



**Frontier Communications Northwest Inc.**  
1800 – 41<sup>st</sup> Street WA0105RA  
PO Box 1003  
Everett, WA 98201-1003  
Fax: 425-261-5262

**Carl Gipson**  
Manager  
Government and External Affairs

**Via WUTC Web Portal**

September 25, 2012

Mr. David Danner  
Secretary and Executive Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P. O. Box 47250  
Olympia, WA 98504-7250

**Re: UT-120451 – Response to Commission Notice of Opportunity to File Response regarding Commission Rulemaking to Consider Modifications to, or Elimination of, the Requirement Related to Distribution of Telephone Books in WAC 480-120-251**

Dear Mr. Danner:

Frontier Communications NW Inc. (“Frontier”) submits these comments in response to the Commission’s Notice of Opportunity to File Response (“Notice”) issued on September 14, 2012. Frontier appreciates the opportunity to further the discussion on the need to amend or modify WAC 480-120-251 and offers the following responses to the Notice.

**Q1: What has been the experience in other states that have adopted either an opt-in or opt-out program for the distribution of directories?**

A: Frontier has partnered with the national yellow page association to give customers an option to opt out of delivery of any directory using the website tools located at <https://www.yellowpagesoptout.com>. Frontier uses the opt-in mechanism only for residential areas where such an initiative has been implemented.

**Q1a: How was the transition implemented (e.g., by flash cut or phased in, and if phased in, over what period of time)?**

A: Frontier utilized the opt-out option, which is available to all users at the same time.

**Q1b: How were/are consumers notified of their option, and what is the number and nature of complaints that have been received about the programs?**

A: Customers are notified on the Frontier.com website and on the covers of our directories as well.

**Q1c: What has been the success rate separately for opt-in programs and opt-out programs in reducing the number of distributed directories?**

A: In the areas where Frontier has implemented residential white page opt-in programs, we have less than a 2 percent take rate, which is consistent with other examples as cited in previous Frontier comments and other parties' comments as well.

**Q2: With respect to the proposal to amend the proposed rules to treat service areas with "co-bound" white and yellow page directories differently than service areas with stand-alone white pages directories, please provide the following information:**

**Q2a: The number of Washington service areas in which co-bound directories currently are being distributed.**

A: Frontier currently serves eighteen different directories in the state of Washington, all of which are published as co-bound directories. Frontier has plans to publish separate bindings in the future (one binding for business white/yellow pages, one for residential white pages).

Frontier currently serves no stand-alone white page directories in the state of Washington and we are unable to provide examples or results to question 2(c).

**Conclusion**

Frontier appreciates the opportunity to provide comments on the proposed rule and looks forward to the rule adoption hearing in October.

Sincerely,



Carl Gipson  
425.261.6380  
Carl.gipson@ftr.com

*CC via email: John Cupp*