

1 and booked revenues. Published revenues are reflected in the year the directory is
2 published, rather than amortized over the life of the directory. This means that a
3 significant amount of revenue is recognized a year earlier than it is recognized on
4 the financial books of Dex. Second, published revenues reflect revenues before any
5 adjustments are reflected. Dr. Selwyn's method overstates actual booked revenues
6 and understates booked expenses. The result is a significantly overstated allocation
7 to Washington.

8 Mr. Brosch, on the other hand, adjusted the Washington allocation factor to match
9 the portion of the business that he claims should be allocated to Washington
10 customers. While I disagree with Mr. Brosch's inclusion of Secondary directories
11 and non-Qwest listings, I believe that he used the correct allocation methodology.
12 In Washington, the method for determining the directory imputation has always
13 relied on actual booked revenues because revenue is a measure that is clearly
14 identifiable by state while other measures are not. Dr. Selwyn's and Mr. King's
15 ~~Lee's~~ departure from this measurement standard is not in line with the imputation
16 standard.

17 **Q. IS THERE ANY PRECEDENT IN WASHINGTON TO SUPPORT THE**
18 **ADJUSTMENTS THAT YOU HAVE MADE?**

19 A. Yes. Staff's responses to Dex Holdings Data Requests DEXH-S001 through S009
20 relate to Contel Corporation's 1985 sale of its directory publishing subsidiary,
21 Leland Mast Directory Company. In these responses, particularly in Staff's