

1 A. No. Directory publishers like Donnelley generally pay the FCC-approved rate of  
2 \$0.04 per listing (and \$0.06 for updated listings) for each listing.<sup>20</sup> That practice  
3 appears to be consistent with industry practice. My concern is that Embarq is  
4 attempting to generate additional revenue by imposing these storage charges upon  
5 competitors, and thereby gaining revenue from both “sides” of the directory  
6 database process. Embarq’s policy is to charge facilities-based competitors a  
7 “storage” charge for each customer listing submitted by a competitor on the “front  
8 end,” and Embarq likely also charges directory publishers on the “back end” for  
9 the compilation of all listings.

10 **Q. HAS EMBARQ EVER PROVIDED ANY DATA TO DEMONSTRATE**  
11 **THESE RATES ARE COST-JUSTIFIED?**

12  
13 A. No, to my knowledge, Embarq has never provided cost-justification for its  
14 monthly directory storage fees. It is reasonable to assume that any such costs  
15 which Embarq may incur to include such listings in its database have already been  
16 recovered by the sale of competitors’ listings to directory publishers and directory  
17 assistance vendors.

18 **Q. HAS CHARTER ATTEMPTED TO OBTAIN ADDITIONAL**  
19 **INFORMATION REGARDING THESE PRACTICES?**

20  
21 A. Yes. In light of Charter’s concerns with these practices, Charter asked both  
22 Qwest and CenturyLink basic questions about their respective directory services  
23 practices. Specifically, we asked them to identify the vendors they use for  
24 directory assistance and directory listing service to end user customers and

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<sup>20</sup> *SLI/DA Order* at ¶ 98.