

- 1 1. BellSouth should not be required to offer a listing service
- 2 consisting solely of new connections of residential and business
- 3 subscribers.
- 4 2. BellSouth's newly effective update service appropriately serves
- 5 the needs of the Company's DPDS customers.
- 6 3. Restrictions currently included in BellSouth's DPDS tariff should
- 7 be retained.
- 8 4. BellSouth does not believe any tariff changes are required.

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10 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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12 A. Yes.

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1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF M. LYNN JUNEAU
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 931138-TL
5 November 25, 1996

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8 Q. PLEASE STATE YOUR NAME, EMPLOYER, POSITION AND
9 BUSINESS ADDRESS.

10
11 A. My name is M. Lynn Juneau. I am employed by BellSouth
12 Telecommunications, Inc. (hereinafter referred to as "BellSouth" or "the
13 Company"). My present position is Manager-Pricing in the
14 Interconnection Services Department. My business address is 3535
15 Colonnade Parkway, Birmingham, Alabama 35243.

16
17 Q. ARE YOU THE SAME M. LYNN JUNEAU WHO FILED DIRECT
18 TESTIMONY ON BEHALF OF BELLSOUTH ON OCTOBER 22, 1996?

19
20 A. Yes.

21
22 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?
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1 A. My testimony rebuts the direct testimony filed in this case by Gerry
2 Screven of Direct Media Corporation, on behalf of the Florida
3 Independent Directory Publishers.

4

5 Q. WHY IS YOUR REBUTTAL NECESSARY?

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7 A. My rebuttal testimony is necessary to respond to certain statements
8 made in Mr. Screven's testimony and ensure that the Florida Public
9 Service Commission ("Commission") clearly understands that
10 BellSouth's Directory Publishers Database Service (DPDS) tariff
11 effectively provides the data necessary for the independent directory
12 publishers to publish their directories. Additionally, the refresh option in
13 the DPDS tariff provides the publishers an economical means of
14 obtaining updated directory listings.

15

16 Q. ON PAGE 6, LINES 8 THROUGH 16, MR. SCREVEN'S TESTIMONY
17 STATES THAT BELL SOUTH'S AFFILIATE RECEIVES NEW LISTING
18 INFORMATION THAT IS NOT MADE AVAILABLE TO INDEPENDENT
19 PUBLISHERS. IS THIS TRUE?

20

21 A. No. BellSouth's affiliate publisher, BellSouth Advertising and
22 Publishing Company (BAPCO), receives a daily transmittal of all
23 service order activity occurring in BellSouth's nine state serving area.
24 Information about new listings is imbedded in the data transmitted, but
25 a report of new listings is not provided.

1

2 Q. PAGE 3, LINE 21 OF MR. SCREVEN'S TESTIMONY STATES THAT
3 BAPCO IS PROVIDED LISTING INFORMATION MUCH MORE
4 FREQUENTLY THAN IT IS PROVIDED TO INDEPENDENT
5 PUBLISHERS. WHY DOESN'T BELLSOUTH PROVIDE LISTING
6 INFORMATION TO THE INDEPENDENT PUBLISHERS WITH THE
7 SAME FREQUENCY IT PROVIDES INFORMATION TO BAPCO?

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9 A. BellSouth does not currently offer service to the independent publishers
10 with the same frequency as is provided to BAPCO because the
11 independent publishers have conveyed they will not purchase it.
12 BellSouth provided feasibility studies to the publishers for furnishing
13 daily listing information and has estimated costs and prices associated
14 with providing service this way.

15

16 As stated in my direct testimony, the terms and conditions of the DPDS
17 tariff now in effect in Florida are a result of agreements made pursuant
18 to regional negotiations with the Company's DPDS customers —
19 negotiations which included active involvement by Mr. Screven and
20 other independent directory publishers doing business in Florida. The
21 service we provide meets the needs of our customers.

22

23 Q. PAGE 4, LINES 15 THROUGH 19 OF MR. SCREVEN'S TESTIMONY
24 CONTAINS A LIST OF ITEMS HE WANTS THE COMMISSION TO

25

1 REQUIRE BELLSOUTH TO PROVIDE VIA DPDS. WOULD YOU
2 COMMENT ON THESE ITEMS?

3

4 A. Yes.

5

6 Q. ITEM 1 READS AS FOLLOWS:

7 "1) ALLOW DIRECTORY PUBLISHERS TO PROVIDE
8 DIRECTORIES IN PRINTED OR ELECTRONIC FORMAT;"
9 SHOULD BELLSOUTH BE REQUIRED TO ALLOW THESE USES VIA
10 DPDS?

11

12 A. The provision of directories in printed or electronic format is already
13 available under DPDS. BellSouth believes producing directories on
14 CD ROM to be electronic format. Mr. Screven's testimony implies that
15 placing directory information on the Internet is the same thing. We
16 strongly disagree.

17

18 Q. WHAT IS THE DIFFERENCE IN A DIRECTORY SERVICE AND A
19 DIRECTORY ASSISTANCE TYPE SERVICE?

20

21 A. Directory service providers publish and deliver directories. When
22 independent publishers provide consumers a CD ROM directory, they
23 are providing consumers all the listing information for the jurisdiction
24 covered by that directory. The CD ROM directory is delivered to the

25

1 user in its entirety. No "look up" of specific listing information is
 2 provided. No on-line service is provided.

3
 4 Directory assistance type service providers deliver information about
 5 specific listings. When a consumer requests (may be either voice or
 6 data) the listing for John Doe on Monroe Street, for example, the
 7 directory assistance provider performs a "look up" to locate and deliver
 8 that specific listing on line. Placement of listing information on the
 9 Internet for provision of specific listing information constitutes provision
 10 of a directory assistance type service, which is not allowed under
 11 DPDS. Companies interested in using listing information to provide
 12 directory assistance can do so by subscribing to BellSouth's Directory
 13 Assistance Database Service (DADS) service, which is tariffed and in
 14 effect in Florida.

15
 16 Q. BEGINNING ON PAGE 5, LINE 14, MR. SCREVEN'S TESTIMONY
 17 STATES, "BELLSOUTH HAS LISTINGS ON THE INTERNET, WE
 18 WANT TO DO THE SAME." CAN INDEPENDENT PUBLISHERS
 19 PLACE LISTING INFORMATION ON THE INTERNET FOR
 20 RETRIEVAL BY CONSUMERS?

21
 22 A. Yes, this use is allowed under the company's DADS tariff in effect in
 23 Florida. ~~BAPCO uses listing information provided under the DADS~~
 24 ~~provided under the DADS tariff to trial a business~~
 25 ~~tariff to provide its directory assistance-type, Internet service. BAPCO~~
~~directory assistance-type Internet service.~~
~~subscribes to DADS service and pays DADS rates.~~

*DADS IS
For Internet*

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2 Q. ITEM 2 ON MR. SCREVEN'S LIST READS AS FOLLOWS:

3 "2) PROVIDE INFORMATION ON RESIDENTIAL NEW
4 CONNECTS;"

5 SHOULD BELL SOUTH BE REQUIRED TO PROVIDE A LIST OF
6 RESIDENTIAL NEW CONNECTS?

7

8 A. No. BellSouth should not be required to provide a list consisting solely
9 of residential new connects because:

10 1) Lists consisting solely of new connects are not required to
11 publish directories, and

12 2) BellSouth should not be required to develop and offer
13 services which the publishers will not buy in sufficient
14 quantity.

15

16 Q. ITEM 3 ON MR. SCREVEN'S LIST READS:

17 "3) PROVIDE AN UPDATED SERVICE IN A REASONABLE
18 FORMAT, UNBUNDLED AND AT REASONABLE,
19 NONDISCRIMINATORY RATES."

20 IS BELL SOUTH DOING THIS TODAY?

21

22 A. Yes. The refresh update service BellSouth provides in its DPDS tariff is
23 what the regional consortium of directory publishers, with whom the
24 Company negotiated service, terms and conditions, said they wanted
25 and are willing to purchase. The Company has explored many

1 alternatives that our DPDS customers have inquired about and has
2 proposed development of those alternatives. The service developed
3 directly addresses customers' wants and needs.

4

5 Q. ON PAGE 9, LINES 3 THROUGH 19 OF HIS TESTIMONY, MR.
6 SCREVEN INDICATES THAT CUSTOMER ADDRESS INFORMATION
7 ASSOCIATED WITH UNPUBLISHED NUMBERS SHOULD BE
8 PROVIDED WITH THE WEEKLY BUSINESS ACTIVITY REPORT
9 (WBAR). IS THIS APPROPRIATE?

10

11 A. No. Providing this information via DPDS is not appropriate because it
12 would compromise the service BellSouth provides to customers in
13 Florida who pay monthly rates to have their listing information omitted
14 from directories.

15

16 Q. ARE THERE ANY OTHER COMMENTS YOU WISH TO MAKE
17 REGARDING MR. SCREVEN'S TESTIMONY?

18

19 A. Yes. On page 11, lines 4 through 7, Mr. Screven recommends that the
20 billing address for newly connected residential customers be provided
21 with an update service. It is unclear why the directory publishers need
22 a residential customer's billing address, if different from the customer's
23 residence. We do not feel it is appropriate that this information be
24 provided with DPDS service because it is not needed to publish or

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1 deliver directories. Additionally, residential customer billing information
2 is proprietary.

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4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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6 A. Yes.

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1 Q (By Mr. Carver) Mr. Juneau, could you
2 summarize your testimony, please?

3 A Yes. There are four issues in this
4 proceeding that I address in my testimony. The first
5 issue regards requiring BellSouth to offer a listing
6 service consisting solely of new connections of
7 residential and business subscribers. BellSouth
8 should not be required to offer such a listing service
9 because lists consisting solely of new connects are
10 not required to publish directories and there is no
11 demand from publishers for this service. In regional
12 negotiations with the directory publishers, BellSouth
13 has offered similar services and no one has expressed
14 willingness to buy these services at the price
15 required to cover our cost. Outside of the testimony
16 filed in this proceeding we're not aware of any other
17 demand.

18 The second issue regards the appropriateness
19 of BellSouth's newly effective update service. This
20 update service is appropriate. The monthly refresh
21 option was implemented based on negotiations with
22 Independent Publishers. In fact, the regional
23 negotiations -- in the regional negotiations three
24 options were offered and the publishers chose this
25 option.

1 The third issue regards restrictions on the
2 types of directories that can be published under the
3 directory publishers database service tariff. The
4 tariff allows for the publication of directories in
5 printed or CD ROM format and specifies that the
6 directories must be organized in alphabetical and/or
7 numerical sequence. This restriction was placed in
8 the tariff to allow DPDS information to be used for
9 directory publishing service but to prohibit this same
10 information from being used to provide directory
11 assistance service which is a separate line of
12 business covered in another tariff. Additionally, the
13 tariff specifies that DPDS data may not be used to
14 publish or distribute in any form lists of new or
15 changed telephone subscribers. The DPDS tariff is
16 designed to be used to publish telephone directories.
17 A list of new or changed telephone subscribers is not
18 consistent with this purpose.

19 The fourth issue regards the effective date
20 of tariffs filed pursuant to the Commission's order in
21 this case. BellSouth does not believe any tariff
22 changes are required.

23 BellSouth has worked with the directory
24 publishers to develop a DPDS service that meets the
25 publishers needs at a fair price. The terms and

1 conditions of the DPDS tariff now effective in Florida
2 are a result of agreements reached in regional
3 negotiations which included active involvement by the
4 members of the Florida Independent Directory
5 Publishers participating in this proceeding. Further
6 modification to BellSouth's tariff is neither
7 necessary nor appropriate.

8 Q Does this conclude your summary?

9 A Yes, it does.

10 MR. CARVER: The witness is available for
11 cross examine.

12 CHAIRMAN JOHNSON: Thank you. Mr. Horton.

13 MR. HORTON: Yes, ma'am. I have some
14 questions, but before I start I was going to see if
15 the Staff would offer their exhibit.

16 MR. PELLEGRINI: Chairman Johnson, Staff
17 would offer Exhibit MLJ-1-3 requesting identification.

18 COMMISSIONER KIESLING: Could I make an
19 inquiry? Are those still over there?

20 WITNESS JUNEAU: No, Commissioner. I have
21 no --

22 COMMISSIONER KIESLING: Okay. Mr. Screven,
23 could you return them?

24 Thank you.

25 CHAIRMAN JOHNSON: Could we get a short

1 title for MLJ-3? That's the one you'd like to have
2 identified, is it not?

3 MR. PELLEGRINI: Yes. BellSouth's Response
4 to Staff's First, Second and Third Sets of
5 Interrogatories.

6 CHAIRMAN JOHNSON: Hold up. You said that
7 you wanted to identify MLJ-3.

8 MR. PELLEGRINI: MLJ-1, 2 and 3.

9 CHAIRMAN JOHNSON: Oh, okay. I thought you
10 said 3.

11 MR. PELLEGRINI: MLJ-1 is BellSouth's
12 response to Staff's Interrogatories 1, 2 and 3.

13 MLJ-2 is BellSouth's Response to Staff's
14 First Request for Production of Documents.

15 MLJ-3 is the DADS and DPDS tariffs.

16 CHAIRMAN JOHNSON: Now, are you asking that
17 we identify these as a composite exhibit?

18 MR. PELLEGRINI: I think they should be
19 identified separately.

20 CHAIRMAN JOHNSON: Okay. Starting, then,
21 with MLJ-1, the short title for that one?

22 MR. PELLEGRINI: "BellSouth's Response to
23 Staff's Interrogatories 1, 2 and 3."

24 CHAIRMAN JOHNSON: It will be identified as
25 -- marked as Exhibit 4. And the next one? Short

1 title for MLJ-2.

2 MR. PELLEGRINI: "BellSouth's Response to
3 Staff First POD."

4 CHAIRMAN JOHNSON: It will be marked as
5 Exhibit 5. And the third?

6 MR. PELLEGRINI: DADS and DPDS tariffs.

7 CHAIRMAN JOHNSON: It will be marked as
8 Exhibit 6. Thank you.

9 (Exhibits 4, 5 and 6 marked for
10 identification.)

11 CHAIRMAN JOHNSON: Mr. Horton.

12 MR. HORTON: Yes, thank you.

13 CROSS EXAMINATION

14 BY MR. HORTON:

15 Q Good morning, Mr. Juneau. I'm Doc Horton on
16 behalf of the Directory Publishers.

17 A Good morning.

18 Q In your testimony you state that you have
19 been with BellSouth for 25 years. Am I correct that
20 you have been with them since you graduated from
21 college?

22 A That's correct.

23 Q And during that time have you ever worked
24 for BAPCO?

25 A No, I have not.

1 Q Do you know who BAPCO is?

2 A Yes, I do.

3 Q Have you worked for any other publishing
4 affiliate?

5 A No, I have not.

6 Q Have you ever worked for an independent
7 publisher?

8 A No.

9 Q Your responsibilities have been with respect
10 to pricing, tariffing, and regulatory support of
11 several different services offered by BellSouth. Does
12 that include directory publishers services?

13 A Yes.

14 Q To what extent?

15 A To the extent that I'm representing
16 BellSouth in this proceeding.

17 Q How about prior to this proceeding?

18 A I have not had an association with
19 publishing prior to the proceeding.

20 Q Were you responsible for the cost studies
21 that have been filed in this case?

22 A No, I was not.

23 Q How about the tariffs?

24 A No, I was not.

25 Q You know Mr. Terry Orman?

1 A I do.

2 Q Do you work for him or with him?

3 A I work with him.

4 Q But you're not directly under him or in his
5 department?

6 A No.

7 Q Okay. You are familiar with the business of
8 an independent publisher?

9 A I'm familiar with publishing to the extent
10 that directories contain White Page listing, and they
11 contain a Yellow Page advertising. I'm not familiar
12 with their business practices.

13 Q Okay. Well, maybe we can cut through
14 several questions. Would you agree that Independent
15 Publishers and BAPCO are competitors?

16 A Yes.

17 Q Okay. Let me turn to your direct testimony.
18 Do you have a copy there?

19 A Yes.

20 Q Turn to Page 3, and you've listed -- do you
21 have that?

22 A Yes.

23 Q You've listed three reasons why BellSouth
24 should not offer a new connect listing; is that right?

25 A Yes.

1 Q The first one being that new connects are
2 not required to publish directories, right?

3 A Correct.

4 Q I believe in your testimony you indicate
5 that BAPCO receives a daily list of service orders or
6 a record of service orders; is that correct?

7 A Yes.

8 Q What does that consist of? What does BAPCO
9 get on a daily basis?

10 A BAPCO receives every service order activity
11 item that occurred in the nine-state BellSouth region.
12 BAPCO receives it in an electronic transmission in an
13 unedited format, every item.

14 Q That would include the new connects, though,
15 wouldn't it?

16 A It would.

17 Q Would the information that BAPCO receives on
18 a daily basis include the name of the subscriber?

19 A Yes.

20 Q The telephone number?

21 A Yes.

22 Q Address?

23 A Yes.

24 Q The type of activity?

25 A Yes.

1 Q What else would that consist of?

2 A It would include any primary business
3 classification.

4 Q Okay. So included within the daily
5 information that BAPCO gets as the new connect, do you
6 know if BAPCO requires that information on a daily
7 basis to publish directories?

8 A I don't know.

9 COMMISSIONER GARCIA: Could you give me an
10 idea of what they use it for?

11 WITNESS JUNEAU: I'm sorry.

12 COMMISSIONER GARCIA: Do you have an idea of
13 what they use it for?

14 WITNESS JUNEAU: I expect that what BAPCO
15 does with it is not to publish directories, but to
16 sell advertising and to distributed directories to new
17 connects to any changes.

18 COMMISSIONER CLARK: Mr. Juneau, would you
19 have a problem with independent publishers having that
20 same opportunity?

21 WITNESS JUNEAU: No.

22 Q (By Mr. Horton) Isn't that what they've
23 asked for?

24 A That is not our understanding. We've had a
25 little bit of a difficult time understanding what the

1 publishers are asking for. That's been the point of
2 negotiations. I believe if we could understand what
3 was asked for, we would be glad to provide that.

4 We have absolutely no objection to the
5 directory publishers having a listing of new connects
6 if it is for the purpose of distributing directories.
7 The tariff has the prohibition against using it for
8 any other purpose, such as telemarketing, and I think
9 we have covered that today. So if the publishers
10 would like it to distribute directors we're very
11 welcome to address that.

12 Q In your second point you indicate that
13 BellSouth should not be required to develop and offer
14 services which customers will not buy in a sufficient
15 quantity at appropriate rates. What would be a
16 sufficient quantity?

17 A I don't know that I can answer that one
18 absolutely. I think that would have to be based on a
19 study of the service and the cost study to determine
20 the recovery of our rates over an appropriate time
21 period, a reasonable time period. To this point,
22 though, we're only aware of one customer who wants a
23 listing of only new connects.

24 Q Have you done anything to market this
25 offering?

1 A Not that I'm aware of. But that's not to
2 say most of our products or services or many of them
3 come to us from our customers. I'm sure if we could
4 think of a good idea, we'd be glad to go out and sell
5 it, but we're also receptive to good ideas that come
6 to us. We're no less willing to sell a service if
7 it's someone else's idea.

8 Q Are there any restrictions on your marketing
9 DPDS or making that available? Do you have any
10 agreements with BAPCO or anybody else that you won't
11 market DPDS or you won't offer --

12 A Not that I'm aware of.

13 Q What would you consider to be an appropriate
14 rate? What is your definition of an appropriate rate?

15 A Appropriate rate would recover our cost plus
16 a reasonable contribution.

17 Q You heard Mr. Screven and I believe your
18 exhibit reflects that the cost --

19 **CHAIRMAN JOHNSON:** Let me interject here.
20 You said would recover your costs and include a
21 reasonable contribution.

22 **WITNESS JUNEAU:** Yes.

23 **CHAIRMAN JOHNSON:** What do you mean by
24 "contribution," I just want to be clear.

25 **WITNESS JUNEAU:** BellSouth should be allowed

1 to earn some measure of profit on the service.

2 CHAIRMAN JOHNSON: Okay.

3 MR. HORTON: I'll come back to the cost in a
4 minute.

5 Q (By Mr. Horton) There's an indication in
6 responses to interrogatories -- not an indication, but
7 I think BellSouth has stated that the prices which the
8 publishers pay are market based. Are you familiar
9 with that?

10 A Yes.

11 Q What do you mean by market based?

12 A It means that the listings that the
13 directory publishers receive have value. As we've
14 heard in the earlier testimony there are basically two
15 choices that seem to be available to the directory
16 publishers that maybe were portrayed as viable
17 choices. One is to buy the listing service from the
18 BellSouth DPDS tariff. The other was to use a tariff
19 that was -- I mean use a directory that was available
20 on the street.

21 If BellSouth's tariff has value such that
22 the publisher would choose to purchase that, I believe
23 a market value is a worthwhile means of pricing the
24 service. And to give maybe a little more definition
25 to that, 100,000 listings was used in an example

Market

1 earlier, a directory with 100,000 listings. At four
2 cents, that directory -- the White Page portion of
3 that directory would cost the independent publisher
4 \$4,000. But with that White Page section, the
5 publisher then has the opportunity to sell thousands,
6 if not hundreds of thousands of dollars of
7 advertising. It seems to have great value to the
8 publishers. It also allows them to avoid the cost of
9 taking a printed directory and then either scanning or
10 in some other fashion reformatting that directory into
11 their own.

12 **COMMISSIONER CLARK:** Mr. Juneau, I'm
13 confused. Are you basing your tariffed rate on market
14 prices or costs plus a reasonable contribution?

15 **WITNESS JUNEAU:** This tariff is based on
16 cost or it's based on a market price that covered the
17 cost of the tariff and it includes contribution.

18 **COMMISSIONER CLARK:** How much is that
19 contribution?

20 **WITNESS JUNEAU:** The contribution, if you
21 calculate it mathematically, is 1300%. I don't
22 disagree with their --

23 **COMMISSIONER CLARK:** You don't characterize
24 that as a reasonable contribution, do you?

25 **WITNESS JUNEAU:** Commissioner, in this

1 regard I think that is a reasonable rate. When you
2 consider --

3 **COMMISSIONER CLARK:** Because that's what the
4 market will bear? Is that your -- is that the basis
5 on which you call it reasonable?

6 **WITNESS JUNEAU:** I would think in this
7 situation, Commissioner, that if this is a market rate
8 it is based on what the market would bear, and then
9 what the market would determine to be a reasonable
10 rate.

11 The rates that I'm aware of that the other
12 LECs and the other BOCs and the major LECs charge are
13 considerably in excess of our rates. Our rate is 4
14 cents, and we've heard quoted 98 cents or 60 cents for
15 a listing in a published directory. The others I'm
16 aware of, the next lowest rate for a magnetic tape
17 delivery is about 15 cents per listing from any other
18 LEC.

19 I think we thought that in filing this our
20 rate was, in fact, very reasonable and very low, and
21 it would be the other LECs that would be upset with
22 our rate, not the directory publishers.

23 **COMMISSIONER CLARK:** What do you charge
24 BAPCO for the same information per listing?

25 **WITNESS JUNEAU:** BAPCO is charged in a

1 different fashion. I don't know that the cost to
2 BAPCO can be related to a per listing. What I do know
3 about BAPCO's charge is it is in excess of what this
4 tariff rate would be.

5 COMMISSIONER CLARK: BAPCO is being charged
6 more than the Florida Independent Directory Publishers
7 for the same information?

8 WITNESS JUNEAU: It's my understanding that
9 BAPCO's agreement is in excess of the DPDS on an
10 equivalent listing basis.

11 COMMISSIONER CLARK: Thank you.

12 Q (By Mr. Horton) Mr. Juneau, while we're on
13 that, would you refer to Interrogatory No. 32, which
14 is in the exhibits we just identified. Page 39 of
15 that exhibit. Do you have that?

16 A Yes.

17 Q The response says that, "BellSouth telephone
18 prices for these services are market based. For the
19 companies BSC has knowledge of, BSC's prices are
20 competitive compared to similar offerings."
21 Competitive with whom?

22 A Competitive with the other RBOCs and LECs
23 that would be providing directory listings.

24 Q Are they competing with you to provide
25 Directory Publishers information with respect to

1 BellSouth subscriber information?

2 A In our franchise area today I'm not aware of
3 that. We provide, of course, directory -- provide
4 directory listings to BAPCO and then we provide them
5 to the independent publishers in our area. Now, in
6 the future your question may have relevance. I can
7 only speak to the provision of directory listings for
8 BellSouth customers.

9 Q Who are your competitors today for the
10 provision of subscriber information to independent
11 publishers?

12 A I do not know of another party that has a
13 product that markets it as such. We have mentioned
14 earlier such items as Chamber of Commerce, Welcome
15 Wagon, realtor organizations as other sources of
16 information, but if they market it as directory
17 information I'm not aware.

18 Q Do you know if those other sources charge
19 for any of that information?

20 A I do not know.

21 Q Would you agree that BellSouth has the most
22 accurate, up-to-date directory listing information
23 among whatever sources from which such data is
24 available?

25 A I would.