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**Via WUTC Web Portal**

November 14, 2012

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

**Re: UT-120451 – Rulemaking to Consider Modifications to, or Elimination of, the Requirement Related to Distribution of Telephone Books in WAC 480-120-251**

Dear Mr. Danner:

On October 31, 2012, the Commission issued a Notice of Opportunity to Comment on proposed language amending WAC 480-120-251 related to the requirement of local exchange carriers to distribute telephone books.

Frontier Communications Northwest Inc. (“Frontier”) appreciates the opportunity to comment on the ongoing effort of the Commission to update its rules to reflect today’s marketplace and greater consciousness for reducing waste of resources.

Frontier proposes that the Commission completely eliminate the mandate in WAC 480-120-251 for the reasons laid out in our previous comments in this docket. Evidence provided by both Frontier and other commenters in this docket have shown that a vast majority of customers do not opt into receiving printed white page directories when given the choice.<sup>1</sup>

However, if the Commission feels the rule cannot be completely eliminated, Frontier proposes two minor changes to the proposed rule in an attempt to clear up potential ambiguities. Some of the language in subsection (a) is redundant with the requirement in subsection (b) and should be stricken. The revised rule should read as follows:

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<sup>1</sup> See comments of Dex One, Sightline Institute, *et al.* in Docket UT-120451.

WAC 480-120-251  
Directory Listings.

(1) Basic local exchange service includes access to directory listings comprised of the name, address, and primary telephone number for each customer that the local exchange company (LEC) serves in a local calling area unless the customer requests to exclude some or all of this information from the LEC's directory listings.

(2) A LEC must ensure that each of its basic local exchange service customers has access to directory listings for the customer's local calling area through at least one of the following means:

(a) Electronically via a document, database, or link on the LEC's website, ~~provided that the LEC also distributes or arranges to distribute printed directory listings to all of the LEC's customers who request a printed directory;~~ and/or

(b) In hard copy via publishing or arranging to be published a printed telephone directory that includes the directory listings and distributing that directory to the LEC's customers, ~~provided that a printed telephone directory shall not be distributed to any customer who requests not to receive a printed directory.~~

(3) A LEC must establish reasonable means for its customers to request to exclude some or all of their information from the LEC's directory listings and to request to receive, or not to receive, a printed directory.

Frontier pointed out at the October 18 directory workshop that it has little or no economic incentive to continue publication and distribution of residential white page directories to customers who have already chosen not to receive these publications. Therefore, establishing a prescribed mandate for LECs or print publishers and distributors to honor an already-established distribution system is unnecessary.

Frontier appreciates the opportunity to provide comments on the proposed rule and looks forward to further collaboration as warranted.

Sincerely,



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*CC via email: John Cupp*