

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AR 464

In the Matter of a Proposed Rule Regarding
Telephone Directory "Blue Pages"

SUPPLEMENTAL COMMENTS OF
QWEST CORPORATION

Qwest Corporation ("Qwest") respectfully submits these supplemental comments, responding to the oral comments of the City of Portland (the "City") at the rulemaking hearing held this day. Qwest has not received the City's written comments, because the City chose neither to serve them electronically nor to distribute them at the hearing. Nevertheless, Qwest is compelled to respond briefly to the City's oral comments.

One of the City's main points is that the Commission should issue a rule requiring telecommunications utilities to continue to publish government listings in the blue pages because that is important to facilitate citizens' access to government, and the Commission should not trust Dex or telecommunications utilities to continue to publish the blue pages. What the City failed to inform the Commission is that it is also operating as a competitive provider of telecommunications services to customers primarily consisting of government entities. Thus, the City's comments are motivated by self-interest, which both demonstrates the City's bias and further underscores the unfairness of the proposed rule in a competitive environment.

The City is certified by the Commission as a competitive provider and operates its CLEC business under the assumed name Integrated Regional Network Enterprise or IRNE. The City advertises the following government entities as its current customers:¹

¹ <http://www.irnet.net/customers.htm>.


- ComNet (Portland's Bureau of Communications and Networking)
- TriMet (Tri-County Metropolitan Transportation Agency)
- PDOT (Portland's Department of Transportation)
- ODOT (Oregon's Department of Transportation)
- Mount Hood Cable Regulatory Commission
- Office of Cable Communications and Franchise Management
- State of Oregon DAS (Department of Administrative Services)
- Portland Public Schools
- Portland State University
- Multnomah County
- Multnomah Education Service District
- City of Gresham
- Portland Community College

When the City states it is important that citizens have access to the telephone numbers of their governments, to a significant extent they are referring to themselves and other governments that are IRNE's customers. In other words, many of the listings that the City wants included in telecommunications utilities' specialized directories are the City's customers, not the utilities' customers. The City, however, does not seem to think it is appropriate for IRNE to incur the expense to provide such specialized directories. Rather, the City thinks it is essential that telecommunications utilities and independent publishers provide a specialized directory that includes the government entities that are the City's own customers. While Dex has indicated that it intends to continue to provide such government listings in the current blue pages format, because it makes its directories a more useful product, it is inappropriate for the City, as a

competitive provider, to insist that such obligations be imposed on telecommunications utilities by a Commission rule.

DATED: February 8, 2005.

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By 

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CERTIFICATE OF SERVICE
AR 464

I hereby certify that on this day I served the foregoing **Supplemental Comments of Qwest Corporation** on the following persons by causing to be emailed and mailed a true copy thereof, contained in a sealed envelope, with postage prepaid, addressed to said persons at the following addresses and deposited in the post office at Portland, Oregon, on this day:

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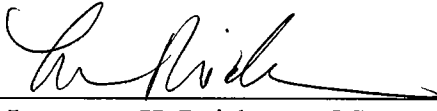
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