ORIGINAL

Decision No. 90207 APR 24 1979

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Investigation on the Commission's own motion into the telephone directory advertising rates, charges, contracts, rules, practices, and service of GENERAL TELEPHONE COMPANY OF CALIFORNIA.

CII No. 37 (Filed February 27, 1979)

Richard E. Potter, Attorney at Law, for General
Telephone Company of California, respondent.
Sigelman & Stein, by Rick M. Stein, Attorney at
Law, for Clarke Directory Publications, Inc.;
Jack Krinsky, for Ad Visor, Inc. (on behalf of
Orange Coast Moving & Storage, J. H. Biggar
Fine Furniture, and Meade's Air Comfort Air
Conditioning); and James A. Varon, Attorney
at Law, for General Telephone Directory Company;
interested parties.
Elinore C. Morgan, Attorney at Law, for the Commission
staff.

INTERIM OPINION

Attached as Appendix A is Advice Letter No. 4336 of General Telephone Company of California (General). That Advice Letter was filed November 20, 1978, and became effective on December 21, 1978, pursuant to Section III.H of General Order No. 96-A. That filing indicates that the Advice Letter was mailed to all parties of record in Cases Nos. 10327 and 10346.

General Order No. 96-A (Section III.H) provides that in the absence of timely protest (20 days prior to the effective date of the proposed tariff change), tariff filings not involving an increase in rates automatically are effective 30 days after filing.

By letter dated February 16, 1979, Rick Stein, attorney for Clarke Directory Publications, Inc. (Clarke), a party of record in Cases Nos. 10327 and 10346, requested suspension of Advice Letter No. 4336 on the basis that he had not been advised of the filing of the Advice Letter within the period in which a timely protest could be filed.

Subsequent to the effective date of the tariff filings made pursuant to Advice Letter No. 4336, the Commission received more than 425 letters of protest.

As a result of the foregoing, the Commission issued OII No. 37 on February 27, 1979. OII No. 37 ordered the institution of an investigation on the Commission's own motion into the telephone directory advertising rates, charges, contracts, rules, practices, and service of General for the purpose of determining whether the tariff filed pursuant to Advice Letter No. 4336 should be suspended and whether the Commission should prohibit the publication of the new neighborhood telephone directories covered by said Advice Letter. OII No. 37 further ordered that respondent General shall not publish the directories before May 1979 in accordance with said Advice Letter and shall have the burden of proving that copies of its Advice Letter No. 4336 were mailed on or about November 16, 1978 so that timely protests could be received by the Commission, and respondent General shall have the further burden of proving why said tariff should not be suspended and why publication of new neighborhood directories covered by Advice Letter No. 4336 should not be prohibited.

Public hearing in OII No. 37 was held before Administrative Law Judge Mallory in Los Angeles on March 19, 20, and 21, 1979. The matter was submitted subject to the filing of concurrent briefs due April 4, 1979.

Evidence was received from four witnesses appearing for General; Clarke; Ad Visor, Inc.; the Chambers of Commerce of San Dimas, Walnut, Pomona, La Verne, and Claremont. Eighteen individuals testified in opposition to the Advice Letter.

Background

General provides telephone service in the San Gabriel Valley. In that area it publishes two main directories, the so-called Pomona area directory and the Ontario area directory. The alphabetical listing of telephone service subscribers (white pages) is the same in both the Pomona and Ontario area directories. The classified sections (yellow pages) in each directory cover only the communities described in Footnote 2. The geographical areas covered in the two directories are adjacent; the Pomona area lies to the West,

Guasti, Mt. Baldy, Chtario, Rancho Cucamonga, Upland, and portions of Chino, Claremont, Corona, Fontana, La Verne, Montclair, Pomona, San Dimas, and Walnut.

The Pomona Directory includes Chino, Claremont, Diamond Bar, La Verne, Montclair, Pomona, San Dimas, Walnut, and portions of Cucamonga, Glendora, Industry, La Puente, Mt. Baldy, Ontario, Rancho Cucamonga, Rowland Heights, Upland, and West Covina.

The Ontario Directory includes Alta Loma, Cucamonga, Etiwanda,

and the Ontario area lies to the East. Montclair is the approximate center of the geographical area covered by the two directories. The main shopping center for the two areas as pin-pointed on the maps appearing on the back cover of each directory is the Montclair Shopping Center located at 5003 S. Plaza Lane. That shopping center lies adjacent to and just west of the line dividing the geographical areas served by the two directories.

Advice Letter No. 4336 authorized General to publish four so-called neighborhood directories within the area covered by the current Pomona Directory. The total stations in service excluding company administrative stations for each area as of October 31, 1978, are as follows:

TABLE 1

Neighborhood Directory	Total Stations	Rate <u>Group</u>
Pomona	47,287	17 (40,001 - 47,500)
Walnut-Diamond Bar	37,604	16 (35,001 - 40,000)
Chino	32,122	15 (30,001 - 35,000)
Claremont-La Verne-San Dimas	79,859	21 (75,001 - 87,500)

General will continue to publish the Fomona and Chtario Directories. Subscribers within each area covered by a neighborhood directory will receive the neighborhood directory applicable to his or her area as well as the Pomona Directory.

The telephone directories furnished to its subscribers by General are published by an affiliate, General Telephone Directory Company (GTDC). GTDC also arranges for and sells the yellow page advertising in directories published by it. In recent months GTDC has contacted advertisers in the Pomona Directory yellow pages concerning renewal of advertising in the next issue of that directory. In connection with those sales activities, GTDC has offered and sold yellow page space in the new neighborhood directories.

Separate schedules of charges are applicable to the Pomona and to the neighborhood directories, based on the number of subscribers to be furnished with each directory.

The net revenues from the publication of existing directories of General are split 43 percent to GTDC and 57 percent to General under agreement reached several years ago.

Advice Letter No. 4336 was accepted for filing by our Communications Division on the belief that Commission policy concerning publication of new neighborhood directories was determined in Western Directory Publishers Assn. v General Telephone Co. of Calif. (Decision No. 88552 dated March 7, 1978 in Cases Nos. 10327 and 10346). The principal issue raised in that proceeding was whether the publication of neighborhood directories within the area of General's Covina Exchange constituted unfair and unlawful competition because Clarke published private directories in the same area. The Commission found General's actions did not constitute unfair or unlawful competition with Clarke. It also found that such offering beneficially provided more options to advertisers, resulting in a greater convenience for the telephone user, and that any added revenues would be a contribution to overall costs of providing telephone service. Public participation in Cases Nos. 10327 and 10346 was minimal; the only real apposition to the publication of neighborhood directories in the Covina Exchange was from Clarko. That proceeding was devoid of the type of evidence adduced by public witnesses in this proceeding.

Our interim decision herein is based on the record made to date, which consists primarily of the effect upon advertisers of the publication of the proposed neighborhood directories. The fact that we initially reach a different conclusion herein than was reached in Decision No. 88552 is because the record in the two proceedings is different; it does not necessarily reflect a new or different philosophical approach to approval of neighborhood directories.

Because of the time constraints resulting from the proposed publication dates of the new directories in the Pomona Exchange, we must promptly decide whether to halt publication of those directories, without resolving other issues raised herein.

Evidence Concerning Service of Advice Letter on Clarke

OII No. 37 ordered that General shall have the burden of proving that copies of its Advice Letter No. 4336 were mailed on or about November 16, 1978 so that timely protests could be received by the Commission.

General presented evidence through Mrs. Betty Brown, an administrative clerk in General's Revenue Requirements Department. The testimony of this witness was to the effect that it was her joo to prepare the mailing of advice letter filings to the Commission and to interested parties. To the best of her recollection the Advice Letter was mailed on November 16 or 17, 1978 to persons on a regular notification list and to appearances in Cases Nos. 10327 and 10346. When the question arose concerning the mailing, she found in her file on Advice Letter No. 4336 two notification lists, one of which bore the name of Rick Stein, attorney for Clarke in Case No. 10327. She was not certain when the latter list was placed in the file. An amendment was mailed on or about December 14, 1978. The mailing list which included Stein's name could have been placed in her file on that date.

Stein testified that he received a copy of Advice Letter No. 4336, together with the amendment thereto, on December 18, 1978. Upon receipt of the Advice Letter and amendment, Stein advised Clarke of the filing. 3/

The evidence on the issue of service of the Advice Letter upon Stein is contradictory. However, the hearing officer inferred from the testimony and demeanor of the witnesses that Stein was not served with the Advice Letter at the time of the original mailing, and that service of the Advice Letter on Stein was accomplished at the same time as service of the amendment. Evidence of General

OII No. 37 also ordered that General shall have the burden of proving why the tariff provisions resulting from Advice Letter No. 4336 should not be suspended and why publication of new neighborhood directories in the Pomona Exchange should not be prohibited. In response to this directive, General presented three witnesses.

Clarke, in turn, prepared a flyer (Exhibit 11) which was sent to all yellow page advertisers in the Pomona Directory advising them of the plan to publish the neighborhood directories, and Clarke's views as to the impact of such publication on the advertisers. The flyer apparently caused the influx of protest letters.

Barbara Kelly, division manager of GTDC testified with respect to GTDC's part in the proposed publication of the new neighborhood directories. GTDC is under contract with General to sell, compile, and publish General's directories. The Pomona Valley is under Ms. Kelly's jurisdiction as general manager. Ms. Kelly believes that two benefits result from publication of neighborhood directories. A smaller directory is more convenient to the user as it makes it easier to find local listings as the local book is less bulky than the wide-area directory. Secondly, the neighborhood directory offers an option to advertisers in that it permits a small advertiser to pinpoint his advertising at a lower cost than publication in a wide-area directory. GTDC's policy is to lock for smaller geographical areas within a larger area served by one or more wide-area directories. The smaller areas should have local identity and localized shopping patterns. The smaller areas should be economically suited in that they should have adequate average income and property values. GTDC assertedly also studies the ratio of businesses to residences and the types of businesses within the smaller areas.

The only study made by GTDC with respect to the above factors is Exhibit 12, summarized in the following table:

TABLE 2
Pomona Neighborhood Study

Directory	Dir. No.	Total Telephones	% Total Tel. To Metro Total	Estimate Current # Advertisers
Foothill San Dimas La Verne Claremont	(CO 559) (CO 557) (CO 556)	16,108) 21,037) 41,057) 78,202	38.6	1,596
Pomona-N	(CO 558)	47,507	23.5	1,314
Walnut-D.Bar	(00 560)	36,202	17-9	514
Chino Chino Los Serranos	(CO 555) (CO 561)	32,080) 8,393) 40,473	20-0	783
Pomona Metro		202,384	100.0	4,210

No study was prepared by GTDC with respect to other factors, such as local identity and local shopping patterns, income or property values, or the types of businesses within the areas of each neighborhood directory. These matters were assertedly discussed with several of the yellow page advertising salesmen employed by GTDC and, in their view, such criteria would be met. No study was made of the acceptance of the new neighborhood directories by current subscribers or advertisers in the Pomona Directory.

Ms. Kelly testified that sale of advertising in the new directories was completed in February, and that the directories are being readied for printing by the Los Angeles Times-Mirror Publishing Company. Preliminary figures show annual revenues for the San Dimas-La Verne-Claremont Directory of about \$99,000, for the Walnut-Diamond Bar Directory of about \$62,000, for the Chino Directory of about \$74,000, and for the Pomona Directory of about \$48,000.

James Varon, legal counsel for GTDC, testified that on or about April 10 galleys for the new neighborhood directories will be sent to the publishing company, final paging will be submitted to the publishing company on or about April 23, and the printing of the new directories will be completed by the first part of May.

Michael Baker, business office administrator for General, presented Exhibit 13, which delineates the area covered by the current Pomona Directory and the sub areas of each new neighborhood directory. That exhibit also contains markings which purport to show the locations of business. Such data were obtained by Baker by driving through the area and marking observed locations on a map. The business location information shown in Exhibit 13 was obtained only a few days before the hearing and had no bearing on General's decision to publish the new neighborhood directories.

Baker testified that the only supporting study made by General was a calling pattern analysis. The study showed the number of telephone calls that originate and terminate within a given central office serving area. The results are as follows:

San Dimas-La Verne-Claremont	49%
Walnut-Diamond Bar	35%
Chino	46%
Pomona	43%

According to the witness, the above data show the local community of interest. The witness indicated that the four criteria used by General for determining whether to publish neighborhood directories are:

- Community of interest, as indicated in local calling patterns.
- 2. The number of business and residential stations within a given sub area.
- 3. The geographical outline of the neighborhood directory, as determined in part by the areas covered by local central offices within a given wide-area directory.

4. The recommendation of GTDC.

Baker testified that General relied principally upon the recommendation of GTDC as to whether to publish the new neighborhood directories. General made no opinion or other type of survey which would indicate acceptance or rejection by advertisers of the neighborhood directories.

Evidence of Present Directory Advertisers

Testimony was presented on behalf of 21 business entities that now advertise in the Pomona wide-area directory. All such persons opposed the publication of neighborhood directories. $\frac{4}{2}$

The objections to neighborhood directories were based on several factors, which may be described as follows: There will be a need to advertise in four neighborhood directories and in the Pomona Directory in order to reach the same potential customers as are reached with the present Pomona wide-area directory. Several witnesses indicated that the potential customers they attempt to reach through directory advertising are located in areas covered by more than one neighborhood directory, or by all neighborhood directories. Inasmuch as each subscriber will receive a Pomona wide-area directory and a neighborhood directory for his locality, advertisers cannot be certain which directory will be used by the subscriber for yellow page reference. This fact assertedly requires a business concern to advertise in the neighborhood book for each area in which potential customers are located, and also in the wide-area directory. Most witnesses have placed advertisements in the Pomona

The following types of businesses were represented: boat-rental company, insurance agency, wastepaper brokerage, fireplace and patio goods, plumbing, travel service, pharmacy, carpet cleaner, dairy, real estate broker, printing company, church, dentist, bicycle supplies, floor covering, children's day school, moving and storage company, furniture store, air conditioning store, and bridal shop.

wide-area directory and in one or more neighborhood directories. They point out that publication of their advertising in this manner reaches no more customers than are now reached by publication in the Pomona wide-area directory. The only effect is to increase their yellow page advertising costs. Some advertise under more than one heading; in such cases advertising under some headings would be dropped in order to advertise in more than one directory.

A majority of the witnesses believe that yellow page advertising is the most effective or only means of reaching potential customers. For example, dentists find that yellow page advertising is a practical means of meeting standards set by their professional society. Small businesses, such as the bridal shop, carpet cleaner, and travel agency spend a preponderance of their advertising budget for yellow page advertising. The additional cost of duplicative yellow page advertising assertedly reduces their profit margins without increasing the potential customers reached by that advertising.

The consensus of the testimony of these witnesses was the purpose of the additional neighborhood directories is to increase General's and GTDC's yellow page advertising revenues, without offering commensurate benefits to either yellow page advertisers or telephone subscribers. The witnesses indicated that no market survey was conducted within the Pomona Directory area to determine their advertising needs or acceptance of the new neighborhood directories.

Some of the witnesses now advertise in neighborhood directories within the Covina Exchange area. According to the witnesses the small number of listings in both the white and yellow pages contained in those neighborhood directories and the small area which they cover make them less convenient for a subscriber to use than the related wide-area directory. They believe that little additional utility is created by the issuance of neighborhood directories; on the other hand, the duplicative directories use up natural resources in limited supply, such as newsprint paper.

Chambers of Commerce

Representatives of the Chambers of Commerce of San Dimas, Claremont, Walnut Valley, Pomona, and La Verne testified in opposition to the publication of neighborhood directories in the Pomona Directory area. The decision to oppose such publication was reached by vote of the general membership or the board of directors of each chamber. The chambers each have in excess of 100 members. The reasons for opposing neighborhood directories are generally the same as those described above.

Discussion

It is unusual to find such universal public opposition as was evidenced herein. No entity other than General and GTDC supported the publication of neighborhood directories.

The evidence of protestants clearly indicates that advertisers would receive no material benefits from the issuance of the new directories. On the other hand, the evidence indicates that many yellow page advertisers would incur substantially increased costs of advertising without increasing the number of customers reached by such advertising. None of the protestants indicated that publication of their advertising in a single neighborhood directory would satisfy their needs, as indicated by General.

The limited evidence with respect to acceptance of neighborhood directories by subscribers was adduced by protestants who also are advertisers.

In making its determination whether to publish four neighborhood directories within the area now covered by its Pomona Directory, General relied primarily on the recommendation of GTDC. GTDC, in turn, relied on statistical data concerning the numbers of subscribers and advertisers within each area as shown in Table 2, and upon oral communications with area representatives as to locations of businesses and their potential customers. No surveys were made to determine the acceptance of the new directories by subscribers or by advertisers.

It is not difficult to assume, as have the protestants, that the primary motive of General and GTDC was to increase advertising revenues, as the views of subscribers and advertisers were not solicited. When advertisers were made aware of General's plan to publish the new directories, more than 425 written protests were received.

General has not borne the burden of proving that the tariff should not be suspended. We will suspend the publication of the neighborhood directories covered by Advice Letter No. 4336 until further order of the Commission. The order which follows will direct General to prepare and furnish data that indicate whether or not the publication of neighborhood directories will benefit subscribers, and the acceptance level of the proposed neighborhood directories by subscribers to its Pomona wide-area directory; inasmuch as we believe such deficiencies in the record should be cured before a final decision is reached herein. We will determine at a later date when this proceeding should be recalendared and whether it should be consolidated with a general investigation proceeding.

Findings

- 1. The tariff filings appended to Advice Letter No. 4336 filed by General on November 20, 1978 and amended December 18, 1978 became effective December 21, 1978 in the absence of protest pursuant to General Order No. 96-A (Appendix A).
- 2. Advice Letter No. 4336 provided for the publication of four neighborhood telephone directories within the same geographical area now covered by General's Pomona wide-area directory.
- 3. Advice Letter No. 4336 states that it was served on parties of record in Cases Nos. 10327 and 10346. Rick Stein, attorney for Clarke, is a party of record in those proceedings.
- 4. Service of Advice Letter No. 4336 upon Rick Stein was accomplished simultaneously with service of the amendment dated December 14, 1978. Such service prevented Rick Stein (or Clarke) from making a timely protest of the Advice Letter under provisions of General Order No. 96-A.
- 5. Upon being informed that Advice Letter No. 4336 may not have been properly served, and upon receipt of more than 425 written protests, the Commission issued OII No. 37.

- 6. OII No. 37 placed the burden of proof upon General to show why the tariff pages appended to Advice Letter No. 4336 should not be suspended and why publication of new neighborhood directories covered by Advice Letter No. 4336 should not be prohibited.
- 7. A duly noticed public hearing was held in OII No. 37 in which General and all interested parties had opportunity to appear and be heard.
- 8. The evidence presented by General showed that the four considerations underlying its decision to publish neighborhood directories in the Pomona Exchange were:
 - (a) Community of interest, as evidenced in analysis of local calling patterns.
 - (b) The geographical outline of potential neighborhood directories, as determined in part by the areas covered by local central offices and, in part, by configurations recommended by GTDC.
 - (c) The number of business and residential stations within a given area, as well as the number of current yellow page advertisers in such area.
 - (d) The recommendation of GTDC that such neighborhood directories should be published.
- 9. The principal factor relied upon by General was GTDC's recommendation.
- 10. GTDC publishes telephone directories for General and arranges for the sale of yellow page advertising in such directories.
- ll. The principal factors relied upon by GTDC in making its recommendation to General were the Pomona Neighborhood Study set forth in Table 2 and the oral comments of its sales representatives as to business locations and calling patterns within the Pomona Exchange area.

- 12. No studies were conducted by General or GTDC of the needs or desires of telephone subscribers or yellow page advertisers with respect to publication of the neighborhood directories covered by Advice Letter No. 4336, nor was any study made of the acceptability of such publications by present or potential yellow page advertisers.
 - 13. The Pomona wide-area directory will continue to be published after publication of the four neighborhood directories is initiated. Each subscriber to telephone service in the Pomona Exchange area will receive a Pomona wide-area directory together with the neighborhood directory for the local area in which the subscriber is situated.
 - 14. The sale of yellow page advertising for the revised Pomona Directory and the four new neighborhood directories has been completed. Preliminary data show the following estimated annual advertising revenues for the neighborhood directories:

San Dimas-La Verne-Claremont	\$ 99,000
Walnut-Diamond Bar	62,000
Chino	74,000
Pomona	48,000
Total	\$283,000

- 15. The protestants in this proceeding are current yellow page advertisers and local chambers of commerce. The chambers represent substantial numbers of local business people.
- 16. Protestant's evidence indicates that, contrary to General's contention, they will advertise in both the wide-area directory and one or more neighborhood directories in order to ensure that they will maintain the same exposure as they now achieve with the current wide-area directory.
- 17. The effect upon protestants of maintaining their advertising in the wide-area directory and adding advertising in one or more neighborhood directories is to substantially increase yellow page advertising costs without increasing the geographical or numerical coverage of such advertising.

- 18. The limited evidence received concerning acceptability of neighborhood directories by subscribers indicates that the neighborhood directories cover such a limited area and contain so few white and yellow page listings that the neighborhood directories afford limited utility to subscribers.
- 19. The evidence of General, GTDC, and protestants, when taken as a whole, indicates that no real benefits redound to telephone subscribers or yellow page advertisers from publication of the neighborhood directories covered by Advice Letter No. 4336, but that General's and GTDC's advertising revenues will be substantially increased.
- 20. General has not sustained the burden of proof ordered in OII No. 37.
- 21. General's proposals in Advice Letter No. 4336 are not just and reasonable and are not consistent with the public interest.

 Conclusions
- 1. Adequate notice was not furnished to interested parties (in particular Rick Stein, attorney for Clarke) in which timely protest could be made to Advice Letter No. 4336.
- 2. An investigation on the Commission's own motion is a proper procedure when timely protest to an advice letter filing is prevented by inadequate notice of such filing.
- 3. General's classified (yellow page) and informational (white page) portions of telephone directories are essential instrumentalities in connection with its telephone service, and are subject to regulation by the Commission (Decision No. 88552, supra).

- 4. Since General's proposal to publish four neighborhood directories in its Pomona Exchange has been found to be not just and reasonable and not consistent with the public interest, the tariff filings appended to Advice Letter No. 4336, as amended, should be suspended until further order of this Commission.
- 5. Inasmuch as the printing and publication of the four neighborhood directories are scheduled to commence in mid-April and distribution is scheduled in early May 1979, this order should become effective on the date of issuance.

INTERIM ORDER

IT IS ORDERED that:

1. The tariff pages shown below filed by General Telephone Company of California in connection with its Advice Letter No. 4336 are suspended until further order of the Commission:

Schedule Cal. P.U.C. No. D-1 156th Revised Page Check Sheet A 4th Revised Sheet 9.2

- 2. General Telephone Company of California is directed to prepare studies or analyses showing: (1) the benefits which will be derived by current telephone subscribers from the publication of the neighborhood directories proposed in Advice Letter No. 4336, and (2) the level of acceptance of such neighborhood directories by: (a) current subscribers to General's Pomona Directory, and (b) subscribers to the neighborhood directories published pursuant to the authority granted in Decision No. 88552. Copies of such studies shall be served upon parties to this proceeding within 180 days after the effective date of this order.
- 3. Further action in this proceeding shall be taken as the Commission may order.
- 4. The motion of Clarke Directory Publications, Inc. to admit the 457 protest letters in evidence in CII No. 37 is denied. The effective date of this order is the date hereof.

Dated at ______, California, this 24th day of APRIL -, 1979.

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Commissioners

APPENDIX A Page 1 of 2

GENERAL TELEPHONE COMPANY OF CALIFORNIA

An Equal Opportunity Employer

100 WILSHIRE BOULEVARD - P.O. BOX 889 - SANTA MONICA, CALIFORNIA 90406 - 213 393-9311 - DATATEL 213 395-1960 EXECUTIVE OFFICES

November 16, 1978

408-72

CONFERENCE.

20 FECTIVA -DEC 21 1978

RESOLUTION-

IN REPLY REFER TO

3400/3430 R2.1H1

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(8872) /

Advice No. 4336 ,

Public Utilities Commission of the State of California

CO

Someral Telephone Company of California hereby transmits for filing the following changes in its tariff schedules: following changes in its tariff schedules:

> Schedule Cal. P.U.C. No. D-1 (Telephone Directory Services)

156th Revised Check Sheet 4th Revised Sheet

This filing will provide for the establishment of a new neighborhood directory service in Pomona, encompassing the Chino, Claremont - La Verne - Sam Dimas and Walnut Central Office boundaries. The growing community of Diamond Bar served by the Walnut Central Office is included in the city designation for better identification by the served communities.

The format will be identical to existing larger exchange directories, duplicating the regular type alphabetical and classified listing within the designated area.

Studies of local point-to-point call volumes were taken to determine customer calling patterns. Analysis revealed that the majority of local calls were completed within existing central office boundary areas or within combined central office boundaries.

The total stations in service within each directory boundary area established the applicable rate group based on existing rate group bands. Classified advertising service will be available at the authorized rates commensurate with the appropriate rate group.

The schedule publication date for May, 1979.

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PUBLIC UTILITIES COMMISSION STATE OF CALIFORNIA

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The total stations in service excluding company administrative stations for each area as of October 31, 1978, are as follows:

Neighborhood Directory	Total Stations	Rate Group
Pomona	47,287	£ 17 (40,001 - 47,500)
Walnut - Diamond Bar	37,604	26 (35,001 - 40,000)
Chino	32,122	16 (35,001 - 40,000) 15 10 (30,001 - 35,000)
Claremont - La Verne - San Dimas	79,859	21 (75,001 - 87,500)

This filing will not increase any rate or charge, cause the withdrawal of service, nor conflict with other schedules or rules.

It is respectfully requested that this filing become effective on regular statutory notice.

Copies of this Advice have been mailed to those interested utilities and/or parties indicated in our letter to the Public Utilities Commission dated August 21, 1973 and also to all parties of record in Cases No. 10327 and No. 10346.

Very truly yours

GENERAL TELEPHONE COMPANY OF CALIFORNIA

Brehard L. Ollen

RICHARD L. OHLSON

Vice President

Attachments