

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
Commissioner
Commissioner
Commissioner

Request for Comments
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 an October 11, 2013 *Request for Comments*, 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

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. Indeed, the idea of thumbing

through a big paper directory to find the phone number for a nearby pizza parlor would likely seem quaint to many of today's consumers.

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 with respect to two of its directory areas in Minnesota; the South Metro area (covering Apple Valley, Burnsville, Farmington, Lakeville, etc.) and the Lakes Area (covering Almelund, Lindstrom, Scandia-Marine, Taylors Falls, Wyoming, etc.). 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

Given the major change in consumer behavior resulting from the multitude of alternatives for obtaining information regarding telephone numbers, 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. However, it is appropriate that a traditional paper directory continue to be made available to consumers that explicitly seek that format.

Specific questions

In the *Request for Comments*, the Commission asked several specific questions. Frontier responds as follows:

1. Should the Commission establish by rule whether electronically published directories should be accessible to the public or to a limited class of persons such as customers? If so, what should the Commission require? The working draft leaves this determination to each local service provider.

The Commission's rules should only address or require the provision of this material to the carrier's local service customers. The provision of the information to other persons is beyond the Commission's area of interest. The working draft's approach is appropriate.

2. Should the Commission establish by rule the "default" format of directories (that is, the format of directories provided to customers who do not notify their local service provider of their preference)? If so, what should the Commission require? The working draft leaves the format determination to each local service provider for customers that do not specify a preferred format.

The rules should not mandate a default format for the directories. Rather, the rules should address the information that should be made available to customers. The default format by which that information is provided should not be prescribed. However, a traditional paper directory should be available to customers that request a copy. As noted, it has been Frontier's experience that, given a choice, very few customers want a traditional paper directory.

3. Should the Commission's rule distinguish between Business and Residential customers, either by requiring different default directory formats or by permitting local service providers to provide Business and Residential listings in different formats? The working draft leaves the default format determinations to each local service provider, and allows local service providers to publish some listings electronically, and others in print, if a customer does not specify a preferred format.

Again, the rules should address the information that should be made available to customers, and not prescribe the format by which that information must be provided.

Proposed rules

The Commission proposed several revised rules for comment. With respect to those specific rules, Frontier offers the following comments.

7810.0100 DEFINITIONS

Subp. 11a. Complete Directory

Creating and defining the term, "Complete Directory", is not necessary. Frontier suggests this rule be eliminated.

7810.0100 DEFINITIONS

Subp. 26a. Local Service Provider

No comments.

7810.2900 FORM AND CONTENT OF DIRECTORIES.

Subpart 1. Basic Requirements.

The rules should focus on what information is made available to customers, and not require a particular format. To that end, Frontier suggests that Subpart 1 be retitled, “**Required directory information**”, and the verbiage revised to read,

“Directory information shall be regularly compiled and shall contain:

A. each customer’s name, telephone number, and, if practical, address, except when that information is unlisted at the customer’s request;

B. information, appropriate to the area served, pertaining to emergency calls, including information for police and fire departments;

C. instructions, appropriate to the area served, concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of telephone company business offices;

Subpart 2. Printed Directories.

Consistent with a focus on the information required rather than the format of provision, Frontier suggests that this subpart be retitled “**Method of delivery**”, and the content revised to the following:

A Local Service Provider shall provide the required directory information identified in Subpart 1 to its customers. The Local Service Provider shall provide that information through either printed directories or electronic means, or some combination thereof. A Local Service Provider shall annually notify its customers of the customer’s options for obtaining the required directory information. A printed directory shall be delivered to a customer, upon the specific request of that customer. Upon commission request, a local service provider shall furnish to the commission a copy of its directory information, whether printed or electronic.

Subpart 3. Electronically Published Directories.

This subpart should be eliminated.

7810.2900 DIRECTORIES: CUSTOMER OPTION.

Subpart 1. Customer Option.

This subpart should be eliminated.

Subpart 2. When No Customer Option is Specified.

This subpart should be eliminated.

7811.0600 BASIC LOCAL SERVICE REQUIREMENTS.

Subpart 1. Required services.

This rule should be revised to read:

F. access to required directory information as identified in 7810.2900;

7812.0600 BASIC LOCAL SERVICE REQUIREMENTS.

Subpart 1. Required services.

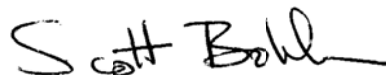
This rule should be revised to read:

F. access to required directory information as identified in 7810.2900;

Dated December 6, 2013

Respectfully submitted,

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



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Proposed Rules

7810.0100 DEFINITIONS

Subp. 26a. Local Service Provider

“Local Service Provider” or “LSP” means a telephone company or telecommunications carrier providing local service in Minnesota pursuant to a certificate of authority granted by the commission. Local service provider includes both local exchange carriers and competitive local exchange carriers.

7810.2900 FORM AND CONTENT OF DIRECTORIES.

Subpart 1. Required directory information.

Directory information shall be regularly compiled, at least annually, and shall contain:

- A. each customer’s name, telephone number, and, if practical, address, except when that information is unlisted at the customer’s request;
- B. information, appropriate to the area served, pertaining to emergency calls, including information for police and fire departments;
- C. instructions, appropriate to the area served, concerning placing local and long distance calls, calls to repair and directory assistance services, calls to local, state, and federal government offices, and the location of telephone company business offices.

Subpart 2. Method of delivery.

A Local Service Provider shall provide the required directory information identified in Subpart 1 to its customers. The Local Service Provider shall provide that information through either printed directories or electronic means, or some combination thereof. A Local Service Provider shall annually notify its customers of the customer’s options for obtaining the required directory information. A printed directory shall be delivered to a customer, upon the specific request of that customer. Upon commission request, a local service provider shall furnish to the commission a copy of its directory information, whether printed or electronic.

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