



City of Seattle
Seattle Public Utilities

October 18, 2012

Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket UT 120451

Seattle Public Utilities is pleased to support the WUTC's proposed rule amending WAC 480-120-251, Directory Service, so that local exchange companies (LEC) may only deliver residential listings directories to customers who request them.

This "opt-in" policy will allow those who want printed local listing directories to obtain them, while avoiding annual delivery of hundreds of thousands of unwanted directories statewide. There will be an enormous reduction in the amount of paper now being used in the printing of local listing directories, with cost savings accruing to solid waste agencies such as SPU that now recycle – and sometimes, unfortunately, landfill some of those phone books.

As noted in our letter of May 18, Seattle operates a web-based phone book opt-out service for city residents and businesses. Since that service began, more than 20 percent of all Seattle residents (about 75,000 addresses) have opened accounts and opted out of phone book deliveries to their homes. Altogether, Seattleites have stopped almost 435,000 individual directory deliveries, saving about 400 tons of paper annually.

Importantly, the vast majority of people who have used this service have opted out of ALL the phone book titles that could be delivered to their homes or businesses. This includes local listings – the white pages. Our data show that almost 70,000 users of the service have declined the white pages as well as yellow pages.

We can't imagine better evidence that large numbers of people no longer want printed local listing directories and that, therefore, the WUTC decision to require white pages delivery only when residents or businesses request them is timely and responds to community wishes.

Thank you for this opportunity to support the proposed change to WAC 480-120-251.

Sincerely,

Timothy Croll
Solid Waste Director

Ray Hoffman, Director
Seattle Public Utilities
700 5th Avenue, Suite 4900
PO Box 34018
Seattle, WA 98124-4018

Tel (206) 684-5851
Fax (206) 684-4631
TDD (206) 233-7241
ray.hoffman@seattle.gov

<http://www.seattle.gov/util>