



City of Seattle
Seattle Public Utilities

November 14, 2012

David W. Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Dr. SW
Olympia, WA 98504-7250

By e-mail: Attn: John Cupp
jcupp@utc.wa.gov

Re: Docket UT-120451, Distribution of White Pages Telephone Books

Thank you for the opportunity to comment on the changes proposed to UTC rules governing the distribution of white pages telephone books subsequent to the workshop of October 18 which was attended on our behalf by Dick Lilly, Seattle Public Utilities' (SPU) manager for waste prevention.

As noted in our earlier comments, SPU is pleased that the UTC has recognized the changes taking place in telephone use, particularly searches for directory listings, as a result of the dramatic increase in mobile phone ownership and growing reliance on easily accessed on-line information. For many people, these changes have made receipt of telephone directories, both yellow pages and white pages, an unwanted nuisance. From our point of view at SPU, these unwanted directories have become an unnecessary use of resources (virgin wood and recycled paper fiber) and an unwanted burden on recycling and waste disposal programs.

Therefore, we commend the UTC for the commission's recommended changes in WAC 480-120-251 that will allow Local Exchange Companies the option of choosing between on-line service coupled with printed directories available to customers who "opt-in" for directory delivery, and provision of printed directories to all customers except those who "opt-out" of delivery. This plan will reduce the production of unwanted directories with their attendant waste while providing all customers with the level of service they desire.

Further, in view of the extensive public and industry input including the recent workshop, SPU urges the UTC to issue in a new CR-102 the changes to WAC 480-120-251 put forth in

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the request for comment distributed October 31, 2012. Measured but timely action will allow affected companies to make changes in their procedures for 2013 white pages phone directory distributions. Thank you.

Sincerely,

Timothy Croll
Solid Waste Director