



City of Seattle
Seattle Public Utilities

January 22, 2013

David W. Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 Evergreen Park Drive SW
Olympia, WA 98504-7250
Via e-mail to WUTC Records Center, records@utc.wa.gov

Re: Docket UT 120451 relating to the distribution of "white pages" phone directories

Dear Mr. Danner:

Thank you for the opportunity to comment. We appreciate the efforts the Commission has made to accommodate the various needs of the local exchange companies (LECs) for alternative ways to respond to the needs of their customers. We also appreciate the Commission's attention to the problem of paper waste when, during this time of transition in the industry, many unwanted and unneeded directories get printed and distributed.

Seattle Public Utilities, therefore, supports the WUTC's proposed changes to WAC 480-120-251, particularly section (2)(a) which allows LECs to offer printed directories on an opt-in basis, that is, only to customers who request them. This change will significantly reduce paper waste in those areas where LECs choose the opt-in option. As you know, Seattle's opt-out system has allowed delivery opt-outs for both yellow pages and white pages directories. Almost all of the Seattle residents and businesses (more than 75,000, or more than 20% of residents) that have opted out of yellow pages have also opted out of white pages delivery, a clear indication that the need for printed white pages has dramatically declined.

On balance, SPU believes the proposed rule contains the flexibility the LECs requested along with the waste prevention benefit that will come from LECs choosing the opt-in option, as well as from the requirement in (2)(b) that LECs choosing to publish paper editions of their directories "shall not be distributed to any customer who requests not to receive a printed directory."

We urge the Commission to enact the rule amendment as written.

Sincerely,

Timothy Croll
Solid Waste Director

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