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October 4, 2014

Dr. Burl W. Haar

Executive Secretary

Minnesota Public Utilities Commission

Via: E-file

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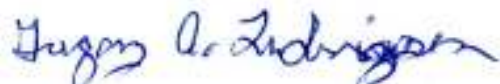
Re: The Joint Reply Comments of Qwest Corporation dba CenturyLink QC and Dex Media East, Inc. in **DOCKET NO. P-421/M-14-775**: In the Matter of a Joint Petition by Qwest Corporation dba CenturyLink QC and Dex Media East, Inc., Pursuant to Minn. Stat. § 237.081 subd. 1 for a Variance of Rules 7810.2900 and 7812.0600 Regarding the Distribution of Telephone Directories in the Territory and Exchanges Served by Qwest Corporation d/b/a CenturyLink in the State of Minnesota

Dear Dr. Haar:

Attached for filing are the Joint Reply Comments of Qwest Corporation dba CenturyLink QC and Dex Media East, Inc in **DOCKET NO. P-421/M-14-775**: In the Matter of a Joint Petition by Qwest Corporation dba CenturyLink QC and Dex Media East, Inc., Pursuant to Minn. Stat. § 237.081 subd. 1 for a Variance of Rules 7810.2900 and 7812.0600 Regarding the Distribution of Telephone Directories in the Territory and Exchanges Served by Qwest Corporation d/b/a CenturyLink in the State of Minnesota..

Please direct questions regarding this filing to Gregory Ludvigsen at 651-587-0089.

Sincerely,



Gregory A. Ludvigsen

Enclosure

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
Dan Lipschultz
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of a Joint Petition by
Qwest Corporation dba CenturyLink QC
and Dex Media East, Inc., Pursuant to
Minn. Stat. § 237.081 subd. 1 for a
Variance of Rules 7810.2900 and
7812.0600 Regarding the Distribution of
Telephone Directories in the Territory
and Exchanges Served by Qwest
Corporation d/b/a CenturyLink in the
State of Minnesota

PETITION DATE: November 4, 2014
DOCKET NO. P-421/M-14-775
JOINT PETITION FOR LIMITED
VARIANCE

**Reply Comments of Qwest Corporation dba CenturyLink QC
and Dex Media East, Inc.,**

Qwest Corporation dba CenturyLink QC (“CenturyLink”) and Dex Media East, Inc. (hereinafter “Dex Media”)(collectively “Petitioners”) jointly file these reply comments in support of their Petition for Variance (“Petition”). Petitioners appreciate the prompt Commission action in setting a comment schedule that can accommodate their request for consideration of the Petition by mid-December of this year. Petitioners also appreciate that the two commenters, the Department of Commerce (“DOC”) and Minnesota Cable Communications Association (“MCCA”), have expressed support for the variance with conditions that are largely implicit or explicit in the Petition itself.

I. The DOC Supports the Petition.

The DOC, in a very thorough and thoughtful analysis and based on investigation and informal discovery, has recommended that the Commission “[g]rant the variance subject to some or all” of nine conditions “to be placed on CenturyLink QC.” DOC notes that the conditions should be placed on the regulated entity, rather than on Dex. This recommendation is consistent with the current approach to directory rules; *i.e.*, the regulations govern CenturyLink and Dex Media fulfills them pursuant to its publishing contract with CenturyLink. Thus implementation of the conditions by Dex Media will not be an issue so long as the conditions are drafted broadly enough so that CenturyLink is able to continue to outsource fulfillment to Dex Media by contract.

DOC proposes two types of conditions that can be referred to as “mandatory”¹ or “prohibitory”² conditions. The Petitioners are in agreement with the prohibitory conditions, such as not marketing or obtaining certain personally identifiable information from consumers requesting printed copies of the residential white pages. These prohibitory conditions are consistent with the proposed conditions adopted in the rulemaking docket on October 16, 2014, which the Petitioners supported. *See* In the Matter of Possible Amendments to Rules Concerning White Pages Directory Publication and Distribution; Docket No. P-999/R-13-459.

Likewise, for the most part, the mandatory conditions are consistent with what Petitioners are proposing and have implemented in more than 25 states already. A minor

¹ Proposed conditions A, B, C, D, E, and F.

² Proposed conditions G, H, and I.

exception arises in the last clauses of proposed conditions D, E, and F, which would, if taken literally, require CenturyLink to duplicate the Dex Media directory websites at CenturyLink.com. This would be unnecessary and unduly burdensome.

Maintaining directory listings on the Internet is a huge job that Dex Media already undertakes. In contrast, CenturyLink no longer directly provides any form of directories and has sold that business to Dex Media. While CenturyLink has the obligation to provide directory service to its customers it has outsourced that work to Dex for over ten years. There is no need to require CenturyLink to re-enter the directory business and duplicate Dex Media's rich and user-friendly websites (www.dexknows.com and www.dexpages.com). The proposed rule leaves such minor details regarding how to implement the transition to electronic directories up the discretion of the regulated service providers.

Perhaps the subjects of DOC proposed conditions D-F are likewise best left to reasonable business discretion, consistent with the proposed rule. But if the Commission feels such mandatory conditions are needed, at the very least CenturyLink should be allowed to comply by providing a link or reference to the existing Dex Media websites. In this way, CenturyLink would be able to outsource the obligations to Dex Media consistent with longstanding practice. The DOC's conditions would be revised as follows:

D. CenturyLink QC shall make electronic white page residential directories for Minneapolis, Northwestern Suburban, Western Suburban, St. Paul, Forest Lake Area, St. Croix Valley, White Bear Lake Area, South Metro, and Southeast St. Paul Suburbs available by a link on its website.

E. CenturyLink QC shall notify affected customers in the areas covered by the Minneapolis, Northwestern Suburban, Western Suburban, St. Paul, Forest Lake

Area, St. Croix Valley, White Bear Lake Area, South Metro, and Southeast St. Paul Suburbs directories that residential white pages are not included in the business and government telephone directories for those areas, and that customers may request the residential white pages. The notice shall provide a toll free number which customers may call to request residential white pages directories, and shall direct customers to a CenturyLink QC's website where the residential white pages may be accessed.

F. CenturyLink QC shall state (or direct that its directory publisher state) on the delivery bag of the business and government telephone directory that customers can request a printed copy of the residential white pages. The message shall provide a toll free number which customers may call to request residential white pages directories, and shall direct customers to a CenturyLink QC's website where the residential white pages may be accessed.

The Petitioners contacted the DOC regarding the foregoing modifications prior to filing this Reply. The DOC authorized to Petitioners to inform the Commission that DOC does not oppose the recommended modifications.

II. The MCCA Supports the Petition.

Petitioners appreciate that MCCA agrees that the Petition is in the public interest, with three conditions or understandings. With one exception, Petitioners agree with the MCCA's requests.

First, MCCA seeks to clarify that the waiver should apply to competitive service providers in the relevant service territory and not just to CenturyLink. This was specifically stated in the Petition (Paragraph 33 A.) and is essential, since Dex Media currently provides directory distribution for all service providers in CenturyLink's territory in Minnesota. Not only does Dex Media not distinguish between CenturyLink's and competitive providers' customers, it is *unable* to do so. Dex Media does not even know which service provider serves any of the households to which it distributes directories. All households are treated the same regardless of their service provider or

even if they are “cord-cutters,”³ except for households which have made a specific request, such as to opt-in or opt-out of certain directories.

Next, MCCA states that Dex Media should be prohibited from marketing for CenturyLink to callers requesting directories. This is consistent with DOC’s condition, the proposed rule, and Dex Media’s longstanding practices. Petitioners have no issue with this condition.

Finally, MCCA seeks a requirement that Dex Media accept electronic files from competitive service providers identifying their subscribers who request printed residential white pages—in the pursuit of parity. But this proposal would result not in parity with CenturyLink, but rather in an undue advantage for MCCA members. Dex Media does not accept such electronic files from CenturyLink in Minnesota nor from any ILEC it contracts with in any state. Indeed, in all 43 states that Dex Media serves as an official ILEC directory publisher, customers contact Dex Media directly for their directory needs. The LECs are not involved and do not need to be involved. The unstated premise of MCCA’s request—that large numbers of its members’ customers will be contacting the members to request printed residential white pages—is not realistic, efficient, or consistent with Dex Media’s planned messaging to consumers based on years of successful implementation of upon request distribution in numerous states.

If sharing of electronic files were truly necessary, then MCCA would be able to point to experience under the Frontier variance, which does include the requested condition. Dex Media is the official publisher for Frontier in Minnesota, but it has not had a single request from an MCCA member to transmit electronic files of their

³ *I.e.*, the household has no Commission-regulated service provider.

customers who have requested printed residential white pages. Customers of MCCA’s members in Frontier’s service areas—just as customers of CLECs in dozens of other states—have had no difficulty calling the Dex Media toll free number or going to the Dex Media website to express their directory preferences directly to the directory provider. The current practice is efficient and it is working.

Thus, while Dex Media has offered to negotiate the issue in good faith, acceptance of electronic files should not be made mandatory because it is very unlikely there will be a need for it.⁴ And in the extremely unlikely event an MCCA member were to receive a large number of requests directly from its customers, there would need to be a dialogue between the member and Dex Media regarding timing, electronic format, protocols, transmission, security, subscriber request validation, etc. The MCCA request is not simple and is certainly not self-executing.

Finally, neither CenturyLink nor Dex Media have any duty under federal or state law to produce or distribute directories for MCCA members. LECs have duties to share listing information, and ILECs have unique duties regarding listings, but to the extent LECs have publishing and distribution duties, competitive providers are not entitled to shift their duties onto the ILEC under any applicable law.⁵ MCCA has benefitted for many years from Dex Media’s willingness to voluntarily deliver directories to all homes and businesses without regard to the service provider. But turning that voluntary practice

⁴ Less than 1% of subscribers are requesting printed residential white pages and all or nearly all of them are following the directions on the cover of the yellow pages and the delivery bag to call 1-877-2GET-DEX or going to www.dexknows.com/green.

⁵ See, e.g., 47 U.S.C. §§ 222(e), 251(b)(3), 271(c)(2)(B)(viii); 47 C.F.R. § 51.217(c)(3)(ii); Minn. Rule 7810.2900.

into a regulatory requirement on CenturyLink or Dex Media is not appropriate here. Nor is it necessary.

CONCLUSION

The variance Petition should be granted, either with no further conditions or only with the conditions proposed by the DOC, *as modified above* to allow consumers to express directory preferences on the Dex Media website. The Commission should decline to adopt MCCA's electronic files request as it has done in the rulemaking proceeding.

Respectfully submitted this 4th day of November, 2014.

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CENTURYLINK QC**

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