

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and Transportation Commission

v.

Verizon

Docket No. UT-040788

**RESPONSE OF PUBLIC COUNSEL, AARP AND WeBTEC TO DATA REQUESTS OF
VERIZON NORTHWEST**

Request No: 116
Directed to: Simon ffitich
Date Received: December 15, 2004
Date Produced: December 30, 2004
Prepared by: Michael Brosch
Witness: Michael Brosch

DATA REQUEST P.C. NO. 116.

At page 18, lines 1-8 of Mr. Brosch's Testimony, he uses the term "yellow pages market." Please define the term "market" as that term is used in this context. Is it Mr. Brosch's contention that "yellow pages" constitute a relevant antitrust product market? If so, please describe all studies undertaken by Mr. Brosch that support this position.

RESPONSE:

The referenced testimony passage is actually a quotation from a Simba Information Inc. document included within Mr. Doane's workpapers, as referenced in footnote 24. The percentage quoted as a "share of the yellow pages market" is believed to be based upon the percentage of revenues earned by the RBOCs and independent telcos. Mr. Brosch has formulated no "contention" with respect to whether or not yellow pages are a "relevant antitrust product market".