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## VIA WUTC WEB PORTAL

Mr. David Danner  
Executive Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive, S.W.  
Olympia, WA 98504-7250

### **Re: UT-120451 Response of Dex One to Workshop Questions**

Dear Mr. Danner:

Dex One Corporation (“Dex One”) appreciated the opportunity to participate in the workshop last week in the above-referenced docket. We trust that the information exchanged led to greater understanding and will enable the Commission to proceed reasonably promptly with a rule that will satisfy the needs and demands of the public and the great majority of the stakeholders in the docket who support—at least in part—relaxation of WAC 480-120-251 to permit optional opt-in delivery of residential white pages. This letter responds to two specific questions posed to Dex One at the workshop.

First, Dex One was asked how many consumers set their directory preferences using the Internet versus calling Dex One’s toll free number. For opt-in customers in the Las Vegas, Salt Lake City, and Tucson markets to date in 2012, about 7% have used Dex One’s website and about 93% called Dex One’s toll-free number to request a residential white pages.

Second, there was a question about upcoming deadlines. This winter Dex One will be planning for distribution of its 2013 residential white pages. Lead times for ordering printed copies are several months in major metropolitan markets, as millions of pages must be printed,

bound, and shipped to distribution points in those markets. The deadlines for the Tacoma and Seattle titles are *early January* and mid to late *March*, respectively.

The residential white pages for Tacoma and Seattle are substantial, consuming very large quantities of recycled paper and other resources in markets that have a very high adoption of alternatives and very low demand for residential white pages. Seattle, in particular, has expressed great concern on behalf of its citizens who object to the waste of resources needed to produce, distribute, and then recycle unwanted directories. Accordingly, Dex One will greatly appreciate any steps the Commission may be able to take to expedite the completion of the rulemaking to repeal or modify WAC 480-120-251. The sooner Dex One can implement “upon request” delivery of residential white pages in Washington, the better for all concerned.

Finally, Dex One appreciates the Commission’s consideration of the need to update its directory rule. Dex One is certainly sensitive to the directory needs of the most vulnerable consumers.<sup>1</sup> But it is hard to imagine any consumer who is capable of looking up and calling a phone number in the residential white pages who would not be equally capable of finding and calling the toll free number that appears five times—in extra large fonts—on, in, and around Dex One’s yellow pages, to request the residential white pages. We would be happy to answer any additional questions the Commission may have as it completes this rulemaking process.

Very truly yours,



Brooks E. Harlow

*Counsel for Dex One.*

*CC via email:*

Mr. Jeffrey Goltz  
Mr. Patrick Oshie  
Mr. Philip Jones  
Mr. Brian Thomas  
Mr. Greg Kopta  
Mr. William Weinman  
Mr. John Cupp

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<sup>1</sup> Stereotypes and assumptions about any demographic are not necessarily true, *e.g.* the elderly. Counsel mentioned a recent Georgetown University economic study in the workshop, in which the authors concluded that, “While regulatory reform in landline telecommunications needs to be sensitive to potentially vulnerable segments of society, it should not be sidetracked by nonexistent concerns, such as a “vulnerable” elderly population.” The paper can be found here: [http://www.gcbpp.org/files/EPV/EPV\\_Mayo\\_Macher\\_Wireless\\_Revolution\\_the\\_Elderly.pdf](http://www.gcbpp.org/files/EPV/EPV_Mayo_Macher_Wireless_Revolution_the_Elderly.pdf)