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**Carl Gipson**  
Manager  
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**Via WUTC Web Portal**

January 22, 2013

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 – Comments on Supplemental Proposal on 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 December 20, 2012, the Commission issued a Notice of Opportunity to Submit Written Comments on the Supplemental Proposal amending WAC 480-120-251 related to the requirement of local exchange carriers to distribute telephone books.

Frontier Communications Northwest Inc. (“Frontier”) once again appreciates the opportunity to comment on the ongoing effort of the Commission to update its rules to better reflect today’s marketplace and implement a better system to reduce the waste of resources.

Frontier continues to advocate for the complete elimination of the rule. Today’s technological environment provides customers with myriad options for finding directory information. Frontier does acknowledge that not every Washington citizen owns or has ready access to a computer or other electronic device in order to search for such information.

Therefore, as an alternative to complete elimination of the rule, Frontier has advocated for adoption of an “opt-in” rule, where customers who wanted directory information could obtain such information by contacting Frontier and request such material in either printed or electronic form (*e.g.* CD-ROM).

Frontier is largely supportive of the proposed rule, which introduces consumer choice by allowing local exchange carriers to provide directory listing information via electronic means. The proposed rule also allows for an “opt-in” system, where customers who would like a paper version of the directory may request one. Frontier believes the rule as proposed accomplishes the goals of ensuring information finds

its way into the hands of customers who want it, while allowing for the substitution of technology for printed publications in order to conserve resources.

Frontier appreciates the opportunity to provide comments on the proposed rule and looks forward to participating in the rule adoption hearing on February 14.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Gipson', with a stylized flourish at the end.

Carl Gipson  
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*CC via email: John Cupp*