

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Comply with the	:	
Competitive Classification of	:	
Telecommunication Retail Services Under	:	
66 Pa. C.S § 3016(a); General Review of	:	Docket No. L-2018-3001391
Regulations 52 Pa. Code, Chapter 63 and	:	
Chapter 64	:	
	:	
	:	
	:	

REPLY COMMENTS OF THRYV, INC.

Pursuant the Commission’s Notice of Proposed Rulemaking Order¹ in this docket, Thryv, Inc.² submits these reply comments, focused solely on two regulations relating to the publication or distribution of telephone directories, specifically 52 Pa. Code § 63.21 (directories) and certain subsections of § 64.191 (public information).

As the Commission recognized in its Rulemaking Order, it originally intended to address not just those regulations relating to Verizon’s competitive reclassification, “but also those that, in effect, had become less vital given the evolution of the provision of telecommunications today,” recognizing that “any review or revision must take into consideration the emergence of new industry participants, technological advancements, service standards and consumer

¹ 51 Pa.B. 1999 (April 10, 2021) (“Rulemaking Order”).

² f/k/a “Dex Media, Inc.” (hereinafter “Thryv”).

demand.”³ It thus initiated this rulemaking to respond to changes in the competitive market by determining whether “the presence of viable competitive alternatives warrant the elimination of certain regulations applicable to jurisdictional telecommunications carriers in both competitive and noncompetitive areas.”

Of course, Thryv is not a jurisdictional telecommunications carrier, but because of very real cost considerations, it is vitally affected by the Commission’s regulations when it provides the directory functions needed by CenturyLink and Verizon in Pennsylvania.

This Commission has previously streamlined and relaxed regulations relating to directories, which has been helpful improving the efficiency of publication and distribution of print directories.⁴ At this time, rather than merely codifying those previous waivers as it proposes to do in this final rulemaking (long in the making and unlikely to be soon revisited), the time has come for the Commission to definitively rescind directory requirements made obsolete by new technology and ongoing shifts in consumer choices and behavior. Several years of experience with the previous relaxation of regulations establishes that the market is working to target print directories to consumers who are likely to use them.

Thryv emphasizes that complete or partial rescission of 52 Pa. Code §§ 63.21 & 64.191 will not eliminate the provision or availability of printed directories to those who need and want them. As the largest directory publisher in the nation, Thryv’s business is to provide those directories as efficiently and effectively and as long as possible. It therefore requests only the

³ Rulemaking Order, 51 Pa.B. at 1999 (citing 66 Pa.C.S. § 3019(b)(2)).

⁴ See, e.g., *Joint Petition and Notice of The United Telephone Company of Pennsylvania LLC d/b/a CenturyLink, Verizon Pennsylvania LLC and Verizon North LLC and Dex Media, Inc. to Reduce Distribution of Print Telephone Directories and Transition to Digital Publication or, Alternatively, for Relief of 52 Pa. Code § 64.191(g)*, Docket No. P-2017-2610359 (Order entered August 31, 2017) (hereinafter “Directory Waiver”).

elimination of those requirements whose benefits are protected by tariff provisions or other regulations in Chapters 63 and 64,⁵ or are provided adequately by the marketplace.

In its initial comments, Thryv provided updated data and experiences showing that the traditional print directory market is now small enough, and competitive options ubiquitous enough, that no further regulation of any sort is in the public interest. The initial comments of Verizon supplied compelling reasons in support of this unavoidable fact. The Office of Consumer Advocate recommended rescission of subsection 64.191(f)(4) (referencing the telephone directory as a resource for “a more thorough explanation and price list of services”) because it is no longer relevant given the movement away from saturation delivery of white pages directories.⁶

Thryv again encourages the Commission to take the next logical step in the evolution of the regulatory environment – full deregulation – so as to preserve and prolong print directories for those who use them.

Respectfully submitted this 24th day of June, 2021.

⁵ For example, by 52 Pa. Code §§ 63.15 (relating to complaint procedures) and 64.131-.163 (relating to disputes; informal and formal complaints).

⁶ OCA Initial Comments at p. 38.

James H Cawley

Brooks E. Harlow
Technology & Communications Law, PLLC
8220 Crestwood Heights Dr., Suite 1705
Tysons, Virginia 22102
Direct: +1 703-854-1997
Mobile: +1 206-650-8206
Email: BHarlow@TechComm.law
URL: www.techcomm.law
Attorneys for Thryv, Inc.

James H. Cawley
SkarlatosZonarich LLC
320 Market Street, Suite 600W
Harrisburg, PA 17101
Tel: 717-233-1000
Fax: 717-233-6740
E-Mail: jcawley@skarlatoszonarich.com
Of Counsel

June 24, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

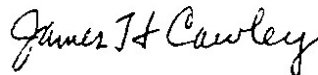
**Re: Rulemaking to Comply with the Competitive Classification of
Telecommunication Retail Services Under 66 Pa. C.S. § 3016(a);
General Review of Regulations 52 Pa. Code, Chapter 63 and
Chapter 64 - Docket No. L-2018-3001391**

Dear Secretary Chiavetta:

Enclosed please find Thryv, Inc.'s Reply Comments regarding the Commission's Notice of Proposed Rulemaking in the above-captioned matter.

Please contact me if you have any questions.

Sincerely yours,



James H. Cawley

cc: David Screven, Deputy Chief Counsel, Law Bureau (dscreven@pa.gov)
Attached Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Thryv, Inc.'s Reply Comments upon the individuals listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

Barrett Sheridan, Esq.
bsheridan@paoca.org

Charles E. Thomas III, Esq.
cet3@tntlawfirm.com

Steven J. Samara
steve.samara@patel.org

Pamela C. Polacek, Esq.
ppolacek@ctenterprises.org

Suzan DeBusk Paiva, Esq.
Suzan.d.paiva@verizon.com

Elizabeth R. Marx, Esq.
emarxpulp@palegalaid.net

Scott Rubin, Esq.
scott.j.rubin@gmail.com



James H. Cawley
SkarlatosZonarich LLC
320 Market Street, Suite 600W
Harrisburg, PA 17101
Tel: 717-233-1000
Fax: 717-233-6740
E-Mail: jcawley@skarlatoszonarich.com

Dated: June 24, 2021