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Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
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Re: CR 101, UT-120451 (submitted by e-mail)
White Pages Directories

These comments are submitted in support of eliminating the requirement that telephone books be delivered to each customer, as currently provided in WAC 480-120-251.

Not all customers need printed directories. Many people prefer to use the internet to find telephone numbers, and do not want to receive printed phone books. People should have the choice to receive printed phone books. The UTC should not require telephone companies to deliver phone books to every customer.

Telephone companies should give their customers the choice to receive a phone book, through an affirmative "opt in" system. Telephone companies should be required to deliver a printed phone book to customers who request a printed phone book.

This change could be accomplished through a simple one sentence amendment as follows:

WAC 480-120-251(3) A LEC must provide each customer a copy of the directory for the customer's local exchange area. A LEC must provide each customer with a postcard notice that automatic delivery will be terminated, along with instructions to opt in to ongoing free delivery of a copy of the directory for the customer's local exchange area. If the directory provided for in subsection (1) of this section does not include the published listing of all exchanges within the customer's local calling area, the LEC must, upon request, provide at no charge a copy of the directory or directories that contain the published listing for the entire local calling area.

Public opinion research commissioned by the white pages companies in December 2010 showed that 87 percent of adults support "opt-in" programs for white pages phone books, in which phone customers would no longer automatically receive the directories unless they pro-actively request one. Opt-in would mean immediate relief for millions of annoyed customers, but continue to provide easy and free delivery of directories to the smaller percentage of customers who still want them. Opt in would give people the choice.

Furthermore, reduction of unwanted phone books would eliminate needless waste and unnecessary costs to local jurisdictions with responsibility for waste management.

Thank you very much for the opportunity to comment on potential changes to WAC 480-120-251 as part of your rule-making process.

Sincerely,



Jeanette L. Henderson