

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Cincinnati Bell Telephone Company LLC)	
For Waiver of Certain Minimum)	
Telephone Service Standards)	Case No. 08-1197-TP-WVR
Pursuant to Chapter 4901:1-5, Ohio)	
Administrative Code.)	

**APPLICATION OF CINCINNATI BELL TELEPHONE COMPANY LLC FOR
WAIVER OF MINIMUM TELEPHONE SERVICE STANDARD 4901:1-5-03(B)**

Cincinnati Bell Telephone Company LLC ("CBT") hereby requests a waiver of Commission Rule 4901:1-5-03(B), the Minimum Telephone Service Standards ("MTSS") dealing with supplying printed telephone directories to LEC customers. CBT proposes more progressive and environmentally-friendly methods of providing customers with directory options which are superior in several ways to the current printed directory.

Commission MTSS Rule 4901:1-5-03(B) currently requires that local exchange carriers annually supply their customers with directory information through one of two means: either a printed directory, or through free directory assistance:

(B) Local exchange carriers (LECs) shall annually supply their customers with directory information through one of the following means:

(1) A printed directory(ies) that must include, at a minimum, all published telephone numbers in current use within the ILEC local calling area. Upon a customer's request, each LEC shall provide, free of charge, an applicable directory(ies) for all exchanges which are within the ILEC local calling area, including any exchanges that are within the local calling area as a result of extended area service. The printed directory shall be provided free of charge to customers. LECs may give customers the option to request an electronic directory, where available, in lieu of a printed directory, but if they make this option available, LECs must, in this instance, provide the electronic directory at no charge.

(2) Free directory assistance for all published telephone numbers in current use within the ILEC local calling area. In addition, the LEC shall include on its web site the printed information required by paragraph (C) of rule 4901:1-5-03 of the Administrative Code. An annual notice shall also inform customers that, in lieu of a printed directory, they will be provided free directory assistance for all telephone numbers in current use within their local calling area.

The traditional method of providing customers with directory information has been to print an alphabetical listing of all customers and to automatically deliver¹ a copy to every individual customer location (with multiple copies to businesses). This system did little or nothing to assess the usefulness of such directories, which have more or less been taken for granted, or the efficiency of this practice, which annually consumes millions of pages of paper, gallons of ink, and the associated energy to create those materials, print the directories and distribute them to customers.

To keep abreast of the latest in technology and customer service, CBT periodically reviews how customers actually use services and what changes they might like to see in the future. CBT has recently considered ways to improve the White Pages telephone directory. CBT believes that most customers seldom use the White Pages directory and that a sizeable and growing number of customers find the paper directory unnecessary.

CBT has also been investigating various “green” initiatives to look for ways to conserve energy and other natural resources. A natural target of this program would be the printed directory. It does not make a lot of sense to print and distribute directories to customers who do not want or use them. Significant resources could be saved if, instead of automatically providing all customers with a printed directory with the option to request an electronic directory,

¹ Technically, the Rule does not require the LEC to deliver the directory. Ohio Admin. Code § 4901:1-5-03(B)(1). Therefore, CBT may not actually be seeking a “waiver” of the Rule so much as an interpretation that would allow CBT to discontinue automatic delivery and to make the electronic directory the preferred option absent a customer request for a printed directory. Printed directories would still be readily available at CBT retail stores to anyone who requests one.

customers were automatically provided access to an electronic directory with the option to request a paper directory. However, this is currently not an express option under the Commission's MTSS rules. While Commission Rule 4901:1-5-03(B)(1) allows a LEC to give customers the option to *request* an electronic directory in lieu of a printed directory, this rule requires that the customer affirmatively request an electronic directory first. Because of natural inertia, most customers will not take affirmative action to stop the delivery of a paper directory even if they do not want to receive it. And, the way directories are currently distributed by automatically delivering one to every location in the service territory and many copies to businesses, it is not practical to "suppress" delivery to only select locations. Through this filing, CBT seeks to make an electronic directory the preferred option for delivering directory listings. No printed directories would be delivered automatically. Customers who do not really want or need a paper directory are unlikely to affirmatively request one. That way, resource usage would be paired more efficiently with customer needs and desires—only those who want paper directories will request and receive them, avoiding the unnecessary waste of paper, energy and other resources that are consumed to produce, distribute, discard and/or recycle hundreds of thousands of books. And customers will get to choose how they want their directory provided.

In the modern information age, an annually printed telephone directory is somewhat of an anachronism. The book is out of date before it is even published because of changes to subscriber listings between the date that the directory closes (usually in March) and the time the books are delivered to customers (usually in June). The book grows more and more dated as the year goes on. People have become increasingly accustomed to obtaining their information needs online nearly instantaneously. Customers already use Internet search tools to locate telephone numbers. CBT believes that most customers use the printed White Pages directory infrequently,

if at all. Customers are more likely to use the Yellow Pages (an unregulated advertising directory which also includes alphabetical business listings) to find business listings than the White Pages, the regulated directory required by the Commission's rules. With changes in technology and more widespread Internet access, many customers prefer having the telephone directory in an electronic form, which is not only up to date on a daily basis, but searchable. If printed directories are going largely unused, distributing a printed directory to every customer every year is causing an enormous waste of paper, contributing to the premature exhaustion of landfills and, even for those who do recycle the books, is still wasting considerable energy and other resources to create and distribute books, only to recycle them and repeat the process the next year.

CBT believes it has come up with improved options to fit customers' needs with respect to directories. Later this Fall, CBT will launch an electronic version of its White Pages directory that will be available free to anyone over the Internet. This directory will be updated daily, just like the directory assistance database, so that it is always current. The online directory would contain all of the Customer Guide information that is required to be included in the printed directory. See Rule 4901:1-5-03(C). In addition to being environmentally friendly, the electronic directory will also be superior to the printed book in several other ways: it will always be current as of the previous business day, while the printed book never is totally current; it is searchable electronically, while the printed book can only be consulted manually by reviewing alphabetical listings; it is accessible anywhere there is Internet access, even over cell phones and PDAs, while the printed directory is bulky and heavy and not convenient to carry around; and, to keep directory size manageable the print has to be kept small, while an electronic directory allows the customer to enlarge the type as much as desired.

CBT will conduct an extensive informational campaign for its customers to educate them on the availability of the electronic directory. CBT will use bill inserts and billing messages to promote its new, easy to use, “green” edition of the directory. CBT will also send e-mail messages to its Internet service customers and text messages to its wireless affiliate’s customers. Information will be posted on the Cincinnati Bell website and in retail stores. Customers will be made well aware of how to access and use the on-line electronic directory. CBT believes that many customers will be pleased to have this new means of accessing directory listings.

Of course, CBT understands that certain customers will still want or need a paper directory, which would not be eliminated. CBT would continue to make printed directories available to any customer who requests one. The preferred method of distributing printed directories to those who request copies would be for the customer to visit a CBT retail store to pick one up. For those customers who cannot visit a retail store, an alternative method of shipping or delivering the printed directories will be used to get the customer a book promptly upon request.

For these reasons, CBT requests that the Commission grant CBT a waiver of Rule 4901:1-5-03(B)(1) to the extent it would require that a customer affirmatively request an electronic directory in order for CBT not to deliver a printed directory and to allow CBT to only provide a printed directory to Ohio customers upon their specific request.

Respectfully submitted,

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Summary: Application of Cincinnati Bell Telephone Company LLC For Waiver of Minimum Telephone Service Standard 4901:1-5-03(B) electronically filed by Mr. Douglas E. Hart on behalf of CINCINNATI BELL TELEPHONE COMPANY