

1 **ATG Linkage 7 – Public Perception**

2 **Q. HOW DO YOU RESPOND TO A CLAIM OF LINKAGE CREATED BY**
3 **PUBLIC PERCEPTION?**

4 A. Although Mr. Brosch has claimed this public perception exists in this and other
5 proceedings in other states, he has never offered any evidence whatsoever that it
6 actually exists or that it is helpful to Dex. Certainly, there is no reason to believe
7 that any perceived link between Dex and QC has any impact on non-Qwest
8 customers. Furthermore, if such a link were to exist, it would not exist with the Dex
9 directory users that are not QC's customers.

10 **ATG Linkage 8 – Customer Referrals**

11 **Q. PLEASE DISCUSS THE LINKAGE MR. BROSCH CLAIMS IS RELATED**
12 **TO CUSTOMER REFERRALS.**

13 A. QC's practice of referring customers to Dex did not start until May of 1998.
14 Referrals are not tracked on a state basis, but rather on a QC consultant basis for
15 reimbursement by Dex. However, it is estimated that less than ~~one-quarter~~ of one
16 percent of QC's business customers are referred to Dex on an annual basis. The
17 number of referrals is so small as to be considered inconsequential. This small
18 number of referrals does not constitute a linkage that justifies attributing the gain
19 from Dex's business to QC's customers. Even if it did, it must be remembered that
20 since over 25 percent of the listings in Dex's directories are not QC customers, there