

**BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Re: Rulemaking to Consider Modifications to, or)	
Elimination of, the Requirement Related to)	Docket UT-120451
Distribution of Telephone Books in)	
WAC 480-120-251)	SUPPLEMENTAL
)	COMMENTS OF DEX ONE
Notice of Opportunity to File Written)	CORPORATION RE SECOND
Comments Issued March 1, 2013)	SUPPLEMENTAL CR-102
)	

SUPPLEMENTAL COMMENTS OF DEX ONE CORPORATION

Dex One Corporation (“Dex One”) files these supplemental comments in support of the proposed rule amendments and in brief response to the comments filed by CenturyLink, Frontier, and WITA on March 29, 2013. Frontier and WITA both express concerns about the intended scope of the listings that LECs must make available on their websites under Subsection (2) of the proposed amended rule and—if interpreted broadly—the ability of LECs to obtain access to listings of neighboring LECs where local calling areas cover multiple LECs service areas. Each commenter proposed further revisions to the proposed rule to address the potential practical concerns.

Dex One is not unsympathetic to the LECs’ concerns and is not opposed in principle to a minor clarification of the subsection. However, Dex One would be opposed to any action that would delay adoption of the final rule for yet a third time for the reasons discussed in its March 29, 2013 comments. While it may be the case, Dex One does not presume the rule would be interpreted as the LECs suggest, that the LECs would be unable to readily comply, or that they could not obtain waivers to the extent they faced any compliance issues.

While the need for further revisions to the proposed rule is not clearly established, and therefore should not delay final rule adoption, Dex One could nevertheless support a minor clarification so long as it does not require a further supplemental CR-102 notice. Frontier's proposal comes closest to the type of clarification that should not require a further notice. Dex suggests a minor addition to provide additional clarity:

A LEC must ensure that its basic local exchange service customers have access to directory listings ~~for the~~ of its customers' for their local calling areas by making those listings available electronically via a document, data base, or link on the LEC's web site. The LEC also must distribute or arrange to distribute printed directory listings to all of the LEC's customers who request a printed directory. A LEC is not otherwise required to distribute a printed directory.

Under Dex One's proposal, LECs would not have to post listings of other LECs. Instead, the LECs—and the public—could rely on the fact *all* the listings in the state¹ would be posted on the website under the rule by at least the serving LEC.²

CenturyLink's comments are irrelevant and unfounded. First, so long as CenturyLink complies with the law and does not provide unlisted or non-published information of its customers to Dex One and other directory publishers, the publishers will not be able to put that information online.³ CenturyLink's second comment about businesses relying on business white pages as a source of revenue is confusing. To the extent business white pages are generating revenue for advertisers, that reflects there is still usage and therefore market demand for them. It

¹ Except for listings of customers requesting non-published listing service.

² If a customer did not initially find a local listing on their own LEC's website, a Bing, Google, or other search for the name would quickly pull up the listing of another LEC or a non-telco affiliated listings website, of which there are many.

³ Websites do acquire and publish data from numerous sources other than LECs, which may in some cases include the same information that the LEC treats as unlisted or non-published. These other, non-LEC, information sources and websites are, of course, outside the Commission's jurisdiction in any event.

is for precisely this reason that Dex One plans to continue to distribute business white pages co-bound with the yellow pages for the foreseeable future.

Conclusion

For the foregoing reasons and the reasons set forth in its prior comments in this docket, Dex One urges the Commission to adopt the Proposed Rule as published with the Notice or with the revisions suggested above by no later than April 11, 2013.

Respectfully submitted,



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