1	customers. Delivery lists of the Company's customers were prepared and used in
2	the delivery of its Washington directories. As a result, the advertising included in
3	the directories published by the Company was targeted almost solely to the
4	Company customers. That is not the case today. Dex now delivers its directories to
5	every address located within the geographic scope of each of its directories. As a
6	result, the advertising Dex sells is targeted to the customers of other local exchange

7 companies as well as to QC's customers.

8 Q. DOES DEX HAVE AN OBLIGATION TO PUBLISH AND DELIVER ITS

9 **DIRECTORIES ONLY TO QC CUSTOMERS?**

- 10 A. No. As explained in Mr. Burnett's direct testimony, Dex has equivalent publishing
- 11 agreements with more than one hundred independent and competitive local
- 12 exchange carriers, in addition to QC.

13 Q. WITH HOW MANY OTHER LOCAL EXCHANGE CARRIERS DOES DEX

14 HAVE PUBLISHING AGREEMENTS IN WASHINGTON?

- 15 A. Dex currently has publishing agreements with <u>eight</u> nine competitive local exchange
- 16 carriers⁵ in Washington and <u>two</u> one incumbent local exchange carriers, Inland
- 17 Telephone Company and Midvale Telephone Exchange. Additionally, Dex has
- 18 listing agreements with <u>thirteen eleven</u> other incumbent local exchange companies
- 19 in Washington, to include their listings in Dex directories, although Dex does not
- 20 have the accompanying obligations as it does

⁵ Allegiance Telecom, AT&T, MCIMetro<u>, Ameritel/Reconex (formerly Sterling International dba 1800</u> <u>RECONEX)</u>, Now Communications, Sterling International Funding, dba 1800 RECONEX, Sprint, Teligent, Time Warner Telecom and Worldcom.