

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

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

P-999/R-13-459

**COMMENTS OF
CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC
and
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.**

In a June 10, 2014 *Notice of Comment Period on Possible Rule Changes* (“Notice”), in this docket, the Minnesota Public Utilities Commission (“Commission”) sought comments from interested parties regarding possible amendments to the rules regarding white page directory publication and distribution. In this filing, Citizens Telecommunications Company of Minnesota, LLC and Frontier Communications of Minnesota, Inc. (collectively, “Frontier”) submit their comments.

Background

As Frontier noted in its earlier Comments in this docket, it is entirely appropriate that the Commission review and modify its rules regarding telephone directories. Today, customers have multiple options for obtaining the information that was traditionally provided only through the local exchange carrier’s printed directory. Competitive printed directories of various types are dropped at consumers’ doors; numerous websites provide residential and business listings; web search engines deliver business listings and advertisements right to the customer’s computer screen on demand. Additionally, the vast majority of wireless numbers are not published in directories.

Frontier has first-hand experience bearing on the desires and wishes of today's customers for printed telephone directories. In 2012, Frontier sought, and the Commission granted, a waiver of the rules which relieved Frontier of the blanket obligation to deliver a printed residential white page directory to every one of its customers. Frontier has taken advantage of the waiver in certain areas of its Minnesota service territory. Under the waiver, in those areas Frontier delivered printed directories to all its customers that contained a business white page directory and Yellow Pages, as well as information regarding emergency services and other informational material. Frontier also notified all its customers in those areas that a printed residential white page directory was available for the asking. The customer response to that offer was instructive: less than 1% of customers asked for a printed residential white page directory.

Discussion

Frontier's position is that the Commission's rules should focus on what information is required to be available to customers rather than prescribe the format by which that information will be provided. The means by which this "required information" is provided to the customer (via the traditional printed directory, by electronic format, or some combination of the two) should not be mandated by the rules. While the proposed rule amendments continue to distinguish between "printed" and "electronic" directories, Frontier's understanding of the proposal is that it is agnostic to whether that required information is made available in printed or electronic form, subject to a particular consumer's specific request for a printed version.

Frontier supports the Commission's proposed amendments to its rules as described in the Notice.

Dated July 31, 2014

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS COMPANY OF MINNESOTA, LLC
FRONTIER COMMUNICATIONS OF MINNESOTA, INC.

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