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Washington Utilities and Transportation Commission
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Re: UT-120451, White Pages Directory Rulemaking

Sightline Institute is responding to your request for information on the distribution of white pages directories in other states.

Our research shows that the following states have implemented regulatory or legislative opt-in programs for the delivery of white pages:

| | | | | |
|------------|-----------|----------------|--------------|------------|
| Alabama | Kentucky | Missouri | Oklahoma | Washington |
| California | Illinois | New Jersey | Pennsylvania | DC |
| Delaware | Indiana | New York | Texas | |
| Florida | Louisiana | North Carolina | Virginia | |
| Georgia | Maryland | Ohio | Wisconsin | |

How was the transition implemented?

In our examination of eight of those entities (Alabama, [California](#), [Maryland](#), [Missouri](#), [New York](#), [Ohio](#), [Pennsylvania](#), and [Washington DC](#)), we found that Alabama was the only one that did not allow a single-step transition to the opt-in program. Instead, in its decisions both for [Mobile](#) in 2010 and for the [full state](#) in 2012, it only authorized a year-long trial program, although the Mobile program continued for [two years](#).

How were/are consumers notified of their option?

Customers were notified by multiple methods of the delivery programs and of options for obtaining directories.

[Alabama \(Mobile only\)](#): in white and yellow page directories, on insert in yellow pages, in text box on cover of white pages, in press releases, on bill notice, on phone company's website

[Alabama \(full-state\)](#): on cover of directories, within directories, in press releases

[California](#): in product guide; on phone company's website; in press release; on separate sheet on top of all white and yellow page directories during first delivery cycle following the change; on monthly billing notices for one year after the change; on the cover, in the table of contents, and in the customer

information guide of directories; in annual mailer; and in an industry letter to all competitive local exchange carriers

[Maryland](#): in bill notice at least once a year; on phone company's website; in bold, red print on front cover and table of contents page of yellow pages for five years

[Missouri](#): on information sheet delivered with yellow pages and prominently displayed inside yellow pages

[New York](#): in press release, on notices on the cover (permanent) and in the table of contents of business white pages directories and yellow pages, on card insert in directories, on notice on delivery bag enclosing directories, on notice on phone company's website, on message in bill

[Ohio](#): full-page notice in front section of non-residential directories, card or letter accompanying first delivery of yellow pages following change, in welcome letter to new customers

[Pennsylvania](#): in press releases, in bill messages, in messages on cover of yellow pages, on insert in yellow pages, on directory publisher's website, in information sent to new customers when services are ordered

[Washington DC](#): on quarterly bill notices for a year, in bold notice on cover of yellow pages, in various notices inside the yellow pages, on websites of phone company and directory publisher, information to competitive local exchange carriers, in press releases

What has been the success rate for opt-in and opt-out programs in reducing the number of directories?

Our research uncovered the following statistics:

[Alabama \(Mobile only\)](#): 6 percent of customers requested a white pages directory in 2010; 7 percent requested it in 2011

[California](#): With an opt-out program in place, as of the end of 2010, the telephone directory publisher had listed 4,447 opt-out requests from customers in California.

[Florida](#): 2 percent of customers requested a directory

[Georgia \(Atlanta only\)](#): 2 percent of customers requested a directory

Additionally, AT&T [reported](#) this summer that it has stopped delivering phone books in 75 markets across the country. Of the customers in those markets, 97 percent didn't specifically request directories. After two years, only 1 percent of their customers asked for a directory.

Public utility commissions in Alabama, California, Florida, Maryland, Missouri, and New York were tasked with collecting data on the effectiveness of changes to directory delivery.

Thank you for the opportunity to provide information on this matter. Please do not hesitate to contact Sightline Institute if we can be of service to the commission.

Sincerely,

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