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House of Representatives

CONFERENCE REPORT ON S. 652, TELECOMMUNICATIONS ACT OF 1996

(Mr. BARTON of Texas asked and was given permission to revise and extend his remarks.)

Mr. BARTON of Texas. Mr. Speaker, I want to also express my support to the leadership on both sides of the aisle that have pushed this legislation. Special thanks to my good friend, JACK FIELDS, who is retiring at the end of this session and this is going to be his legacy. He gets triple gold stars for his work.

I want to give a special thought on the local control of the right-of-way. The gentleman from Michigan, Mr. STUPAK, and myself and Senator HUTCHISON in the Senate have worked on that. I had a phone conversation with the president of the League of Mayors this morning, the gentleman from Knoxville, TN. They are supporting the bill.

I would urge all Members who have had some concerns expressed by their mayors to be supportive. We have worked out language in the bill and in the conference report that gives cities absolute guarantees to control their right-of-way and to charge fair and reasonable nondiscriminatory pricing for the use of that right-of-way.

This is a good piece of work, it is comprehensive, it is revolutionary. As my good friend, the gentleman from Virginia [Mr. BOUCHER], said, this opens up seamless interactive communications for all Americans, and I would urge an "aye" vote on the bill.

Mr. Speaker, section 702 of the bill adds a new section 222(e) to the Communications Act which would prohibit any provider of local telephone service from charging discriminatory and/or unreasonable rates, or setting discriminatory and/or unreasonable terms or conditions, for independent directory publishers buying subscriber list information.

Subscriber list information is essential to publishing directories. Carriers that charge excessive prices or set unfair conditions on listing sales deprive consumers and advertisers of cheaper, more innovative, more helpful directory alternatives.

Under section 257 of the bill, within 15 months from the date of enactment, the FCC is to undertake rulemakings to identify and remove barriers to entry for small businesses involved with telecommunications and information services. Clearly, the requirements of section 702 with respect to subscriber list information fall within this rulemaking requirement.

As the FCC determines what constitutes a "reasonable" price for listings, it seems clear that the most significant factor in that determination should be the actual, or incremental cost of providing the listing to the independent publisher. This approach assures that providers get back what it actually costs them to deliver the listings to a publisher without being allowed to "load" the price with unrelated costs and cross-subsidies.

COMPETITIVE ISSUES RELATING TO SUBSCRIBER LISTING INFORMATION

A Brief Empirical Economic Overview

by

Christopher C. Pflaum, Ph. D.

SPECTRUM ECONOMICS, INC.

June 1996

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INTRODUCTION AND SUMMARY

Spectrum Economics was asked by the Association of Directory Publishers (ADP) to assist ADP in responding to the Commission's Notice of Proposed Rulemaking regarding implementation of the new provision of the Communications Act that requires telephone companies to provide subscriber listing information to directory publishers other than the telephone company's affiliated publisher on reasonable and nondiscriminatory terms and conditions. Dr. Christopher Pflaum, an economist with Spectrum Economics, undertook to provide that assistance on the basis of his extensive regulatory, litigation and consulting experience in the utility, telephone and directory advertising industries. Dr. Pflaum's credentials and experience are detailed in an attachment to this report.

In this report we briefly summarize, from an economist's perspective, some of the issues arising from (l) the fundamental essentiality of subscriber listing information to the production of classified telephone directories (printed and electronic); (2) the telephone companies' absolute control over access to such information; and (3) the anticompetitive consequences that occur when the telephone companies artificially restrain their competitor's access to such information. As we see it, Congress saw those anticompetitive consequences and wanted to eliminate them, prospectively, through the enactment of Section 222(e) of the Communications Act.

Telephone Company Listing Information Is An Essential Facility

Only local telephone companies (called Local Exchange Carriers or LECs) can acquire (and have an inescapable need to maintain) a timely and accurate database of the names, addresses, and telephone numbers of every household and business that subscribes to telephone service (DLI). Since commercial telephone service began, telephone companies have provided without separate charge a listing in the telephone company's printed alphabetical (white pages) and dialup (directory assistance) directories. Business telephone subscribers, who have historically paid a higher rate for telephone service, have also received one free listing in the telephone company's "official" classified (yellow pages) business directory.

In order to establish service, bill for service, provide the "free" white pages listing, and -- in the case of businesses -- provide the "free" yellow pages classified listing, telephone company business office personnel collect and maintain the name, address, telephone number, and business classification, for each subscriber. The telephone companies' collection of names, addresses and telephone numbers is necessary to provide telephone service.

Telephone companies historically have published their own telephone directories. To do this, they routinely furnished their directory operations with the necessary subscriber listing information. The directory operations would then sell display and in-column advertising to the businesses listed in the directory and to "national" advertisers (e.g., national chains of rental car companies, nationwide franchisors, etc.).

Telephone Companies Have "Leveraged" Control Over DLI To Monopolize Directory Publishing

The sale of yellow pages directory advertising is and has long been an enormously profitable business for telephone companies. Investment returns in excess of 100% and profit margins on sales of over 50% are common for utility publishers. These returns far exceed those typical of competitive businesses and are indicative of a monopoly market.

Prior to the divestiture of local telephone operations by AT&T in 1984, there were numerous small enterprises that published telephone directories. AT&T and most other telephone companies apparently did not see those small publishers as significant competitive threats and generally allowed them to copy listings from telephone company directories or provided updated listings at minimal "license" fees. The telephone companies also asserted copyright interest in the listings.

After the AT&T divestiture, telephone companies focused new attention on the directory business. The divested RBOCs and their traditional vendors (such as Reuben H. Donnelley, Leland Mast, and L.M. Berry) began producing competitive directories outside their traditional service areas in competition with local telephone utilities. This competition resulted in both price and usage pressure on the incumbent monopolies as new entrants offered advertising at significantly lower rates and made enhancements to their directories which made them more useful to consumers.

The telephone companies responded to actual and potential competitive entry into their directory monopolies by raising artificial barriers to such entry. One of the most common barriers was to make subscriber listing information more expensive and more difficult to use than it had formerly been. Some telephone companies refused absolutely to provide subscriber listing information to competitors, while others accomplished substantially the same result by imposing prices and terms and conditions that made the data unacceptably costly and difficult to obtain and use in a competitively meaningful way.

Such restrictions on the availability of subscriber listing information were often accompanied by other anticompetitive acts by telephone utilities. For example:

- targeted price cuts for directory advertising
- threats of copyright litigation against small publishers who couldn't afford higher DLI rates
- disparagement of competitive directories as "inaccurate" because the independent publisher lacked access to timely listing information.

A common predatory strategy combined these elements. The first step was to increase the price of listings to make them unaffordable to competitors. This caused the competitor to switch from using an up-to-date database to the less expensive option of copying the utility's listings from the current utility directory (called the book-on-the-street). Utility sales representatives would then disparage the competitive directory as containing inaccurate listing information.

As electronic directory services started to become feasible (initially through such technologies as audiotext and, more recently, through on-line computer and video services) some telephone companies sought to prevent entry into those segments of the market by refusing to provide subscriber listings at any price or on any terms for use in electronic directories. This problem was especially acute in the case of former Bell System companies that wanted to deter competitive entry into electronic directory services until they could escape the "information services" provisions of the AT&T divestiture decree (sometimes called the MFJ).

Antitrust suits were brought by publishers complaining of these tactics. I served as a consultant, or testifying expert in several such matters, including: Great Western Directories v. Southwestern Bell Telephone; Metropolitan Directories v. Southwestern Bell, Inc.; Great Western Directories v. GTE; and Telecom*USA, Inc. v. U S WEST, Inc. Some of these suits resulted in improved competitive conditions but such litigation is inherently costly and time-consuming. Furthermore, in my opinion, the results of litigation have resulted in less than efficient outcomes.

Competition In Directory Publishing

Is Economically Desirable

Economic theory generally embraces competition on the grounds that under most circumstances in most industries, it produces a better combination of output, price and quality for consumers than any other market structure. Given the right basic conditions, competition in the yellow pages classified telephone directory business should provide lower prices and greater choices for advertisers, and more and better quality telephone directory information for directory users (i.e., the general public).

In my experience in directory publishing, the advent of competition has caused utility publishers to improve their products. Prior to more widespread competition in the industry following the AT&T divestiture, most utility directory publishers produced books that incorporated minimal features and were shoddily constructed. Innovations such as larger type, color and white knock-out advertisements, zip codes in white pages address listings, area maps, community interest sections and talking yellow pages were all first introduced by competitive publishers.

Competition has also restrained the pricing of many utility directory publishers. For example, a study by Spectrum Economics of advertising pricing by a utility publisher showed that the inflation-adjusted price of advertising fell in competitive markets but increased substantially in monopoly markets. We have also noticed that in one case where a utility has been successful in suppressing competition by restricting access to DLI, it subsequently aggressively raised prices and reduced the quality of the directories it publishes in its less competitive markets.

Regulation of DLI Pricing And Terms Is Necessary To Ensure The Benefits of Competition

In the real world, markets are rarely perfect and frequently they are not even workably competitive. Firms acquire market power and may use that power to illegitimate ends. Antitrust action is one response by society to this abuse. Where market power is acquired as the result of government action, the abuse of that power is proscribed and controlled through regulation.

Regulation is an imperfect substitute for true competition, even if that competition is imperfect. However, the transition from a ubiquitous monopoly to workable competition does not occur overnight. Government intervention may be needed to create or protect the conditions necessary for competition to develop and survive.

In the current transition of telecommunications, FCC regulation is a good example of such intervention. In order for competition in the telephone directory business to develop and endure, there is a need for the government to establish the ground rules for directory publishers' access to subscriber listing information and to make sure that telephone utilities follow those rules in good faith. There is simply no possibility that a competitive market in DLI will evolve in the foreseeable future and there is no substitute for these data. DLI is a quintessential "essential facility" and allowing telephone utilities to have unfettered control of it will allow them to secure unfair competitive advantage in numerous media markets including both print and electronic directory advertising, direct mail advertising, and emerging media which depend on telephonic access to consumers.

The legal provision at issue in this rulemaking -- Section 222(e) of the Communications Act -- seems designed to produce a set of conditions conducive to enhanced consumer welfare through competition. It would do so by removing a formidable barrier to such competition: unreasonable restrictions on access to telephone subscriber listing information. However, the experience of several years of antitrust litigation between independent directory publishers and telephone companies teaches that a general requirement that listings be available on reasonable and nondiscriminatory terms is a necessary but not a sufficient condition to ensure that such access is widely available in practice.

FCC Rules Regarding Terms And Prices For Publisher Access To DLI Are Necessary

FCC rules are needed to make clear what is reasonable and nondiscriminatory. Such rules ought both to prohibit expressly the abuses already known and litigated over and to prevent new forms of the old problems from emerging. Thus, at a minimum, the FCC should establish rules that:

- require telephone companies to make subscriber listing information available to publishers of directories, in both print and electronic form.

- prescribe incremental cost (or some reasonable surrogate for incremental cost) plus a reasonable return as the basis for pricing access to subscriber listing information, and

- require that listings be made available on terms and conditions that do not inhibit or restrain competitive entry into the telephone directory business.

The starting point, of course, is recognizing that timely access to accurate and up-to-date telephone subscriber listing data is essential to directory publishers and that the telephone companies are the only source. FCC rules expressly requiring that listings be made available and an efficient Commission mechanism to resolve disputes about availability would be a reasonable and pro-competitive regulatory measure.

In the past, telephone companies have imposed a dizzying array of conditions on access to listings. These restrictions were apparently designed to diminish the ability of competing directory publishers to produce and distribute directories in effective competition with the telephone companies. FCC rules should expressly prohibit any condition or limitation that is not necessary to protect reasonable customer privacy interests (such as unlisted and unpublished service listings) and should require that the telephone companies make available data at no higher a level of aggregation than the exchange (NXX), in standard commercial formats (DBase, ASCII, etc.) and media (paper, 9 track ASCII or EBCDIC, etc.).

It would be anticompetitive to require small local or regional competitors to be required to take the same universe of data as that provided to the affiliated publisher or to take data in a difficult to use format which requires extensive and difficult data processing. Rather, within the capabilities of the telephone companies' systems (including economically reasonable upgrades thereof), independent publishers should be able to choose components from a menu of alternatives with respect to geographic coverage, method of delivery, and class of service (residential or business).

From an economic perspective, I want to focus particularly on the question of prices for listings. Subscriber listings present issues familiar to students of public utility pricing. Virtually all of the costs associated with the acquisition, compilation, and maintenance of listings are costs that would have to be incurred whether or not the telephone company provides them to unaffiliated publishers and whether or not the telephone company itself produced directories; they are integral to maintaining the infrastructure of the telephone company. Furthermore, revenues from providing these data to directory publishers are inconsequential relative to the revenues from core activities.

Given these circumstances, there are two considerations in pricing these data:

- The direct costs associated with extracting them from the computer, putting them on a tape or disk or printout and delivering them to the publisher which must be fully recovered from the buyers of these data.

- A policy decision regarding what, if any, portion of the common costs of maintaining the database should be recovered in the price charged to independent directory publishers and other purchasers of these data.

The direct costs associated with providing listings can easily be calculated from telephone company cost records and employee timesheets. For example, BellSouth developed such information in 1993 to develop a rate for providing listings to independent directory publishers. BellSouth's cost study, a copy of pertinent of pages of which is attached to this report, indicated that the direct cost of providing listings to independent directory publishers was $0.003 to $0.004 per listing. That cost comprised labor costs for computer program development and maintenance, computer (CPU) time to produce an extract of listings from the database, and material packaging, and shipping of the magnetic tape containing the listings. Since all of the former Bell Companies use essentially the same customer information system, this cost is a reasonable estimate for all of them. It is also reasonable to assume that this cost is at least roughly representative of the costs that would be incurred by non-Bell telephone companies.

In its March 1993 decision in Docket No. 921317-TL, the Florida Commission accepted these costs and decided to allow BellSouth to charge independent directory publishers $0.04 per listing for access to subscriber listings.[1] That price, still very low compared to the price currently charged by most telephone companies for comparable data, is still ten time the cost of providing the listings, according to BellSouth's own data.[2]

There are two fundamental policy questions inherent in the Commission's decision on this matter:

- Are telephone utilities to be allowed to leverage their market power in wireline and mobile telephone service into adjacent markets?

- Does the Commission wish to hasten the transition of the markets to a fully competitive status by using regulatory powers to reduce barriers to entry?

[1] Telephone companies routinely charge rates between 75 cents and a dollar in addition to costly administrative and other fees. Based on my experience and knowledge of the directory industry, those prices are far in excess of costs and are little more then thinly disguised attempts to harm competitors by increasing their costs of doing business.

[2] Southwestern Bell has also admitted that the incremental cost to provide listings information to directory publishers is less than one cent. More recently, in a March 1995 study, the Canadian Radio-Television and Telecommunications Commission (CRTC) established a price of 6 cents -- 5 cents in U.S. dollars -- for provision of listings by Bell Canada. That price included a reasonable profit.

The first question is most fundamental. If for any reason the Commission allows the local telephone companies to charge more than a modest premium over cost for access to DLI, it has implicitly endorsed leveraging of the franchise into adjacent markets. Attempts to support local service subsidies by taxing independent publishers through DLI pricing may or may not be good public policy but it unquestionably countenances monopolization of what is not a public utility function.

Regarding this question, it is my opinion that the Commission's general goal should be to promote economic efficiency and consumer welfare by requiring that subscriber listings be priced at a level that approximates the telephone companies' incremental cost. It is not economically efficient to restrict competition in this industry based upon either theory or past experience. Therefore, at a minimum, the increment over cost in providing DLI should be small.

Regarding the second consideration, I believe that the Commission should carefully consider the laudatory effects of competition in the development of print telephone books. Telephone directories today are a uniformly better product than they were fifteen years ago when publication was monopolized by telephone utilities. Today, independent publishers are on the cutting edge of bringing directories into the electronic age as they were in bringing the paper product into a new era.

The lower the barriers to securing the data necessary to develop new products, the greater will be the number of entrepreneurs attracted to the markets and the more new products that will be delivered. This is an incontrovertible economic fact. The pricing of subscriber list information on an incremental cost basis will encourage both expansion of existing firms and entry by new ones (especially in view of the current monopoly-based prices).[3]

I look forward to the opportunity to review and respond to the other parties' comments in this proceeding.

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[3] There is remarkably widespread acceptance of the notion that subscriber listing information ought to be priced at the incremental cost of providing it: For example, the Economic and Monetary Affairs Committee of the European Parliament in an April 1996 report declared that "new operators and entrants into the directories market should be given access to the names, addresses and telephone numbers of all telephone customers at marginal cost." The Report further states that "[e]xisting operators should not be able to abuse their dominant position by charging unreasonable prices." That same view was expressed by two conferees to the 1996 Telecommunications Act who stated that the key component to the pricing of subscriber list information was to be incremental cost as it would most benefit the public and prevent telephone companies from otherwise "load[ing] the price."

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FLORIDA PUBLIC SERVICE COMMISSION

Fletcher Building
101 East Gaines Street
Tallahassee, Florida 32399-0850

#28

MEMORANDUM

March 4, 1993

TO : DIRECTOR, DIVISION OF RECORDS AND REPORTING

FROM : DIVISION OF COMMUNICATIONS [CHASE]
DIVISION OF LEGAL SERVICES [KURLIN]

RE : DOCKET NO. 921317-TL - REQUEST FOR APPROVAL OF PROPOSED TARIFF TO ADD DIRECTORY ASSISTANCE DATABASE SERVICE (DADS) AND DIRECTORY PUBLISHERS DATABASE SERVICE (DPDS) BY BELLSOUTH CORPORATION d/b/a SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY (T-92-627 filed OCTOBER 30, 1992)

AGENDA: MARCH 16, 1993 - CONTROVERSIAL - PARTIES MAY PARTICIPATE

CRITICAL DATES: 60-DAY STATUTORY PERIOD EXPIRED DECEMBER 29, 1992
COMPANY REQUESTED EFFECTIVE DATE MARCH 17, 1993

SPECIAL INSTRUCTIONS: I:\PSC\CMU\WP\921317.RCM

DISCUSSION OF ISSUES

ISSUE 1: Should BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's proposed tariff filing to add Directory Assistance Database Service (DADS) and Directory Publishers Database Service (DPDS) be approved?

RECOMMENDATION: Yes. BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's proposed tariff filing to add Directory Assistance Database service (DADS) and Directory Publishers Database Service (DPDS) should be approved. The effective date should be March 17, 1993.

STAFF ANALYSIS: On October 30, 1992, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company (Southern Bell) proposed revisions to its General Services Tariff to introduce two new service offerings: Directory Assistance Database Service (DADS) and Directory Publishers Database Service (DPDS). The services are described as follows:

Cost Information

An incremental cost methodology was used to develop costs for DADS and DPDS. Attachment A is the Work papers used to arrive at the costs for DADS and DPDS. The cost for the services results directly from providing additional units of service. Traditionally, prices for discretionary services should be set at a level which at least covers the direct cost incurred. Staff believes that an incremental cost methodology provides the proper test for pricing decisions. The costs for DADS and DPDS are summarized on Table 1-C.

TABLE 1-C

DIRECTORY ASSISTANCE DATABASE SERVICE (DADS) AND DIRECTORY PUBLISHERS DATABASE SERVICE (DPDS) COSTS		
	Proposed Rates	Cost
DADS Service		
Base File Cost Per Listing	$ 0.04	$ 0.001
File Updates Cost per CO per Month	$13.59	$11.81
DPDS Service		
Central Office Extract Cost per Listing	$ 0.04	$ 0.003
Business Activity Report Cost Per Listing	$ 0.006	$ 0.004

The cost of providing DADS and DPDS includes the labor cost for the computer program development and maintenance; Central Processing Unit (CPU) hours required for each extract; and material, packaging and shipping expense for the magnetic tapes. Incremental costs associated with the Directory Assistance Access Service demand that is cross elastic with DADS includes operator labor and investment associated with operator positions.

The estimated programmer analyst's hours for program development was divided by the number of requests over the initial three years to develop the average hours per file extract. Similarly, the annual maintenance hours were divided by the average annual requests. The respective software development and maintenance costs were produced by multiplying these results by the appropriate directly assigned labor cost. The CPU hours required for the extracts were multiplied by the CPU cost per hour to develop the data processing costs.

Material cost for the magnetic tapes and the paper output, along with delivery, were added to the software development and maintenance and data processing costs. This result was divided by the average number of listings that will be billed each month to produce the cost per listing for each service.

For the Weekly Business Reports, the CPU hours were negligible. Additional administrative costs include the provision of the Daily Updates. The costs associated with providing the Daily Updates are auditing costs, program maintenance, data processing, tape packaging and delivery and gross receipts tax. Staff has reviewed Southern Bell's cost study and we believe it appears reasonable.

Demand and Revenue Information

Table 1-D

DADS USE FEE DEMAND			
	Year 1	Year 2	Year 3
Interstate DA Usage	34,500,029	36,915,031	39,499,083
Intrastate DA Usage	19,617,327	20,990,540	22,459,878
Total Demand	54,117,356	57,905,571	61,958,961

Table 1-D and Table 1-E summarizes the three year (first 36 months period) projected demand for DADS. Southern Bell projects demand for DADS during Year 1 (first 12 months period) to be one customer displacing 54,117,356 interstate and intrastate DA access calls. Since, local DA (i.e., 411 and 555-1212) is reserved for the local exchange company, there is zero DADS contribution from these DA services; and therefore no cross elastic effect. The gross revenue for Year 1 is projected to be $8,311,327. The projected net contribution for the same period, including expenses. cost savings and cross elastic impacts is $3,920,191.

Southern Bell

Marshall M. Criser III
Operations Manager
Regulatory Relations

Suite 400
150 South Monroe Street
Tallahassee, Florida 32301-15561
904 222-1201
FAX 904 222-8640

8 February 1993

Mr. Walter D'Haeseleer
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0866

Re: DADS and DPDS Data Request

Dear Mr. D'Haeseleer:

Attached is Southern Bell's response to the above noted request.

If I can be of any further assistance, please advise.

Yours very truly,

George L. Hogue

for Operations Manager - Regulatory Relations

Attachment

COST STUDY
DIRECTORY ASSISTANCE DATABASE SERVICE
DIRECTORY PUBLISHERS DATABASE SERVICE

1. Introduction and Overview

This cost study is performed to identify the incremental cost of Directory Assistance Database Service (DADS) and Directory Publishers Database Service (DPDS).

DADS provides a base file of directory listings and a daily update file of directory listing changes. These files are provided by Central Offices (by central office prefix, i.e., NNX) via magnetic media. This data is intended for customers providing alternate directory assistance service.

DPDS provides an extract of directory listings by requested Central Offices (by central office prefix, i.e., NXX). It also provides optional weekly reports of Central Office Business Activity.

The cost of both services includes, where appropriate, the labor cost for system development and maintenance, computer processing cost to produce the listing data, and material/packaging/delivery cost for the magnetic and paper media.

3. Description of Procedures

The estimated programmer analyst's hours for program development was divided by the number of requests over the initial three years to develop the average hours per file/extract. Similarly, the annual maintenance hours were divided by the average annual requests. The respective software costs were produced by multiplying these results by the appropriate directly assigned labor cost.

The Computer Processing Unit (CPU) hours required for the extracts were multiplied by the CPU cost per hour to develop the data processing costs.

Material cost for the magnetic tapes and the paper output, along with delivery, were added to the software and data processing costs. This result was divided by the average listings that will be billed each month to produce the cost per listing for each service.

For the Weekly Business Reports, the CPU hours were negligible.

DIRECTORY ASSISTANCE DATABASE SERVICE (DADS)
DIRECTORY PUBLISHERS DATABASE SERVICE (DPDS)
1993 INCREMENTAL UNIT COST

STATE: FLORIDA
DATE: 04 JAN 1993
SUMMARY

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DADS
BASE FILE

COST PER LISTING	$0.001

FILE UPDATES

COST PER CO FILE PER MONTH	$11.81

DPDS

CENTRAL OFFICE EXTRACT	
COST PER LISTING	$0.003
BUSINESS ACTIVITY REPORT	
COST PER LISTING	$0.004

DIRECTORY PUBLISHERS DATABASE SERVICE (DPDS)
1993 INCREMENTAL UNIT COST

STATE: FLORIDA
DATE: 15 OCT 1992
WORKPAPER 3

LINE	DESCRIPTION	SOURCE	AMOUNT
	CENTRAL OFFICE EXTRACT		
1	PROGRAM DEVELOPMENT, HOURS PER CO EXTRACT		0.51
2	DIRECTLY ASSIGNED LABOR COST PER HOUR		$44.35
3	PROGRAM DEVELOPMENT COST PER CO EXTRACT	LN1xLN2	$22.62
4	PROGRAM MAINTENANCE, HOURS PER CO EXTRACT		
5	DIRECTLY ASSIGNED LABOR COST PER HOUR		0.75
6	PROGRAM MAINTENANCE COST PER CO EXTRACT	LN4xLN5	$44.35
			$33.26
7	DATA PROCESSING COST PER CO EXTRACT		$17.25
8	MAG TAPE, PACKAGING AND DELIVERY COST PER CO EXTRACT		$39.00
9	GROSS RECEIPTS (GRT) TAX		1.0138
10	TOTAL COST PER CO EXTRACT	(LN3+LN6+LN7+LN8)LN9	$113.68
11	AVERAGE LISTING PER CO EXTRACT		35,900
12	TOTAL COST PER LISTING	LN10/LN11	$0.003
	CENTRAL OFFICE BUSINESS ACTIVITY REPORT		
13	ADMINISTRATION, PACKAGING AND DELIVERY COST ASSOCIATED WITH LISTING PRINTOUT PER CO BUSINESS ACTIVITY REPORT		$129.39
14	TOTAL COST PER CO BUSINESS ACTIVITY REPORT	LN13xLN9	$131.18
15	AVERAGE LISTINGS PER CO EXTRACT		35,900
16	TOTAL COST PER CO LISTING	LN14/LN15	$0.004