

October 10, 2012

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

Sightline Institute would like to reiterate and clarify its original comments on the proposed white pages rulemaking, based on consideration of comments submitted by other interested parties.

The UTC's proposal to implement an opt-in delivery program for all white pages listings, both residential and business, will best serve the residents of Washington. The proposal gives all consumers the choice to receive or decline directories, dependent on their needs or preferences.

If consumers want a directory, the UTC's proposed opt-in program ensures they will be able to get it. In the process, all of the state's communities benefit by minimizing waste disposal costs for unwanted directories and by preventing the use of unneeded resources.

In reiterating our position that opt-in best serves the residents of the state of Washington, we carefully considered the comments provided by Dex One, CenturyLink, and WITA, in particular. Dex One makes several excellent points that we would like to emphasize.

First, Dex One references an opt-in rate of 1 to 3 percent. This is perfect evidence that the vast majority of consumers do not wish to receive directories. The UTC's proposed rule makes it easy for the 97 to 99 percent who do not want directories: they don't have to do anything. Sightline agrees with Dex One that an opt-out program is not as effective at reducing delivery of unwanted directories as an opt-in program.

Second, we agree with Dex One that opt in should not be delayed, and enjoyed the humor in its statement "Dex One certainly wishes that consumers were so involved with their directories that they would spend a whole year thinking about one."

Sightline does not agree with Dex One about exempting co-bound directories. Exemptions would make the proposed rule meaningless since Dex One reports that all directories in the state are co-bound. We stand by our position that opt in is the best way to allow consumers the choice to receive or decline directories and to reduce waste.

Thank you again for the opportunity to weigh in on this matter. Please do not hesitate to contact me if we can further assist the commission with its decision.

Sincerely,

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