

Brooks E. Harlow
brooks.harlow@millernash.com
(206) 777-7406 direct line

3400 U.S. Bancorp Tower
111 S.W. Fifth Avenue
Portland, OR 97204-3699
(503) 224-5858
(503) 224-0155 fax

500 E. Broadway, Suite 400
Post Office Box 694
Vancouver, WA 98666-0694
(360) 699-4771
(360) 694-6413 fax

March 2, 2005

VIA FEDERAL EXPRESS

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE, #215
Salem, Oregon 97308-2148

Subject: OPUC Docket No. AR 464

Attention: Filing Center

Enclosed, for filing, are an original and five copies of the Supplemental Comments Of Dex Media, Inc., in the above-referenced docket.

Very truly yours,



Brooks E. Harlow

cc w/enc: All Parties of Record

CERTIFICATE OF SERVICE
AR 464

I hereby certify that a true and correct copy of the foregoing has been e-mailed and mailed, contained in a sealed envelope, with postage prepaid, addressed to the following:

TIM BAUER
DEX MEDIA INC
198 INVERNESS DR W
ENGLEWOOD CO 80112
tim.bauer@dexmedia.com

DEBORAH BOONE
OREGON STATE LEGISLATURE
900 COURT ST NE 376
SALEM OR 97301
rep.doborahboone@state.or.us

DAVID BRAGDON
METRO
600 NORTHWEST GRAND AVE
PORTLAND OR 97232-2736

ROB DRAKE
CITY OF BEAVERTON
PO BOX 4755
BEAVERTON OR 97076

JOHN R DUTT
PORTLAND OFFICE OF NEIGHBORHOOD
INVOLVEMENT
1221 SW 4TH AVE - RM 110
PORTLAND OR 97204
jdutt@ci.portland.or.us

GEORGE GROSCH
OR211 PROJECT MANAGER
720 SE ATWOOD AVE
CORVALLIS OR 97333
or211@comcast.net

GLENN R HARRIS
SPRINT/UNITED TELEPHONE CO OF
THE NORTHWEST
902 WASCO ST
HOOD RIVER OR 97031
glenn.harris@mail.sprint.com

SHEILA HARRIS
QWEST CORPORATION
421 SW OAK RM 810
PORTLAND OR 97204
sheila.harris@qwest.com

PAUL HAUER
BEAVER CREEK COOPERATIVE TELEPHONE CO
15223 S HENRICI RD
OREGON CITY OR 97045
phauer@bctelco.com

JOSETTE HUGO
PO BOX 751
SCAPPOOSE OR 97056

SHELLEY JENSEN
VERIZON
PO BOX 1100
BEAVERTON OR 97075-1100
schelly.jensen@verizon.com

JIM LONG
PO BOX 33
NORTH PLAINS OR 97133-0033
jimalong@pcez.com

JULIE MIKALSON
7111 NE 9TH AVE
PORTLAND OR 97211
mikalsen2002@yahoo.com

DAVID OLSON
CITY OF PORTLAND
1211 SW 5TH AVE RM 1305
PORTLAND OR 97204-1930
davido@ci.portland.or.us

LAWRENCE REICHMAN
PERKINS COIE LLP
1120 NW COUCH ST - 10 FL
PORTLAND OR 97209-4128
reichman@perkinscoie.com

MARY LOU RITTER
WASHINGTON COUNTY
133 SE SECOND AVE
HILLSBORO OR 97123-4026

JERI SHUMATE
211INFO
621 SW ALDER - STE 810
PORTLAND OR 97205
contact@211info.org

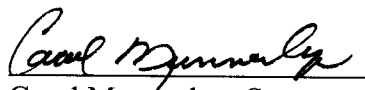
MICHAEL T WEIRICH
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@state.or.us

LIESL WENDT
UNITED WAY
5629 SE HOLGATE BLVD
PORTLAND OR 97206
lieslwendt@msn.com

BRANT WOLF
OREGON TELECOMMUNICATIONS ASSN
707 13TH ST SE STE 280
SALEM OR 97301-4036
bwolf@ota-telecom.org

JACQUELINE ZIMMER
OREGON ASSC OF AREA AGENCIES
ON AGING & DISABILITY
PO BOX 12189
SALEM OR 97309

Dated at Seattle, Washington this 2nd day of March, 2005.



Carol Munnerlyn, Secretary

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

Docket No. AR 464

IN THE MATTER OF A PROPOSED
RULEMAKING FOR INCLUSION OF
HUMAN SERVICES LISTINGS IN
TELEPHONE DIRECTORIES. PETITION
FILED BY JIM LONG.

SUPPLEMENTAL COMMENTS OF DEX
MEDIA, INC.

REQUEST TO SUBMIT SUPPLEMENTAL COMMENTS

Dex Media, Inc. ("Dex"), respectfully requests that the Commission consider these supplemental comments even though they are filed after the deadline for comments. These comments follow up on supplemental comments filed by the City of Portland ("City") on February 16, 2005, also after the stated deadline. These comments also provide an update regarding facts and circumstances occurring after the deadline. Accordingly, Dex could not have filed these comments by the time of the deadline. Additionally, although these comments propose to address a very narrow issue, Dex believes that clarification on the issue would be helpful to the Commission's understanding of the situation addressed by the City.

PROPOSED SUPPLEMENTAL COMMENTS

On the second page of its supplemental comments, the City stated that its staff spent many hours working "extensively with Dex staff" to ensure accuracy of the City's blue pages listings. The City then described numerous errors that the City found in its listings in the

blue pages of Dex's Portland directory. Dex was understandably concerned about these allegations, which were very specific, and contacted the City within the last two weeks.

By working with the City as well as conducting its own internal investigation, Dex has determined that the City was correct regarding the allegation of numerous erroneous listings. However, in the meetings before the Portland director was published, the City staff met with *Qwest* personnel, *not Dex* personnel as the City stated.¹ Dex understands that the City's error in identifying Dex was inadvertent.² Dex also learned that the listings were published incorrectly due to human error by Dex, not any error by Qwest in compiling the listings.

Errors of the magnitude such as occurred this year with Portland's listings, while relatively infrequent, are not unprecedented. Every year out of the 300 directories that Dex publishes, a few will have errors that merit corrective action by Dex. When errors such as this occur, it is Dex's practice to mail replacement corrected directory pages to subscribers in the affected area. The corrected pages are designed to be inserted in the existing directories so that customers will have correct listings for the remainder of the life cycle of the particular directory. Moreover, Dex is also in the process of correcting its online directory.

Pursuant to Dex's standard practice, Dex has made a business decision to prepare and mail corrected listings for the City of Portland. These corrected listings will be in the form of blue pages inserts to the 2005 Portland directory. Dex will print a quarter million insert pages and will mail inserts, together with an explanatory cover letter, to all subscribers in the Portland area. The entire process will take place over the next four to six weeks to produce the letter and replacement pages, depending on printers' schedules. Dex notes that this rulemaking proceeding was not what caused the corrective action that Dex is undertaking. As Dex's representatives in

¹ This was as Dex expected, since it is Qwest who compiles listings for the blue pages.

² Although Dex has been a separate company from Qwest for a couple of years, many people still consider them to be one in the same.

this docket learned after they looked into the City's supplemental comments, the process of investigating and correcting the errors was already underway between the City and Dex at a staff level.

Finally, as Dex stated at the public hearing, it does care about the quality and competitiveness of its products. In particular, Dex strives to make its directories as accurate as humanly possible. When errors occur—as they will in any human endeavor—Dex takes appropriate corrective action, as illustrated by the follow-up to the problems with the City of Portland's 2005 listings.

CONCLUSION

Dex will correct the Portland directory at considerable expense because Dex believes that its directory products must continue to be the most complete, accurate, and preferred available in the marketplace. Dex's actions demonstrate that market forces already drive directory publishers to act responsibly and in the public interest. Regulation would be a less effective substitute for market forces at best or a hindrance at worst.

Respectfully submitted this 2nd day of March, 2005.

MILLER NASH LLP



Brooks E. Harlow

Attorneys for Dex Media, Inc.