

November 12, 2012

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

Sightline Institute supports the UTC's proposed removal of the requirement to publish white pages. The draft rule, proposed on October 31, provides opportunities to decrease the waste of natural resources by directory publishers and reduce the disposal costs incurred by the public for unwanted directories. The rule also takes a step toward increasing satisfaction among consumers – potentially giving Washington residents a say over whether unwanted materials are left on their doorsteps.

Sightline is disappointed, however, that the latest proposal does not do more to serve the public. Studies have shown that only [11-30](#) percent of people use the white pages – numbers that will likely decline as information technology becomes more widespread. Given the low rates of use of the white pages, Sightline believes that the UTC would better serve the public interest if it required LECs to operate an opt-in system for distribution of residential and business white pages.

Regardless, we ask that the UTC change the phrase “access to directory listings” in section (2) of the proposal to “free access to directory listings.”

Additionally, unless the items listed in section (6) of the current code – the consumer information guide -- are required to be published elsewhere, Sightline believes the Commission should retain that section of the code.

Thank you for the opportunity to comment.

Sincerely,

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