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February 19, 2015

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Via: E-file


Re: DOCKET NO. P-999/R-13-459: **COMMENTS OF DEX MEDIA PURSUANT TO DUAL NOTICE IN SUPPORT OF PROPOSED AMENDMENTS TO RULES CONCERNING WHITE PAGES DIRECTORY PUBLICATION AND DISTRIBUTION** ; OAH docket No. 11-2500-32109

Dear Mr. Wolf:

Dex Media East, Inc. files its **COMMENTS OF DEX MEDIA PURSUANT TO DUAL NOTICE IN SUPPORT OF PROPOSED AMENDMENTS TO RULES CONCERNING WHITE PAGES DIRECTORY PUBLICATION AND DISTRIBUTION** pursuant to the schedule established by the **DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing** *Issued: January 8, 2015.*

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	Chair
Betsy Wergin	Vice- Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

I, Gregory A. Ludvigsen, hereby certify that I have this day, on behalf of Dex Media East, Inc., served a true and correct copy of the following document to all persons on the Commission e-file list for this docket at the addresses list by e-file on the Commission's web site:

COMMENTS OF DEX MEDIA PURSUANT TO DUAL NOTICE IN SUPPORT OF PROPOSED AMENDMENTS TO RULES CONCERNING WHITE PAGES DIRECTORY PUBLICATION AND DISTRIBUTION

Docket Number DOCKET NO. P-999/R-13-459; OAH docket No. 11-2500-32109

Dated this 19th day of February, 2015



Gregory A. Ludvigsen

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
Betsy Wergin
Nancy Lange
Dan Lipschultz
John Tuma

Chair
Vice- Chair
Commissioner
Commissioner
Commissioner

In the Matter of Possible Amendments to
Rules Concerning White Pages
Directory Publication and Distribution

DOCKET NO. P-999/R-13-459

OAH Docket No. 11-2500-32109

HEARING NOT REQUESTED

**COMMENTS OF DEX MEDIA PURSUANT TO DUAL NOTICE IN
SUPPORT OF PROPOSED AMENDMENTS TO RULES CONCERNING
WHITE PAGES DIRECTORY PUBLICATION AND DISTRIBUTION**

Dex Media East, Inc. (hereinafter “Dex Media”), appreciates this opportunity to comment pursuant to the Commission’s Dual Notice¹ issued in this docket on January 8, 2015 (“Notice”). Further, Dex Media applauds the Commission for proposing and pursuing to conclusion its forward-thinking rule amendments related to the distribution of alphabetical listings of telephone subscribers’ numbers, commonly call the “white pages directories.” And, specifically, Dex Media enthusiastically supports the rule amendments in the form as attached to the Notice and published in the State Register. The amendments are essential to modernize the Commission’s rules and to take into account the massive changes in competition and technology both in telecommunications and directories since the rules that will be amended were originally adopted.

¹ “DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing Are Received; Revisor's ID Number RD4218.”

The proposed rule amendments will enable Dex Media and other publishers of official LEC directories to better tailor their distribution of residential white pages to meet consumers' needs and demand. The proposed rules acknowledge and adopt the reality that today most telephone users obtain phone numbers electronically. The new rules will allow LECs and their publishers to offer electronic directories to subscribers in lieu of printed directories. Since extensive experience has shown that roughly 99% of consumers are satisfied with electronic-only white pages, the new rules will save environmental resources and reduce inefficient and wasteful costs that were imposed under the old rules.

To protect the interests of the roughly one percent of consumers who may still prefer printed directories, the new proposed rules retain print as an option for this small and diminishing minority of subscribers. LEC subscribers will be able to easily request printed white pages upon issuance of new directories. Accordingly, the proposed amendments will be equally beneficial to consumers, industry, and the environment.

Dex Media has filed comments in this docket on December 6, 2013; July 31, 2014; and August 12, 2014 ("Prior Comments"). To avoid needless duplication, the Prior Comments are incorporated by reference. Suffice it to say, there is extensive and largely un rebutted evidence in the record supporting the proposed changes. Indeed, all the prior commenters agree that change is needed. The Commission's Statement of Need and Reasonableness, issued January 16, 2015, sets forth an excellent summary of the justifications for updating the Commission's directory rules. In light of minimal current customer usage or demand for printed white pages, the Commission's elimination of the current requirement of saturation delivery will reduce consumer frustration, cut needless

paper in waste streams, and minimize diversion of publisher resources and dollars from updating digital products.

The proposed rules are the product of careful consideration over the course of over a year, several drafts and revisions, and extensive input from the industry and other stakeholders. While no stakeholder achieved all of their goals, the text attached to the Notice strikes a reasonable balance among competing interests. Accordingly, Dex Media encourages the Commission to adopt the rules in their present proposed form, and without further changes. Such last minute changes could upset the current balance and can sometimes lead to unintended and untoward consequences. Further, because of the extensive prior proceedings, Dex Media does not believe a hearing is required, unless 25 persons file timely requests.

CONCLUSION

For the foregoing reasons and the reasons set forth in Dex Media's Prior Comments, the Commission should adopt the proposed rule amendments as set forth in the Notice, without changes and without a hearing.

Respectfully submitted this 19th day of February, 2015.

/s/ Brooks E. Harlow

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