

January 8, 2013

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

Sightline Institute again suggests that the UTC change the phrase “access to directory listings” in section (2) of the supplemental proposal, published on December 20, to “free access to directory listings . . . .” We believe that all customers should have the same ability to obtain information, regardless of their economic circumstances.

We also reiterate our previous comments. Sightline is pleased that the UTC’s proposal modernizes the rule relating to the publication of white pages telephone directories. By removing the requirement to publish paper copies of the directories, the state allows local exchange companies (LECs) to reduce their use of our natural resources, to lighten the burden on our waste disposal systems, and to better serve the state’s residents, the vast majority of whom do not use the directories.

However, opt-out systems, as allowed in the proposal, have been shown to be far less effective than opt-in systems in which consumers must explicitly order directories if they want them. By allowing LECs to use an opt-out system instead of an opt-in system, the UTC is missing a prime opportunity to reduce waste and better serve Washington consumers by reducing the delivery of unwanted publications.

Thank you for the opportunity to comment.

Sincerely,

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