



Residential White Pages Upon Request Distribution Overview Washington

UT-120451: Workshop, October 18, 2012

Public Interest Issue re Traditional White Pages

- Consumer **usage** and **utility** of printed Residential White Pages has declined significantly:
 - Just 11% in 2008 per Gallup study
- **Usage**—white pages supplanted by:
 - Internet
 - Cell phone contact lists & speed dials
 - Handset auto redial and called/calling number history functions
- **Limited Utility**—residential listing declines:
 - “Cell phone only” households (now 34%) are unlisted
 - VoIP often unlisted
- **Go Green**—Increasing consumer environmental sensitivity

Contrast With Yellow Pages & Bus White Pages

- Consumer **usage** and **utility** of printed Yellow and Business White Pages has remained strong:
- **Usage**—70% of households use Yellow Pages
 - Yellow Pages are a lifeline for Local and Small Businesses
- **Utility**—from consumer perspective, nearly all businesses still listed
 - Majority of consumers still refer to print Yellow Page in addition to or instead of the Internet
- The Commission lacks jurisdiction to regulate Yellow Pages
- Yellow Pages are protected by the First Amendment
 - *Dex Media v. Seattle*, ___ F.3d ___ (9th Cir., Oct. 15, 2012)
 - Decision may make mandatory opt-in unconstitutional

Printed Residential White Pages *Upon Request* —Not New

- Significant precedent in other states for *Upon Request* delivery
- In close to 100 markets and almost 30 states over a three year period
- Experience? Win-win!
 - Almost no complaints, no organized opposition
 - Printed white pages directory request rates—single digit percentages
 - As low as under 1%
 - Studies of white pages usage were accurate, if not overstated
 - Substantial savings in costs and environmental impact

Next Step Toward Public/Private Goals and Preservation of Consumer Choice

- Printed Residential White Pages moving from “**saturation**” to “**upon-request**” model
- Printed Residential White Pages **not** being eliminated
 - Merely modifying the manner of delivery
- **Every** consumer can still request a **free** Printed White Pages
 - Call toll free “800” number
 - www.DexKnows.com/Green
 - Free delivery in a week or so
- Yellow Pages not changing

Printed Residential White Pages *Upon Request* —List of States Growing Fast

Alabama
Arizona
California
Connecticut
Delaware
Florida
Georgia
Indiana
Kentucky
Louisiana
Massachusetts
Michigan
Minnesota
Missouri

Nevada
New Jersey
New York
North Carolina
Ohio
Oregon
Oklahoma
Pennsylvania
Rhode Island
South Carolina
Texas
Utah
Virginia

STATES = 27

FAILURE RATE = 0



Dex One's Experience With Upon Request: Consumer Messaging Plan

Side 1

Looking for the Residential White Pages?



To request a free copy of the Residential White Pages, visit DexKnows.com/Green or call 877-243-8339.

Find recycling options at 1-877-2-GET-DEX or go to DexKnows.com/Green.

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Side 2

Easy-Access Information.



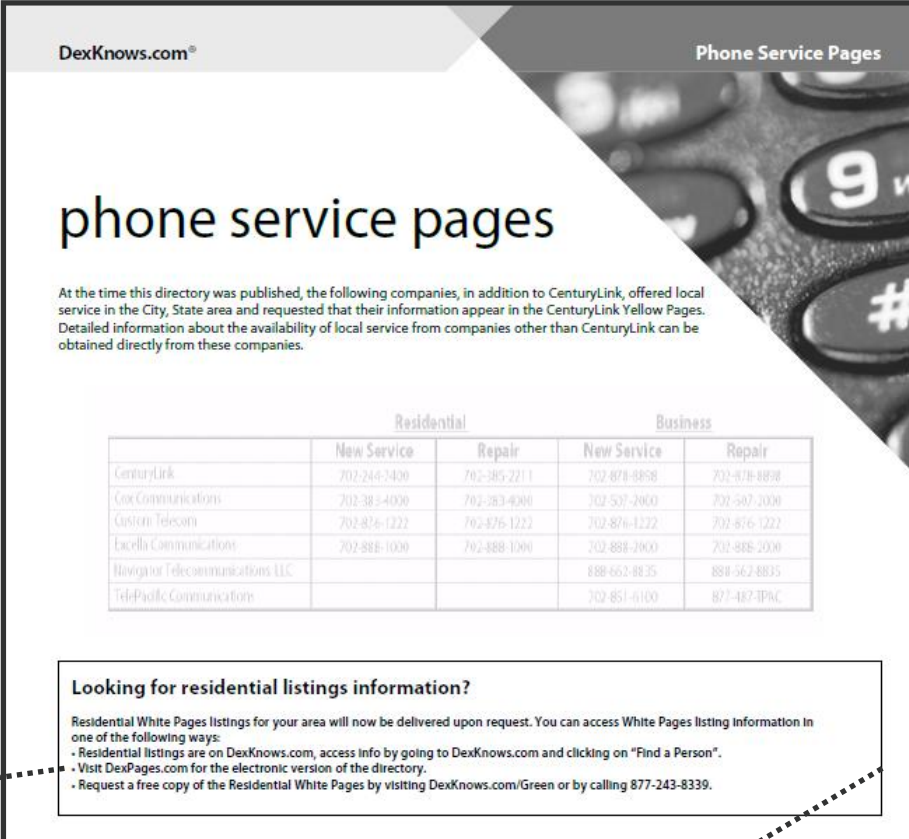
From your table top to your desktop to the palm of your hand — Dex delivers complete local info whenever and wherever you're looking.

Print | DexKnows.com® | Mobile | DexPages.com

To request a free copy of the Residential White Pages, find recycling options or stop delivery of Dex published directories visit DexKnows.com/Green or call 877-243-8339

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Dex One's Experience With Upon Request: Consumer Messaging Plan



The screenshot shows a webpage titled "DexKnows.com" with a sub-header "Phone Service Pages". The main heading is "phone service pages". Below this is a paragraph explaining that at the time of publication, several companies besides CenturyLink offered local service in the City, State area and requested their information appear in the CenturyLink Yellow Pages. A table follows, listing companies and their phone numbers for Residential and Business services, categorized into New Service and Repair. A callout box at the bottom of the screenshot provides instructions on how to access residential listings information.

DexKnows.com® Phone Service Pages

phone service pages

At the time this directory was published, the following companies, in addition to CenturyLink, offered local service in the City, State area and requested that their information appear in the CenturyLink Yellow Pages. Detailed information about the availability of local service from companies other than CenturyLink can be obtained directly from these companies.

	Residential		Business	
	New Service	Repair	New Service	Repair
CenturyLink	702-244-3400	702-385-2211	702-878-8898	702-878-8898
Cox Communications	702-383-4000	702-383-4000	702-507-2900	702-507-2000
Custom Telecom	702-876-1222	702-876-1222	702-876-1222	702-876-1222
Locell Communications	702-888-1000	702-888-1000	702-888-2000	702-888-2000
Navigator Telecommunications LLC			888-662-8825	888-662-8835
Tel-Pacik Communications			702-851-6100	877-487-3PAC

Looking for residential listings information?

Residential White Pages listings for your area will now be delivered upon request. You can access White Pages listing information in one of the following ways:

- Residential listings are on DexKnows.com, access info by going to DexKnows.com and clicking on "Find a Person".
- Visit DexPages.com for the electronic version of the directory.
- Request a free copy of the Residential White Pages by visiting DexKnows.com/Green or by calling 877-243-8339.

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Dex One's Experience With Upon Request:

- Implemented in metro areas in Arizona, Nevada, Utah
 - Affected **over one million households**
- Request rates for residential white pages?
 - Less than 1%
- Complaints to state Commissions, Consumer Representatives, AGs, other political entities?
 - **One**—wrong number calls to customer with a similar number
- Complaints to Dex One?
 - **Handful**—e.g., consumer in Tucson on hold too long
- Complaints re inadequate notice/customer confusion?
 - **Zero**

Dex One's Experience With Upon Request

Why Only Metro Areas?



Cle Elum/Easton/Roslyn
Households = 1,410

Seattle households =
280,453

1. To what extent do LEC customers rely on printed white pages directories?

- No recent survey, but usage rates are certainly well below 10%
 - Based on survey trends and request rates
- Users of printed residential White Pages have choices
 - A few customers may request and continue to use printed white pages
 - A few customers may migrate to alternatives for the first time
- Consumers are adapting and the demand for res WPs continues to decline
 - 38% decline in requests in Year 2; 51% decline in requests in Year 3
- Dex One's goal is to match distribution to usage as closely as possible
 - Not to eliminate as many residential white pages as possible

2. Would an “opt-in” requirement provide sufficient protection for customers who continue to need or want printed white pages directories?

- Experience with upon request in almost 30 states and about 100 markets over the course of 3+ years now
 - A few states have imposed stringent conditions
 - Most states have let LECs and publishers work out the details
- A number of states never regulated distribution
- There is no evidence complaint rates are any higher in states with no conditions or no directory regulations
- Complaints have been minimal to non-existent
- No known complaints in any state regarding notice of the need to request Res WPs

3. Would the costs of an “opt-in” requirement outweigh the benefits?

- In smaller and rural markets this is the case
- In larger, metro markets, the cost savings can be considerable
- By making opt-in optional, the LEC (or its publisher) can ensure that upon request is implemented when the market is ready and only when the benefits outweigh any costs
 - Note: Dex One’s LECs bear no costs for the distribution of res WPs
- Dex One’s “co-bound” recommendation effectively makes opt-in optional

4. Would an “opt-out” requirement significantly reduce the number of unwanted printed white pages directories?

- Dex One and the directory industry already have voluntary opt-out programs, so no requirement is necessary.
 - Dex One, an industry leader, introduced opt-out in 2008
 - The industry’s opt-out site (www.yellowpagesoptout.com) began in 2010
 - Dex One promotes both programs on directory covers and inside
- Upon-request (opt-in) delivery model matches the low usage of residential White Pages better than opt-out
 - An estimated **90%+** of people do not use residential White Pages
 - However, the national opt-out rate is about **1%** (combined across all directories)
 - Even in WA, the opt-out rate for Dex One is only about **5%**

5. Should the Commission adopt a different distribution requirement for white pages directories that are bound with yellow pages than for white pages directories bound separately from yellow pages?

- This is one way to give LECs and publishers the flexibility to adapt distribution methods to individual markets
- Publishers would continue to configure their directories to address consumer and advertiser needs
- Today's co-bound directories could be split in the future based on consumer demand and usage

6. Should the Commission adopt an “opt-in” requirement only after a transition period?

- Directories are a “low involvement” product
- People think about directories when:
 - They receive them
 - They need to look up a listing
- Advance notice of a switch to upon request is not effective, including:
 - A year ahead on the “last” WPs
 - Bill notices
 - Bill inserts
- “Contextual” notice is most effective
 - On, in, and around the directory—the Yellow Pages

Questions? Follow up?

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