtain a copy of the residential white pages after the switch to upon request delivery. The contextual notice Dex One employs is plainly working.

19 More broadly, many states have several years of experience with upon request. For the most part the markets involved in the transition to upon request have been larger metro markets with a million or more residents. In such large markets, if even one-tenth of one percent of consumers were so confused, misled, or unable to make the transition due to the “flash cut” approach that they complained to the publisher(s) or regulators, that would mean 1,000 or more complaints. Whatever the number would be, in such large markets it would be sufficient to get noticed and regulators would likely take responsive action. No such complaint history can be found anywhere.

⁹ For example, the recent White Pages complaint rate in a Dex One market was approximately two-one thousandths of a percent, and none of the complaints involved the adequacy of Dex One’s notice.

20 Dex One is aware of at least 20 states that have permitted LECs or publishers to move to upon request delivery of residential white pages on a “flash cut” basis, going back to 2009.¹⁰ Additionally, at least 12 states do not have regulations that require saturation delivery of directories,¹¹ and LECs/Publishers in a number of those states cut to upon request delivery without need for state commission action. Out of roughly 30 states that have up to three years of experience with upon request, not a single state commission has had to revisit the “flash cut”, step up the notice requirements, take any corrective action, or adopt new regulations where none existed as a consequence of the change to upon request. The transition has been as smooth as could possibly be expected—given the tens of millions of consumers affected—everywhere it has occurred. And in the states where upon request was done pursuant to a rule variance, if there had been a problem the variance would have been revoked. That has not happened anywhere.

21 Regarding Austin and Atlanta, the Florida Public Service Commission observed that, “AT&T Florida also reported that only four complaints were received from Austin, Texas subscribers concerning the after-hours automated ordering system for the residential white pages directory, and only one complaint had been received about eliminating the up-front delivery of the residential directory. AT&T Florida reported no complaints from Atlanta subscribers.”

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<http://www.psc.state.fl.us/library/FILINGS/09/06841-09/06841-09.pdf>).

¹⁰ California, 10-C-0215; Delaware, 10-002; Georgia, 30569; Illinois, 07-0434/1-0668; Indiana, 170 IAC 7-1.1-9 repealed; Kentucky, 2009-00480; Louisiana, R-31825; Michigan, MCLS § 484.2309; Minnesota, P-405,407/AM-12-140; Missouri, IE-2009-0357; New Jersey, TO10040255; New York, 10-C-0215; North Carolina, P-55, Sub 1767; Ohio, 09-0042-TP-WVR/08-1197-TP-WVR; Oklahoma, O.A.C. § 165:55-7-1; Pennsylvania, P-2010-2198820; Texas, Tex. Utilities Code § 55.204; Virginia, PUC-2010-00046; Wisconsin, 6720-GF-108; Wyoming, 090082-TL, 110209-TP.

¹¹ Arizona, Connecticut, Delaware, District of Columbia, Massachusetts, Nevada, North Dakota, Oregon, South Dakota, Utah, Vermont, and Wyoming (Source: Local Search Association).

22 Dex One has also researched media reports regarding changes to upon request delivery. Most are generally positive. And not one of the articles mentioned any complaints by consumers who failed to understand the need to request residential white pages or failed to understand how to request the white pages. *E.g.*, Julie Bykowicz, *R.I.P. white pages, state legislature says*, Baltimore Sun (March 28, 2011)¹²; *Verizon Drops White Pages Delivery in 5 States*, CBS News (November 5, 2010)¹³; Melissa Bell, *Farewell phone books? Residential white pages fading out*, Washington Post (November 11, 2010)¹⁴; Rebecca Kern, *Some companies to stop delivering printed White Pages*, USA Today, (April 29, 2009)¹⁵.

c. What has been the success rate separately for opt-in programs and opt-out programs in reducing the number of distributed directories?

23 Dex One stresses that it does not define “success” as reducing the number of directories delivered to as close to zero as possible. Dex One urges the Commission to consider a program a “success” if it results in directory distribution in a manner and in quantities that most closely match consumer needs and demands. Dex One does not consider it a success for consumers to be frustrated or confused regarding any of its directory products.

24 **Opt-out:** Based on the foregoing definition of “success,” and focused on residential white pages (versus yellow pages), opt-out programs have been unsuccessful in all markets despite their existence for a number of years in numerous markets. As detailed in Dex One’s August 20, 2012 comments, the gap between consumer demand for residential white pages and opt-out rates is over 90%. According to the Local Search Association (LSA), the national opt-out rate across all publishers who participate in the LSA’s opt-out program is less than one

¹² Available at:

http://weblogs.baltimoresun.com/news/local/politics/2011/03/rip_white_pages_state_legislat.html.

¹³ Available at: <http://www.cbsnews.com/stories/2010/11/05/business/main7026219.shtml>.

¹⁴ Available at: http://voices.washingtonpost.com/blog-post/2010/11/farewell_phone_books_residenti.html

¹⁵ Available at: http://www.usatoday.com/money/industries/telecom/2009-04-28-whitepages_N.htm

percent.¹⁶ Opt-out programs do not come anywhere close to matching directory distributions to consumer usage or need.

25 **Opt-in:** In contrast, opt-in has been very successful at matching distribution rates to estimated usage rates specifically for residential white pages. The most comprehensive data that Dex One has been able to locate is a table that AT&T filed last year with the Alabama PSC. A copy of the table is attached hereto as Exhibit 1. It shows AT&T's residential white pages request counts and percentages for up to three years in some markets. In Year 1 they are generally between one and five percent. Note that in the markets that switched to upon request for residential white pages more recently (toward the bottom of the table), the request rates are generally lower. Note also in markets with upon request for residential white pages in more than one year, the request rates have dropped substantially, year over year. Year 2 was down 38%, on average, and Year 3 was down an additional 51% from Year 2, on average. What these trends show is *not*—as CenturyLink argues (without support)—that consumers cannot figure out how to order a residential white pages. Rather, the figures and trends prove that consumer demand for residential white pages has eroded substantially since the 2008 Gallup survey and is quickly approaching zero.

¹⁶ The sole notable exception is Seattle, where up to 20% of households are reported to have opted out of both white and yellow pages. But the program, which Seattle Public Utilities administers, was heavily promoted with a very expensive campaign—several direct mails, plus TV and Radio ads. And outside of Seattle, opt-out is a lot less—under 5% statewide in Washington. And while Seattle's program got close to the demand level for yellow pages, it still is nowhere close to the much lower demand for the residential white pages.

2. With respect to the proposal to amend the proposed rule to treat service areas with “co-bound” white and yellow page directories differently than service areas with stand-alone white pages directories, please provide the following information:
 - a. The number of Washington service areas in which co-bound directories currently are being distributed.

26 Dex One publishes 34 directory titles in Washington. *Currently, all* of the directories are co-bound.¹⁷ However, when the Directory Rule is amended to permit upon request delivery of residential white pages—or require upon request delivery of non-co-bound residential white pages—Dex One will separate the residential white pages and yellow pages¹⁸ into two books for five of its titles: Seattle, South King County, Clark County, Tacoma/Puyallup, and Greater Eastside (Bellevue). Dex One does not see its other 29 titles—including Spokane or Bellingham—as viable upon request markets for residential white pages at this time. This judgment is based in part on market demographics and demand and in part on the sizes of the directories.

27 Dex One believes that all the directories of all the other LECs and publishers in Washington are currently co-bound. Dex One does not know what plans those other publishers may have regarding co-binding if the Directory Rule is changed. As a practical matter, if the proposed rule continues to mandate opt-in for residential white pages without exception, most LECs and publishers will be forced to separate their residential white and yellow pages directories to meet the much greater demand for yellow pages and to eliminate the threat to yellow pages revenues that opt-in would pose. As WITA points out, and Dex One strongly

¹⁷ Seattle used to have a stand-alone white pages. But as the white pages have shrunk due to “cord-cutting,” it became possible to co-bind it with the yellow pages.

¹⁸ Plus government listings (blue pages), emergency information, phone service pages, business white pages, and certain other reference materials.

agrees, this would be very costly, inefficient, and upsetting to consumers in smaller communities.

b. The total number distributed to customers in Washington of :

i. *Co-bound directories;*

28 Assuming the Commission adopted Dex One’s recommendation to exempt co-bound directories from mandatory opt-in, as discussed above, Dex One would continue to co-bind 29 of its directory titles in Washington. Based on the numbers of the most recent editions distributed in the last year, that would result in distributions of a bit over 1.7 million combined white/yellow pages directories. But although the numbers of directories are large, the volume is relatively small. Most of them have fewer than 100 pages (50 sheets of paper) of residential white pages.

ii. *And stand-alone white pages directories.*

29 Again assuming the Commission adopted Dex One’s recommendation to exempt co-bound directories from mandatory opt-in, as discussed above, Dex One would create separate or “stand-alone” residential white pages directories for five of its titles in Washington: Seattle, South King County, Tacoma/Puyallup, Clark County, and Greater Eastside. Based on the numbers of the most recent editions distributed in the last year, that represents over 1.2 million residential white pages—if the Directory Rule continues to mandate saturation delivery. If the Directory Rule is changed, in the markets for these five titles demand is estimated to be one to two percent or less. So, the distributions of residential white pages could be reduced from 1.2 million volumes to just 25,000 or less for these five titles alone.

30 As can be seen, the environmental and cost savings of an opt-in rule will be massive, even if it is made optional for co-bound directories, as Dex One proposes. Specifically, Dex One estimates it could forego printing and distribution of over 1.2 million of the most massive

residential white pages in the state, saving hundreds of millions of pages that would otherwise have to be printed and distributed under the current Directory Rule. The “co-bound solution” will realize substantial environmental and cost savings, while permitting smaller markets with relatively little environmental savings and no cost savings potential to continue with saturation delivery.

- c. Please provide examples and results from other states where co-bound directories are or were treated differently than stand-alone white pages directories.

31 To Dex One’s knowledge no other state has modified its saturation delivery rule so that there is a distinction between co-bound and stand-alone directories. Dex One proposed this unique compromise to address the apparent demands of environmental interests and some legislators in Washington state to make opt-in mandatory, but without adversely affecting the public interest in smaller communities in various way as discussed in Dex One’s prior comments. *See* Comments of Dex One ¶¶ 10-15 (August 20, 2012). Other states have avoided such problems simply by giving LECs and their publishers the discretion to switch to upon request delivery as, when, and where they see fit. In other words, other state commissions have taken a more deregulatory and flexible approach, rather than replacing one mandatory regulation with an alternative mandatory regulation.


32 Although there is no precedent for a distribution rule that distinguishes between co-bound and stand-alone directories, it is a simple solution that gives LECs and publishers reasonable flexibility in smaller markets. And it is easy to monitor and enforce, since a co-bound book is readily identifiable to the public, the Commission, and the industry.¹⁹

¹⁹ This contrasts with a rule that might be tied to the number of directories or the number of LEC access lines, which are not readily apparent and might be proprietary.

CONCLUSION

33 For the foregoing reasons and the reasons set forth in its prior comments, Dex One encourages the Commission to clarify the scope of the rule and soften the Proposed Rule for rural markets, consistent with Appendix A, and proceed with adoption in October, as is now scheduled.

Respectfully submitted,



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APPENDIX A

WAC 480-120-251 Directory service. (1) A local exchange company (LEC) must ensure that a telephone directory is regularly published for each local exchange it serves, listing the name, address (unless omission is requested), and primary telephone number for each customer who can be called in that local exchange and for whom subscriber list information has been provided.

(2) Any residential customer may request from the LEC a dual-name primary directory listing that contains, in addition to the customer's surname, the customer's given name or initials (or combination thereof) and either one other person with the same surname who resides at the same address or a second name, other than surname, by which the customer is also known, including the married name of a person whose spouse is deceased.

(3) A LEC must provide (~~each customer~~) a written copy of the directory for the customer's local exchange area to each customer who requests a directory. A LEC must not provide a written copy of the directory to any customer who does not request a copy; provided that a written directory that is physically bound together in the same publication with a business classified directory, such as yellow pages, may be delivered to customers who do not explicitly request not to receive a directory;

(a) A LEC must establish reasonable ways by which a customer may request a directory including, but not limited to, making all of the following options available:

(i) Calling a toll-free telephone number;

(ii) Submitting a written request via e-mail or on-line registration; or

(iii) Mailing a written request to a specified address.

(b) A LEC must provide reasonable notice to customers describing the ways by which they may request a directory including, but not limited to, all of the following forms of notice:

(i) ~~Providing the information in at least one bill insert each calendar year;~~

(ii) ~~Maintaining the information in a prominent place on the LEC's web site; and~~

(iii) ~~Including the information in the consumer information guide required in subsection (6) of this section.~~

(c) If the directory provided for in subsection (1) of this section does not include the published listing of all exchanges within the customer's local calling area, the LEC must, upon request, provide at no charge a copy of the directory or directories that contain the published listing for the entire local

calling area.

(4) Telephone directories published at the direction of a LEC must be revised at least once every fifteen months, except when it is known that impending service changes require rescheduling of directory revision dates. To keep directories correct and up to date, companies may revise the directories more often than [2] OTS-4885.1

specified.

(5) Each LEC that publishes a directory, or contracts for the publication of a directory, must print an informational listing (LEC name and telephone number) when one is requested by any other LEC providing service in the area covered by the directory. The LEC to whom the request is made may impose reasonable requirements on the timing and format of informational listings, provided that these requirements do not discriminate between LECs.

(6) Telephone directories published at the direction of the LEC must include a consumer information guide that details the rights and responsibilities of its customer. The guide must describe the:

(a) Process for establishing credit and determining the need and amount for deposits;

(b) Procedure by which a bill becomes delinquent;

(c) Steps that must be taken by the company to disconnect service;

(d) Washington telephone assistance program (WTAP);

(e) Federal enhanced tribal lifeline program, if applicable; and

(f) Right of the customer to pursue any dispute with the company, including the appropriate procedures within the company and then to the commission by informal or formal complaint.

(7) As used in this section, “directory” means a published compilation of names and numbers of LEC customers organized alphabetically or by phone number, but does not include compilations of business names, numbers or advertising classifications in publications that also include advertising in the listings, such as yellow pages or similar publications.

EXHIBIT 1

RESIDENTIAL WHITE PAGE CONSUMER CHOICE
Number of Books Requested by Market

EXHIBIT 1

RWPPC Markets	Year 1			Year 2			Year 3		
	% Books Requested*	Total # Book Requested	% Books Requested*	Total # Book Requested	Percent decrease in Requests in Year 2	% Books Requested*	Total # Book Requested	Percent decrease in Requests in Year 3	
02 - Atlanta	2.06%	18,999	1.88%	17,362	8.62	0.74%	6,841	60.61	
11 - Austin	2.49%	18,733	1.35%	10,122	45.97	1.13%	8,476	16.01	
06-Jacksonville	4.66%	24,516	2.49%	13,109	46.53	0.91%	4,764	63.48	
07-Cleveland	2.51%	24,208	3.57%	34,508	(42.36)	1.22%	10,563	65.86	
09-West Palm	2.20%	9,690	1.52%	6,697	30.91				
09-Columbus	1.89%	16,290	1.03%	8,877	45.50				
09-Charlotte	4.19%	21,754	2.42%	12,555	42.24				
09-Oklahoma City	2.81%	13,737	2.05%	10,019	27.05				
09-Ft Worth	1.59%	7,201	1.57%	7,094	1.26				
10-Milwaukee	2.34%	22,349	1.48%	14,089	36.75				
10-San Antonio	2.56%	16,516	3.08%	19,830	(20.31)				
10-Miami	2.91%	25,483	0.87%	7,601	70.10				
11-Indianapolis	1.88%	17,482	2.46%	22,873	(30.85)				
11-Central Fl	2.77%	12,865	0.58%	2,708	79.06				
12-St Louis	6.79%	22,038	3.50%	11,367	48.45				
01-Kansas City	1.92%	18,946	0.52%	5,120	72.91				
01-Daytona	2.60%	4,864	1.44%	2,697	44.62				
01-Deland	0.65%	701	0.25%	264	61.54				
01-Greensboro	5.34%	14,543	1.96%	5,336	63.30				
02-Madison	3.88%	15,944	1.25%	5,120	67.78				
02-Toledo	6.86%	28,428	4.39%	18,191	36.01				
03-Racine/Kenosha	6.48%	12,916	1.46%	2,920	77.47				
03-Dayton, OH	4.03%	20,078	2.77%	13,800	31.27				
04-Raleigh	5.14%	19,470	1.51%	6,706	70.62				
04-Evansville	4.62%	11,958	1.48%	3,835	67.97				
04-Youngstown	4.90%	15,294	1.42%	4,427	71.02				
05-Michiana	1.99%	17,501	1.34%	4,802	32.83				
05-N Smyrna Bch	0.52%	331	0.15%	71	70.88				
06-Mobile	5.15%	15,621	7.51%	18,239	(45.90)				
07-Winston-Salem	2.31%	6,112	1.64%	4,021	29.00				
08-Chapel Hill	1.06%	2,328							
09-Fox Cities	9.06%	19,687							
09-Louisville	0.69%	3,590							
10-Stuart	1.69%	5,120							
11-Indy North Sub	0.30%	825							
					Avg % decrease in requests Year 2 over Year 1			Avg % decrease in requests Year 3 over Year 2	
					38.01			51.49	

EXHIBIT 1

11-Indy South Sub	0.29%	483
11-Indy East Sub	0.31%	382
11-Indy West Sub	0.29%	519
11-Pensacola	2.48%	7,444
12-Green Bay	10.19%	24,519
12-Memphis	0.50%	2,579
12-Tulsa	1.55%	9,269
01-Dallas	0.90%	4,240
01-Gainesville, FL	0.91%	1,917
01-Akron	1.59%	6,687
01-Waukesha	0.60%	1,326
01-Washington, WI	1.47%	1,078
01-Ozaukee Cty	0.56%	682
02-Columbia-Lexington	3.53%	13,897
03-Broward Cty	0.36%	5,248
03-Houston	2.63%	15,206
07-Chattanooga	0.55%	1,482
07-Nashville		
09-Palm Cty		
12-Grand Rapids, MI		
02-East Area, MI		
02-Detroit, MI		
02-Little Rock, AR		
06-Gtr Gwinnett		
06-Roswell/Alpharetta		
06-Marietta		
06-Clayton/Fayette		
07-Oakland S, MI		
07-West NW, MI		
07-Saginaw, MI		
07-Oakland N, MI		
08-Lansing, MI		
08-Gtr Greenville, SC		
08-Kalamazoo, MI		
08-Springfield, MO		
08-Charleston, SC		