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*Via E-mail and UPS*

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

Re: Docket No. UT-120451  
CenturyLink's Comments re: Rulemaking WAC 480-120-251

Dear Mr. Danner:

CenturyLink hereby files its comments in this rulemaking proceeding on whether the Commission should eliminate or modify the current requirement that telecommunications companies provide printed directories.

The Commission noted that comments that respond to the following questions would be most useful:

1. Do all telephone company customers need printed directories of telephone numbers? If not, which types of customers continue to need such directories?

*Response: It is likely that not all customers who have ready access to electronic listings need or want printed directories. However, there are clearly certain types of customers who continue to need or want those directories, including customers that choose not to have internet access or cannot afford it, those that are more familiar with or prefer printed directories, those who wish to obtain listings information without paying a charge for directory assistance, and those who prefer to consult a single definitive source for listings information rather than sorting through the various free and for-charge internet directories.*

2. If all customers do not need printed directories, should the Commission continue to require telephone companies to provide them?

*Response: Because neither CenturyLink, nor the Commission, can be certain which customers rely on printed directories, the Commission should give customers the option to opt out of receiving directories, and allow the companies to deliver only to those customers who have not opted out.*

3. Should telephone companies give their customers the option to receive a printed directory?

*Response: Yes.*

- a. If so, should customers be given the option not to receive a printed directory (opt out) or should customers be required to affirmatively request a directory (opt in)?

*Response: Opt out. It is likely that those customers who most need printed directories, such as the poor, the elderly, and the handicapped, are also those who are least likely to opt in if required to do so.*

- b. What costs would a telephone company incur to implement optional distribution of printed directories?
- c. If any such costs would be significant, how should the company recover those costs?

*Response to b. and c.: The costs to implement optional distribution would vary depending on whether the option is an opt in or an opt out. An opt in is likely to be more costly for the carrier because of numerous requests, if not complaints, from customers who forgot to opt in but who really did want a directory and later found they were relying on an outdated one. In that case, the company incurs administrative costs to respond to those requests, and potentially incurs costs to print additional small volumes of directories to fulfill the requests. Those volumes could have been included in the initial high volume printing, but would not have been because the company didn't have an accurate picture of how many customers would want the directory. It is unclear to CenturyLink how those costs could be recovered, but we look forward to discussing this issue in the course of the rulemaking proceeding.*

4. Should the rule explicitly allow a telephone company to seek an exemption from the rule to relieve it of the obligation to print and/or deliver printed directories to customers? If so, what standard should the Commission consider?

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*Response: CenturyLink supports a rule that continues to require delivery of a printed directory, but which excuses that obligation for individual customer opt out requests.*

5. Should the Commission give telephone companies the option to provide online directories of telephone numbers instead of printed directories?

*Response: CenturyLink believes that the Commission should recognize that many such directories are currently available at no charge to online customers, but that there is no regulatory or market-based reason to require an online directory.*

Sincerely,

Lisa A. Anderl