

ATTACHMENT "1"

Washington  
Docket No. UT-021120  
WUTC 2-006I

INTERVENOR: Washington Utilities and Transportation Commission

REQUEST NO: 006I

At p. 22, lines 8-9, Mr. Grate states: "The entrance and departure of a number of directory publishers over the last twenty years is a clear indication of a competitive market."

- a. Cite all authorities in the economics literature or other sources being relied upon by Mr. Grate in support of this contention.
- b. Identify specifically by company name each and every one of the directory publishers being referred to in the cited testimony who have entered and/or departed the directory publishing business in Washington State over the last twenty years, and for each such company provide the date of entry and, where appropriate, the date of departure.
- c. Identify specifically by company name each and every one of the directory publishers being referred to in the cited testimony that are currently doing business and publishing directories in Washington State.
- d. For each directory publisher identified in (b), provide the geographic areas currently being served by each directory being published, the total number of pages in each such directory during each of the years 1998-2003 or as available, the circulation of each such directory during each of the years 1998-2003 or as available, the number of years that the directory has been in continuous publication, and the total Washington State advertising revenues being obtained by each such directory publisher during each of the years 1993-2003 or as available.

RESPONSE:

- a. Mr. Grate relied on the common meaning of "competitive" to describe "market." Webster's Ninth New Collegiate Dictionary defines "competitive" as: "relating to, characterized by, or based on competition." The entrance and departure of a number of directory publishers to and from the market indicates the market was based on competition and characterized by competition.
- b. The statement in Mr. Grate's testimony was a statement based on a general understanding of the directory advertising market in Washington, rather than referring to a specific list of directory publishers. However, Qwest has identified forty three publishers that have published directories in Washington in addition to Qwest's affiliate publisher (Dex). Eight of these forty three publishers were publishing directories in Washington in 1981 and eighteen of these forty three publishers

published Washington directories in 2002. Between 1981 and 2002 thirty five publishers are known to have entered the market and twenty five publishers are known to have exited the market. Of the original eight publishers, three still published Washington directories in 2002. Attachment "A" provides a list of the directory publishers that Qwest is aware published during this time. Attachment "A" is not considered an exhaustive list intended to identify "each and every one of the directory publishers" for the years provided. Information for the years 1987, 1988, 1991, 1992, 1993, 1996, 1997, 1999 and 2000 are not readily available without a special study and it is unknown what information may or may not be available for these years.

c. See Attachment "A" for the publishers that Qwest is aware are currently publishing in Washington.

d. Qwest does not have the number of pages, the circulation or the revenues for competitive directory publishers. Attachment "B" provides the list of directories Qwest knows to have been published by each publisher listed in Attachment "A" for each of the available years. Attachment "B" is not a complete list of all directories, but rather a list of directories known to Qwest at this time.

Respondent: Ann Koehler-Christensen, Qwest Manager