

1 A. Primary Directories are those directories published on behalf of QC to meet its  
2 Washington regulatory obligations. They include Qwest, independent local  
3 exchange company (“ILEC”) and CLEC listings within Qwest exchanges.

4 **Q. HOW DID QWEST APPORTION LISTINGS IN THE PRIMARY**  
5 **DIRECTORIES BETWEEN QWEST AND NON-QWEST LISTINGS?**

6 A. Qwest apportioned listings in the Primary Directories between Qwest and non-  
7 Qwest listings. Non-Qwest listings make up 25.6% of all the listings in Qwest  
8 Primary Directories across the region and 27.5% of the listings in Qwest Primary  
9 Directories in Washington.<sup>31</sup> The majority (90.2%) of the non-Qwest listings are  
10 ILEC listings expanding the scope of Dex publishing activities beyond QC and its  
11 customers.<sup>32</sup> Like Secondary Directories they are published at Dex's discretion in  
12 order to compete more effectively in the advertising market and to maximize  
13 advertising sales by providing directories that allow advertisers to focus their  
14 advertising message to a specific geographic scope which best represents their  
15 customer base. They serve as a focused advertising medium for both consumers  
16 and advertisers.

17 CLEC listings currently make up approximately 9.8% of non-Qwest listings and  
18 did not commence until approximately 1996. When the Commission adopted the  
19 stipulation agreement which included imputation, CLEC listings were not a  
20 consideration since they did not exist. The inclusion of CLEC listings is a  
21 requirement of the Commission Order in Docket Nos. UT-941464, et al., and

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<sup>31</sup> See Confidential Exhibit TAJ-~~3C4C~~, Qwest’s response to data request ATG-01-016S1, 2001 Listings by Directory. Approximately 708,548 (27.5%) of the listings in Washington Primary Directories are non-Qwest listings.

<sup>32</sup> *Id.* As of November, 2002, there were 69,851 CLEC listings in Washington.