

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**AR 464**

In the Matter of a Proposed Rule	)	Supplemental Comments
Regarding Telephone Directory	)	of City of Portland
“Blue Pages”	)	

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The City of Portland (“City”) respectfully submits these supplemental comments in response to the supplemental comments of Qwest Corporation filed in this proceeding, dated February 8, 2005.

The City has previously electronically filed written comments in this proceeding, dated February 7, 2005, hard copies of which were provided to Administrative Law Judge Allan Arlow at the hearing on this matter held February 8, 2005.<sup>1</sup> Qwest’s comments that the City has not filed its comments electronically nor distributed them at the hearing are in error.

Qwest’s supplemental comments, among other things, identify the City as a competitive provider of telecommunications services through its “IRNE” system to certain government entities.<sup>2</sup> Qwest asserts that many of the listings the City wants included in the “Blue Pages” are “the City’s customer’s, not the utilities’ customers.”

Qwest’s implication that the City identifies and provisions its own phone numbers, or provides voice telephone services to other participating IRNE governmental clients is simply false. The City in fact pays Qwest retail rates to purchase access to the public, switched telephone network. The phone numbers used by the City are owned and assigned by Qwest, and the City pays Qwest for their dedicated use.

Contrary to Qwest’s assertion, IRNE provides only data services to its third-party customers, and has never provided or provisioned traditional voice services to any entity outside the City itself. Nor has IRNE or its customers ever assumed or requested

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<sup>1</sup> The City’s previously-filed written comments are posted on the Oregon Public Utility Commission eDocket website at <http://www.puc.state.or.us/edockets/docket.asp?DocketID=10747> (visited February 11, 2005).

<sup>2</sup> “IRNE” is the acronym for “Integrated Network Regional Enterprise”. See <http://www.irnet.net/>

responsibility for providing or publishing government telephone listings, which the City and IRNE customers continue to pay retail rates to Qwest and Dex Media to provide.

With respect to the issue of accurate and up-to-date government listings, City staff spent many hours last year working extensively with Dex staff to achieve the goal of ensuring that the City's phone numbers, owned by Qwest and listed by Dex, were accurate. This effort included the additional step of the City arranging with Dex to review actual proof pages for approval prior to publication. Unfortunately, despite the effort and staff hours involved, the information Dex ultimately published in the 2005 Portland-area Dex directory did not match the proofs provided earlier to the City. The City estimates that 33%-45/% of the City's listings in the current Dex directory are erroneous as a result of this oversight.

In conclusion, Qwest's supplemental comments in this proceeding are factually inaccurate. The City believes that corrections of these factual misstatements are necessary to avoid misleading the Commission in this proceeding.

In conclusion, the City of Portland reiterates its strong support for the Commission's adoption of a "Blue Pages Rule", with the specific improvements set forth in our earlier written testimony in this docket.

Respectfully submitted,

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David C. Olson, Director  
Office of Cable Communications & Franchise Management  
City of Portland, Oregon

February 15, 2005