

1 **Q. DOES THIS MEAN THAT THE LISTING LINKAGE IS BROKEN?**

2 A. Without a doubt. However, if this Commission were to determine that listings still
3 creates a linkage between Dex and QC's customers, it could only exist with regard
4 to QC's listings. Over 25 percent of the listings published in Dex's directories are
5 not QC's listings. Obviously there can be no linkage between QC's customers and
6 listings of other telephone companies' customers. The changes in the law have
7 severed the historic linkages that existed between directory publishing and
8 telephone companies' customer listings. To the extent the Commission were to find
9 otherwise, it is still a fact that 25 percent of the listings published by Dex have no
10 relationship to QC or its customers and thus no possible linkage.

11 **Q. DOESN'T QC PROVIDE NON-QWEST LISTINGS TO DEX?**

12 A. Yes. In many cases, QC does provide non-Qwest listings to Dex and to other
13 publishers. Under the Telecom Act of 1996, as implemented through this
14 Commission's interconnection rulings, QC is required to provide CLEC listings to
15 Dex, if the CLEC so chooses. On the other hand, a CLEC may also elect to provide
16 its own SLI directly to Dex and other publishers. QC also provides ILEC listings
17 through agreements with many ILECs. In no case may Dex or any other publisher
18 publish another carrier's listings obtained from QC without agreement from that
19 carrier. Consequently, this obligation to provide non-Qwest listings to directory
20 publishers does not create a claim by Washington customers to the gain from the
21 business of advertising to non-QC subscribers.