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GTE FLORIDA INCORPORATED
REBUTTAL TESTIMONY OF ALLAN PETERS
DOCKET NO. 960847-TP

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Allan Peters and my business address is 600 Hidden Ridge, Irving, Texas 75038.

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

A. I am employed by GTE Telephone Operations ("GTE") as Group Product Manager-Directory Services. I am responsible for all directory-related matters within GTE Telephone Operations, including the establishment of terms and conditions under which GTE Telephone Operations provides directory services to third parties, including competitive local exchange carriers.

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATION AND WORK EXPERIENCE.

A. I have an Associates Degree in Business Administration from Longview Community College in Lee's Summit, Missouri. I have 25 years' experience in the directory publishing industry, having been employed by L. M. Berry & Company, Mast Advertising and Publishing, United Telephone/Sprint, and Contel Service Corporation before joining GTE in April, 1991. My initial position with GTE was as

1 a Staff Administrator-Directory Services, and I was named to my
2 current position in June, 1993.

3

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A. I will respond to the positions of AT&T and MCI on directory matters.
6 In doing so, I will describe GTE's proposed handling of directory
7 publishing and distribution in association with interconnecting
8 Alternative Local Exchange Carriers ("ALECs").

9

10 **Q. WILL GTE DISTRIBUTE DIRECTORIES TO ALEC'S END USER**
11 **CUSTOMERS AS WELL AS GTE'S END USERS?**

12 A. Yes. GTEFL is willing to provide the initial distribution of the
13 telephone directory—including both GTEFL and ALEC end users—at
14 no charge to ALEC customers within GTE's traditional directory
15 service area. Secondary distribution of directories (outside the
16 annual delivery (e.g., to new customers, request for additional copies)
17 will be offered to the ALEC at a reasonable rate. The ALEC will be
18 required to supply GTEFL with all required subscriber mailing
19 information to enable GTEFL to perform its distribution
20 responsibilities. This will also include information on nonpublished
21 and nonlisted customers.

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1 **Q. AT&T WITNESS CARROLL COMPLAINS THAT WHILE GTEFL**
2 **DOES NOT CHARGE ITS RETAIL CUSTOMERS FOR**
3 **SECONDARY DELIVERY, IT HAS PROPOSED TO CHARGE AT&T**
4 **FOR THE SAME SERVICE. IS THIS PROPOSED CHARGE**
5 **UNFAIR?**

6 **A. Absolutely not. The \$2.49 secondary distribution charge proposed by**
7 **GTEFL is precisely the same charge that GTEFL pays for secondary**
8 **distribution. The fact that GTEFL does not directly impose this**
9 **charge on its end users is immaterial to whether GTEFL should have**
10 **the right to collect this charge from AT&T and MCI. As Mr. Carroll**
11 **admits, the charge for secondary delivery is presumably included in**
12 **the price for local service. By the same token, AT&T can handle the**
13 **charge in the way that it believes is best from a marketing standpoint.**
14 **But waiving the secondary distribution charge for AT&T or MCI—and**
15 **thus forcing GTEFL to pick it up—would give AT&T and MCI an**
16 **unambiguous and unwarranted advantage over other ALECs and**
17 **GTEFL itself. Competition would certainly not benefit through this**
18 **approach, contrary to Mr. Carroll's claims.**

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20 **Q. IN ITS PETITION (AT PAGE 11), AT&T DEMANDS THAT GTEFL**
21 **PROVIDE AT&T WITH SPACE IN THE GTEFL DIRECTORY THAT**
22 **IS EQUAL TO THE SPACE GTEFL PROVIDES ITSELF. IS THIS**
23 **POSITION REASONABLE?**

24 **A. No. GTEFL has the right to control the content of its publications.**
25 **GTEFL does not believe the information pages of its directories are**

1 the proper place for ALECs to discuss their products and services, as
2 AT&T wishes to do. Moreover, in a competitive market, each new
3 page on products and services that one ALEC includes may be
4 replicated by every other ALEC. (I understand from my lawyers that
5 whatever the Commission orders for AT&T, GTEFL may have to make
6 available to all other ALECs as a result of the FCC's recent
7 interconnection order.) Such a result—even if only a few ALECs took
8 advantage of it—would make GTEFL's directories unwieldy for
9 customers to use.

10

11 **Q. HAS GTEFL OFFERED ANY SPACE IN ITS DIRECTORIES TO**
12 **AT&T AND MCI?**

13 **A. Yes. GTE is willing to provide limited space in the Information Pages**
14 **of its directories at no charge for critical customer contact information**
15 **(i.e., business office, billing inquiries, repair) only. No product**
16 **information will be allowed in the information pages, and no ALEC**
17 **logos will be placed on directory covers (as MCI has asked in its**
18 **Petition at 44). GTEFL believes this proposal is fair and in keeping**
19 **with the concerns I discussed above.**

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

22 **A. Yes, it does.**

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