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June 29, 2020

Ms. Tanowa Troupe
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3794

RE: Letter in Support of AT&T's Request for Waiver

Dear Ms. Troupe:

CenturyTel of Ohio, Inc. d/b/a CenturyLink, United Telephone Company of Indiana, Inc. d/b/a CenturyLink and United Telephone Company of Ohio d/b/a CenturyLink (hereafter jointly referred to as CenturyLink¹ support AT&T's request for a waiver of O.A.C. Section 4901:1-6-15(B) to permit the provision of telephone directories in electronic format.

CenturyLink's experience with a declining and limited customer demand for printed telephone directories is consistent with that of AT&T. CenturyLink has had a consistently steady decline in the requests for such printed directories, year-over-year, since at least 2016. Just as AT&T is seeing its demand for printed directories dwindling, CenturyLink's experience in the marketplace is in lock-step.

State commissions around the country have recognized that better directory information is available online, and that limited demand for printed directories no longer justifies the cost and administrative burden of providing them, including Alabama, Arkansas, Georgia, Florida,

¹ CenturyLink operates in Ohio pursuant to authorizations granted to other, non-ILEC affiliate companies: Broadwing Communications, LLC, CenturyLink Communications, LLC, Global Crossing Local Services, Inc., Global Crossing Telecommunications, Inc., Level 3 Communications, LLC, Level 3 Telecom of Ohio, LLC, TelCove Operations, LLC and WilTel Communications, LLC.

Illinois, Indiana, Kansas, Kentucky, Louisiana, Mississippi, Missouri, North Carolina, Oklahoma, South Carolina, Tennessee, Texas and Wisconsin. The elimination of the regulatory requirement to provide printed directories in these other states is not surprising, given that more and more customers are leveraging alternative sources for their directory requests, which are more timely and convenient, such as on-line access via www.whitepages.com or www.therealyellowpages.com, listings populated on maps like Apple Maps or Google Maps, and powerful search engines like Google, Yahoo! and Bing.

CenturyLink urges the Commission grant this waiver consistent with the flexibility envisioned by Substitute Senate Bill 162 (2010) that requires the provision of a directory in “any reasonable format.” The most reasonable format, given the decline in requests for printed directories, is to allow all ILECs to satisfy their 4901:1-6-15(B) requirement by referring their BLES customers to eco-friendly and continually updated directories available electronically on-line.

Should you have questions or require additional information regarding this filing, please contact me at (614) 441-0393.

Sincerely,

A handwritten signature in blue ink, appearing to read "Josh S. Motzer". The signature is fluid and cursive, with the first name "Josh" being the most prominent.

Josh S. Motzer
State Government Relations Director

This foregoing document was electronically filed with the Public Utilities

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Summary: Correspondence in support of waiver application of AT&T Ohio electronically filed by Mr. Joshua S Motzer on behalf of United Telephone Company of Ohio d/b/a CenturyLink and CenturyTel of Ohio d/b/a CenturyLink and United Telephone Company of Indiana, Inc. d/b/a CenturyLink