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Witness: Scott Feder

Type of Exhibit: Direct Testimony

Sponsoring Party: CenturyTel of Missouri,
LLC and Spectra Communications Group,
LLC d/b/a CenturyTel

Case No.: TO-2006-0299

Date Testimony Prepared:
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**CENTURYTEL OF MISSOURI, LLC AND SPECTRA
COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL**

DIRECT TESTIMONY

OF

SCOTT FEDER

CASE NO. TO-2006-0299

OF THE STATE OF MISSOURI

PETITION OF SOCKET TELECOM, LLC)
FOR COMPULSORY ARBITRATION OF)
INTERCONNECTION AGREEMENTS)
WITH CENTURYTEL OF MISSOURI, LLC)
AND SPECTRA COMMUNICATIONS, LLC)
PURSUANT TO SECTION 252(b)(1) OF)
THE TELECOMMUNICATIONS ACT OF)
1996)

CASE NO. TO-2006-0299

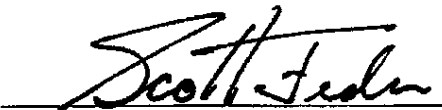
STATE OF LOUISIANA

PARISH OF OUACHITA

AFFIDAVIT OF SCOTT FEDER

I, Scott Feder, of lawful age and being duly sworn, state:

1. My name is Scott Feder. I am presently Director for CenturyTel Service Group, LLC
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.



Scott Feder

Subscribed and sworn to before this 17 day of March, 2006.

My Commission expires: At Death

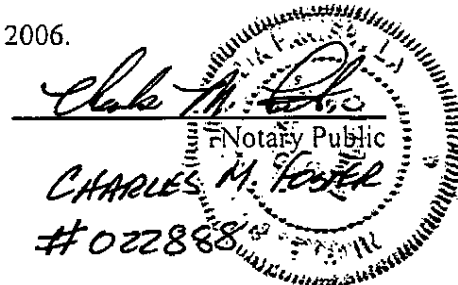


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1 **DIRECT TESTIMONY OF SCOTT FEDER**
2

3 **I.**
4 **INTRODUCTION**

5 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS**

6 A. My name is Scott Feder. My business address is 100 CenturyTel Drive, Monroe,
7 Louisiana 71211.

8 **Q. ON WHOSE BEHALF ARE YOU SUBMITTING DIRECT TESTIMONY?**

9 A. I am submitting direct testimony on behalf of CenturyTel of Missouri, LLC and Spectra
10 Communications Group, LLC, collectively referred to herein as "CenturyTel."

11 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?**

12 A. I am the Director - Yellow Pages for CenturyTel Service Group LLC, a subsidiary of
13 CenturyTel, Inc.

14 **Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?**

15 A. As Director – Yellow Pages, I'm responsible for managing the directory product line,
16 which is comprised of 215 telephone directories, containing both alphabetical (white
17 pages) listings and a classified (yellow pages) section in 22 states. My primary
18 responsibility is to oversee the marketing, production, printing, and distribution of
19 directories in both print and electronic formats on behalf of all of the CenturyTel
20 telephone operating companies.

21 **Q. PLEASE DESCRIBE YOUR PREVIOUS WORK EXPERIENCE.**

22 A. My background involves strategic planning, new product development, and marketing
23 management, with the last twelve years focused exclusively on the telephone directory
24 business. Overall, I have fourteen years of experience working with telecommunications

1 companies including Strategic Telecom, GTE Directories, Citizens Communications, and
2 Frontier Corporation prior to joining CenturyTel in 2004. I served as Group Product
3 Manager at GTE Directories' corporate headquarters, where I managed a large portfolio
4 of directories and had assumed responsibility for LEC relations and for CLEC activities
5 as they related to the directories business. I joined Citizens Communications in 1998 as
6 Product Director and had general management responsibilities for the end-to-end
7 directory operations, much like my position today with CenturyTel.

8 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS?**

9 A. No, I have not. However, I have been deposed in litigation matters relating to directories
10 in Alabama.

11 **II.**
12 **EXECUTIVE SUMMARY**

13 **Q. WHAT ISSUES DO YOU DISCUSS IN YOUR TESTIMONY?**

14 A. I provide testimony on issues related to directories and listings management.

15 **Q. WHAT ARE THE PRIMARY AREAS OF DISPUTE WITH THE DIRECTORIES**
16 **AND LISTINGS MANAGEMENT ISSUES YOU ADDRESS IN YOUR**
17 **TESTIMONY?**

18 A. There are several disputes involving directories and listings management. The first
19 dispute concerns Socket's proposed language that would obligate CenturyTel to provide
20 classified listings to Socket's business customers at no charge. While CenturyTel is
21 prepared to work with Socket to negotiate a separate agreement regarding non-regulated
22 directory services, CenturyTel has no obligation under the Act to provide the non-
23 regulated directory services requested by Socket or to do so at no charge.

24 The second issue involves the rates at which CenturyTel will provide foreign or
25 other listings in the White Pages directory, as well as the charge associated with an

1 election by a Socket customer to have a non-published listing. Socket has suggested that
2 the rates charged for those services should be the tariff rate less an applicable wholesale
3 resale discount. CenturyTel does not agree and has asserted that the tariff rate is the
4 appropriate rate. Socket has also insisted on including what it refers to as “enhanced”
5 listings in this category. Within CenturyTel’s operations, an “enhanced” listing is a non-
6 regulated directory service and is, therefore, not a tariff item.

7 Other significant issues involve Socket’s insistence that CenturyTel develop a
8 mechanized or electronic process for the submission of listings information and the
9 related process associated with the nature, format, time frames, and costs for listings
10 verification reports. CenturyTel does not have a mechanized process and the ICA should
11 not include an obligation to develop such a costly process simply because Socket wants
12 its listings handled in that manner.

13 A final issue pertains to Socket’s request for CenturyTel to be the single point of
14 contact for provisioning of directory listings to third parties, including third party
15 directory publishers. CenturyTel’s ability to provide this service is dependent on the
16 procedures that the parties agree to follow for Socket to deliver its subscriber listings
17 information to CenturyTel.

18 **III.**
19 **CLASSIFIED LISTINGS**

20 **ISSUE 1: SHOULD CENTURYTEL BE OBLIGATED TO PROVIDE**
21 **CLASSIFIED LISTINGS TO SOCKET’S BUSINESS CUSTOMERS AT NO**
22 **CHARGE?**

23 **Q. WHAT IS THE NATURE OF THE ISSUE RAISED BY SOCKET REGARDING**
24 **CLASSIFIED DIRECTORIES?**

1 A. Socket has proposed language in several provisions that includes references to classified
2 listings in the directories, in addition to the alphabetical or white pages. While
3 CenturyTel agrees that its obligations regarding the alphabetical or white pages
4 directories should be included within the terms and conditions of the ICA, the ICA
5 should not address issues related to non-regulated directory services such as the
6 publication and contents of classified/yellow pages directories. Such non-regulated
7 services are not within the scope of the FTA or CenturyTel's obligations thereunder and,
8 therefore, should not be imposed on CenturyTel under the auspices of the parties'
9 interconnection agreement.

10 **Q. WHAT IS SOCKET ASKING CENTURYTEL TO DO WITH REGARD TO**
11 **YELLOW PAGES?**

12 A. Socket demands that CenturyTel provide classified/yellow pages listings to Socket's
13 business customers at no charge in an equivalent quantity and type to CenturyTel's own
14 business customers receive.

15 **Q. WHY IS SOCKET'S PROPOSAL INAPPROPRIATE?**

16 A. First, as indicated above, the purpose of the ICA is to address the parties' relationship
17 with regard to regulated services, not non-regulated directory services such as
18 classified/yellow pages listings. Second, CenturyTel's business customers receive, as a
19 part of CenturyTel's business or B1 class of tariff service, a listing in the classified
20 section of the appropriate directory. In other words, CenturyTel's business customers, in
21 effect, pay for the classified listing as a part of the tariff for the B1 class of service.
22 Consequently, the business listings are not "no charge" listings as requested by Socket.
23 Finally, Socket's request that it receive an "equivalent quantity" belies the fact that
24 Socket may have either significantly fewer or greater business customers than

CenturyTel. Not only is Socket's reference to "equivalent quantity" misplaced, its demands are fatally flawed in attempting to improperly extend the FTA to include non-regulated services and in attempting to compel CenturyTel to provide Socket-specific services without any method of cost recovery.

Q. WHY DOES CENTURYTEL BELIEVE THAT YELLOW PAGES SHOULD NOT BE ADDRESSED IN THE ICA?

A. Yellow Pages is a non-regulated directory service and, as such, is not subject to arbitration and administration by the Commission. Consequently, any negotiations between Socket and CenturyTel—and any subsequent agreement resulting from those negotiations—are outside the scope of the ICA.

IV.

FOREIGN, OTHER LISTINGS, AND NON-PUBLISHED LISTINGS

ISSUE 2: AT WHAT RATES SHOULD CENTURYTEL BE REQUIRED TO PROVIDE NON-PUBLISHED LISTING AND FOREIGN OR OTHER LISTINGS IN THE WHITE PAGES DIRECTORY?

Q. WHAT IS A FOREIGN OR OTHER LISTING?

A. A foreign listing is a tariff item that enables a customer located outside a directory coverage area to have an alphabetical listing within the white pages. And, because the listing is "foreign," the service is not associated with the provision of local telecommunications service. An "other" listing is a tariff item that includes such things as an extra line of information, an alternate call number, or cross reference.

Q. CAN YOU DESCRIBE THE ISSUE REGARDING FOREIGN OR OTHER LISTINGS IN THE WHITE PAGES AS PRESENTED BY SOCKET?

A. Yes. Socket is proposing that where its retail end users require foreign or other listings, CenturyTel will charge Socket at CenturyTel's tariff rate less the applicable wholesale resale discount. The wholesale discount would not apply to any foreign or other listing

1 because these services are not associated with the provision of local telecommunication
2 service. This decision was recently confirmed by the Missouri Commission in the M2A2
3 proceeding.

4 **Q. IS SOCKET'S ISSUE REGARDING NON-PUBLISHED LISTINGS SIMILAR?**

5 A. Yes. Socket is also seeking the application of the wholesale resale discount to non-
6 published listings, regardless of their status as a resale or facilities-based customer.

7 **Q. WHY IS SOCKET'S POSITION REGARDING THE APPLICATION OF A**
8 **WHOLESALE RESALE DISCOUNT TO CENTURYTEL'S TARIFF RATES**
9 **UNREASONABLE?**

10 A. Allowing Socket to apply a wholesale resale discount operates to create an unfair
11 competitive advantage to Socket in the marketplace.

12 **Q. WHAT RATE SHOULD SOCKET BE REQUIRED TO PAY FOR FOREIGN,**
13 **OTHER LISTINGS, AND NON-PUBLISHED LISTINGS?**

14 A. Socket should be required to pay the full tariff rate for those services, just like
15 CenturyTel's own customers.

16 **Q. WHAT IS AN ENHANCED LISTING?**

17 A. Within the directory publishing industry, an "enhanced" listing is a non-tariff item
18 offered by the directory publishers, such as bold or featured listings.

19 **Q. WHAT IS SOCKET'S POSITION REGARDING ENHANCED LISTINGS?**

20 A. Socket is attempting to include enhanced listings as if they are a tariff item, much like
21 foreign and other listings.

22 **Q. WHY IS IT INAPPROPRIATE TO INCLUDE ENHANCED LISTINGS IN THE**
23 **SAME CATEGORY AS FOREIGN AND OTHER LISTINGS?**

24 A. Although an enhanced listing appears within the alphabetical section of a directory,
25 unlike foreign and other listings, an enhanced listing is a non-regulated directory service
26 and is not available via tariff.

1 **Q. WHY IS CENTURYTEL'S POSITION TO EXCLUDE ENHANCED LISTINGS**
2 **FROM THE ICA MORE REASONABLE?**

3 A. CenturyTel's position is that the ICA should only govern regulated issues between the
4 parties. As stated above, enhanced listings are non-regulated directory services that are
5 not available via tariff to Socket or to CenturyTel's own customers. Therefore, they do
6 not belong in the ICA.

7 **V.**
8 **METHODOLOGY FOR LISTINGS DELIVERY**

9 **ISSUE 3: SHOULD CENTURYTEL BE REQUIRED TO DEVELOP A**
10 **MECHANIZED OR ELECTRONIC PROCESS FOR THE SUBMISSION OF**
11 **LISTINGS INFORMATION?**

12 **ISSUE 4: WHAT IS THE PROPER PROCESS FOR THE SUBMISSION OF**
13 **LISTINGS INFORMATION AND THE RELATED PROCESS ASSOCIATED**
14 **WITH THE NATURE, FORMAT, TIME FRAMES, AND COSTS FOR LISTINGS**
15 **VERIFICATION REPORTS?**

16 **Q. WHAT IS THE NATURE OF THE DISPUTE BETWEEN SOCKET AND**
17 **CENTURYTEL REGARDING THE METHODOLOGY FOR SOCKET TO**
18 **PROVIDE SUBSCRIBER LISTINGS INFORMATION TO CENTURYTEL?**

19 A. The basic nature of the dispute regarding the methodology for Socket to provide
20 subscriber listings is Socket's insistence on using a mechanized process for the delivery
21 of that information.

22 **Q. DOES CENTURYTEL CURRENTLY HAVE A MECHANIZED PROCESS IN**
23 **PLACE TO ALLOW SOCKET TO PROVIDE SUBSCRIBER LISTINGS**
24 **INFORMATION IN THAT MANNER?**

25 A. No, CenturyTel does not have a mechanized process available for the provision of
26 subscriber listings information. Consequently, Socket's proposals throughout the DPL
27 relating to a mechanized feed are not technically feasible given CenturyTel's current
28 operating procedures and would require the development and implementation of new
29 systems.

1 **Q. HOW DOES CENTURYTEL CURRENTLY HANDLE LISTINGS DELIVERY**
2 **FROM SOCKET AND OTHER SIMILAR PROVIDERS?**

3 A. As it does for itself and others, CenturyTel handles listings delivery on a manual basis,
4 either via a one-time feed or via the DSR process per OBF standard. Where listings
5 information is provided via the DSR process, CenturyTel manually keys the data into its
6 own system for delivery to its third-party publisher. Where the one-time feed process is
7 used, CenturyTel sends the listings information directly to the third-party publisher on an
8 annual basis in order to facilitate the creation of the alphabetical section of the directory
9 and does not retain the information in its own database. This process is consistent with
10 how CenturyTel delivers its own subscriber listing information to the publisher for
11 creation of the alphabetical section of the directory.

12 **Q: HOW DOES THE DSR PROCESS OR THE ONE-TIME FEED PROCESS**
13 **AFFECT CENTURYTEL'S ABILITY TO SERVE AS THE SINGLE POINT OF**
14 **CONTACT FOR PROVISIONING OF DIRECTORY LISTINGS TO THIRD**
15 **PARTIES?**

16 A. Where the DSR process is used, CenturyTel does retain the information in its database
17 and can serve as a single point of contact for transmission of listings information to third
18 parties requesting listings. However, where a one-time feed process is used, CenturyTel
19 cannot serve as a single point of contact for delivery of listings to a publisher because
20 CenturyTel does not retain the listings information.

21 **Q. WHAT OPTIONS HAS CENTURYTEL OFFERED TO SOCKET AS**
22 **ALTERNATIVES TO THE MECHANIZED PROCESS SOCKET DESIRES?**

23 A. CenturyTel has offered Socket the option of handling listing information either via the
24 DSR process per OBF standard or, alternatively, on an annual basis via a one-time feed.
25 In addition, CenturyTel has agreed that if it ever implements a mechanized solution for

1 submission of listings information, CenturyTel will work with Socket to transition the
2 manual process to the mechanized solution.

3 **Q. HAS SOCKET PROPOSED A TIME FRAME FOR DEVELOPMENT OF A**
4 **MECHANIZED PROCESS?**

5 A. Yes. Socket's current proposal requires CenturyTel to provide Socket with instructions
6 for the mechanized feed method within thirty days of the effective date of the ICA. In
7 addition, Socket's language would require CenturyTel to use its best efforts—without
8 regard to reasonableness or cost factors—to develop the mechanized interface.

9 **Q. WHY IS SOCKET'S POSITION UNREASONABLE?**

10 A. Socket's proposal inappropriately attempts to impose AT&T Missouri-oriented
11 obligations on CenturyTel. As Dr. Avera explains in his testimony, CenturyTel is not
12 AT&T Missouri and is instead, a primarily rural ILEC serving relatively smaller
13 communities in Missouri. CenturyTel is much smaller than AT&T; operates on a
14 different size and scale; operates a substantially different network; has vastly different
15 economies of scale; and has fundamentally different operations, procedures, mechanisms,
16 and capabilities as a result of its size and scale. That Socket may have language in its
17 ICA with AT&T Missouri providing for a mechanized feed process does not mean that
18 the same obligation should be imposed on CenturyTel where the economics associated
19 with developing a mechanized feed are substantially different.

20 **Q. WHAT IS SOCKET'S POSITION REGARDING UPDATES AND CHANGES TO**
21 **SUBSCRIBER LISTING INFORMATION?**

22 A. Socket has proposed that CenturyTel handle updates and changes to subscriber listing
23 information within three business days of Socket submitting the information to
24 CenturyTel. Socket's proposed language makes no reference to any charge associated
25 with this listing management function. Alternatively, CenturyTel proposes to apply the

1 service order fee contained in the pricing appendix to Article VII for updates and changes
2 to the subscriber listing information. CenturyTel will handle these changes so long as the
3 changes are received on or before the business office close date for the directory in order
4 to have adequate time to provide a "galley proof" for Socket's review and corrections.
5 CenturyTel proposes that each additional galley proof requested by Socket will incur a
6 \$150 charge.

7 **Q. WHAT IS A GALLEY PROOF?**

8 A. A "galley proof" is an electronic file of listings extracted from a database prior to the
9 publication of a directory.

10 **Q. WHY IS SOCKET'S PROPOSED LANGUAGE UNREASONABLE?**

11 A. As a starting point, CenturyTel can only begin an update process after it actually receives
12 the data from Socket. To require CenturyTel to process the data within three business
13 days of the date when Socket sends the information (1) places CenturyTel in the position
14 where the time for processing for the requested directory might already have passed by
15 the time the data arrives at CenturyTel for processing, and (2) requires CenturyTel to
16 commit resources to process data within three business days when it is unnecessary and
17 provides no additional services to a customer. The listing information provided by
18 Socket is used for inclusion in the annual white pages. CenturyTel will commit to
19 process all updates and changes to subscriber listings information provided by Socket
20 before the business office close date for each directory. Additionally, CenturyTel should
21 not be required to serve as Socket's listing management function without appropriate
22 compensation.

23 **Q. WHAT IS CENTURYTEL'S POSITION REGARDING THE RATES**
24 **ASSOCIATED WITH UPDATING SOCKET'S LISTING INFORMATION?**

1 A. CenturyTel is proposing rates for updates and changes to Socket subscriber listings which
2 are consistent with the service order charge contained in the pricing appendix to Article
3 VII. The proposed rates are appropriate because they are designed to recover
4 CenturyTel's expense for processing a service order, which includes a DSR submitted by
5 Socket.

6 **Q. WOULD THAT PROCESS AND THE ASSOCIATED CHARGES BE**
7 **ELIMINATED IF SOCKET CHOSE TO TAKE ADVANTAGE OF THE ONE**
8 **TIME FEED OPTION PROPOSED BY CENTURYTEL?**

9 A. Yes. With the one-time feed option, Socket only provides its subscriber listings
10 information on an annual basis on or before the business office close date for a given
11 directory. Since Socket's subscriber listings information is never keyed into
12 CenturyTel's system, there is no reason to update or change the listings as a part of the
13 directory listing process. The listings Socket provides in the one-time feed represent the
14 listings to be published in the alphabetical section of the directory.

15 **Q. WHAT IS SOCKET'S POSITION REGARDING THE PROVISION OF**
16 **DIRECTORY LISTING VERIFICATION?**

17 A. Socket is proposing that CenturyTel provide electronic directory listing verification to
18 Socket on a monthly basis at no charge.

19 **Q. DOES CENTURYTEL CURRENTLY HAVE THE CAPABILITY TO PROVIDE**
20 **ELECTRONIC DIRECTORY LISTING VERIFICATION TO SOCKET ON A**
21 **MONTHLY BASIS?**

22 A. No. This issue is closely related to the mechanized feed process described above. As
23 CenturyTel does not currently have a mechanized feed process, CenturyTel is not able to
24 provide electronic directory listing verification to Socket on a monthly basis. The issue is
25 one of frequency and, given CenturyTel's current manual process, a monthly report is

1 neither practical nor feasible with CenturyTel's current systems. Although an electronic
2 copy of a report can be prepared, the process to prepare that report is manual.

3 **Q. WHAT IS SOCKET'S POSITION REGARDING THE RATE SOCKET SHOULD**
4 **PAY FOR THE MONTHLY VERIFICATION REPORT?**

5 A. Socket's position is that the monthly report should be provided at no charge.

6 **Q. WHAT FORMAT IS SOCKET PROPOSING FOR THE VERIFICATION**
7 **REPORT?**

8 A. Socket is proposing that the report be in an electronic delimited text format or an
9 equivalent format that may be electronically searched and sorted. The report that is
10 produced can be searched electronically, but because it is created manually, it is
11 infeasible to create monthly reports for individual CLECs.

12 **Q. IS CENTURYTEL ABLE TO PROVIDE THE VERIFICATION REPORT IN AN**
13 **ELECTRONIC DELIMITED TEXT OR EQUIVALENT FORMAT?**

14 A. Assuming that Socket provides the listings in the manual DSR process per OBF standard,
15 and CenturyTel has keyed those listings into its Ensemble service order system, then
16 CenturyTel is able to provide a verification report in an Excel spreadsheet format, which
17 is capable of being electronically searched and sorted. CenturyTel uses this same Excel
18 spreadsheet format to verify the accuracy of listing information for its own subscribers.
19 However, CenturyTel is not in the position to provide that report at the frequency
20 requested by Socket given the manual process associated with creating the report. The
21 process CenturyTel has proposed to Socket is consistent with CenturyTel's systems and
22 processes for its own customers. In fact, CenturyTel typically only produces a
23 verification report of its own subscriber listing information one time prior to publication.
24 Socket will be provided a verification report of its subscriber listing information at the

1 same time that a verification report is produced for verification of CenturyTel's
2 subscriber listing information.

3 **Q. IS CENTURYTEL ABLE TO PROVIDE A VERIFICATION REPORT THAT**
4 **ONLY CONTAINS SOCKET'S SUBSCRIBER INFORMATION?**

5 A. Yes, CenturyTel can provide the Excel spreadsheet in a format that only includes
6 Socket's subscriber listing information.

7 **Q. WHY IS SOCKET'S POSITION REGARDING LISTING VERIFICATION**
8 **REPORTS UNREASONABLE?**

9 A. As stated above, as a general rule CenturyTel only produces a listing verification report
10 for its own subscribers once prior to a directory publication. Socket's request for
11 monthly reporting places a significant burden on CenturyTel to manually create reports
12 on a much more frequent basis than is necessary with respect to the directory publishing
13 process. Again, CenturyTel is not AT&T Missouri and should not be obligated to
14 provide operations and procedures identical to those offered by AT&T.

15 **Q. WHAT PROCESS DOES SOCKET DEMAND TO CORRECT ERRORS**
16 **DETECTED IN THE LISTING VERIFICATION PROCESS?**

17 A. Socket demands two different processes for correcting errors which seem to conflict with
18 one another. On one hand, Socket has proposed that, to the extent it notifies CenturyTel
19 of errors or omissions in the monthly listing verification reports, CenturyTel would be
20 obligated to correct those errors and provide a new verification report within seven
21 business days. That process would continue until Socket was comfortable that all errors
22 had been resolved. In another provision, Socket has proposed that it will review a form
23 of listings verification report that Socket refers to as a "galley proof" within thirty days of
24 its receipt and notify CenturyTel of any errors or omissions.

25 **Q. HOW DOES THAT PROCESS DIFFER FROM CENTURYTEL'S PROPOSAL?**

1 A. Assuming that Socket provides its subscriber listing information to CenturyTel via the
2 DSR process per OBF standard, CenturyTel has proposed that Socket receive a one-time
3 list of its subscriber listing information prior to the publication of each directory and that
4 Socket notify CenturyTel of any errors or omissions within five business days in order to
5 allow CenturyTel sufficient time to correct the errors prior to publication. If Socket
6 chooses to provide its subscriber listing information to CenturyTel via the one-time feed,
7 presumably the subscriber listing information delivered by Socket in a one-time feed has
8 been scrubbed by Socket and is accurate prior to delivery to CenturyTel; therefore, they
9 would not require a listing verification report. However, a verification report can be
10 provided within a reasonable time upon request by Socket for a fee.

11 **Q. WHAT IS SOCKET'S PROPOSAL REGARDING THE PROVISION OF A**
12 **GALLEY PROOF?**

13 A. Socket has proposed that at least sixty calendar days prior to the business office close
14 date for a particular directory, CenturyTel would be required to provide Socket with a
15 "galley proof" in directory appearance format.

16 **Q. IS CENTURYTEL ABLE TO DELIVER A GALLEY PROOF IN DIRECTORY**
17 **APPEARANCE FORMAT SIXTY DAYS PRIOR TO THE BUSINESS OFFICE**
18 **CLOSE DATE FOR A PARTICULAR DIRECTORY?**

19 A. No. CenturyTel cannot deliver a galley proof in directory appearance format. In
20 addition, to provide a galley proof sixty days prior to business office close date would not
21 accurately reflect all of the subscriber listing information associated with that directory as
22 it would not include sixty days of service order activity.

23 **Q. WHY NOT?**

24 A. CenturyTel doesn't have the technical capability to create a directory appearance format
25 galley proof for its own subscriber listings. CenturyTel uses an unrelated third party

1 publisher who has responsibility for photocomposition of the listings information
2 associated with the publication of a directory, and CenturyTel does not receive those
3 photocomposed pages prior to publication.

4 **Q. WHY IS CENTURYTEL'S PROPOSED LANGUAGE A MORE REASONABLE**
5 **ALTERNATIVE?**

6 A. The language CenturyTel has proposed is consistent with the process CenturyTel uses to
7 confirm the accuracy of its own subscriber listings and places appropriate time frames on
8 the period for notification of errors from Socket to CenturyTel in order to ensure that the
9 subscriber information included in the alphabetical portion of the directory is the most
10 complete and accurate information.

11 **VI.**
12 **OTHER DIRECTORY ISSUES**

13 **ISSUE 5: SHOULD CENTURYTEL BE REQUIRED TO BE THE SINGLE POINT**
14 **OF CONTACT FOR PROVISIONING OF DIRECTORY LISTINGS TO THIRD**
15 **PARTIES, INCLUDING THIRD PARTY DIRECTORY PUBLISHERS?**

16 **Q. WHAT OTHER ISSUES HAVE BEEN RAISED BY SOCKET REGARDING**
17 **DIRECTORIES?**

18 A. Socket has raised the issue of arranging for secondary distribution of directories directly
19 with CenturyTel's publisher.

20 **Q. WHY IS CENTURYTEL OPPOSED TO SOCKET INCLUDING**
21 **ARRANGEMENTS FOR SECONDARY DISTRIBUTION IN THIS ICA?**

22 A. Secondary directory service is not a regulated service and, therefore, does not belong in
23 the ICA. CenturyTel is willing to negotiate, upon the approval of this ICA, an
24 arrangement to provide secondary delivery but it has no place in an ICA under the
25 auspices of the FTA.

26 **Q. WHY IS CENTURYTEL'S PROPOSED LANGUAGE MORE REASONABLE?**

1 A. Much like other non-regulated directory services, secondary distribution ought to be the
2 subject of separate negotiations between the parties and should not cloud the issues
3 appropriately handled through the ICA.

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes, it does.