

**BEFORE THE  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

Re: Rulemaking to Consider Modifications to, or )  
Elimination of, the Requirement Related to )  
Distribution of Telephone Books in ) Docket UT-120451  
WAC 480-120-251 )  
 )  
 ) COMMENTS OF DEX ONE  
Notice of Opportunity to File Written ) CORPORATION RE SUPPLE-  
Comments Issued December 20, 2012 ) MENTAL CR-102 (Jan. 22, 2013)  
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\_\_\_\_\_ )

**COMMENTS OF DEX ONE CORPORATION**

Pursuant to the Commission’s December 20, 2012, Supplemental CR-102 and Notice of Opportunity to Comment (“Notice”) Dex One Corporation (“Dex One”) files these comments on the proposed revisions to WAC 480-120-251 (“Directory Rule”). Dex One appreciates the Commission’s ongoing efforts to modernize its Directory Rule to better serve the public interest by allowing LECs and directory publishers to tailor the method of delivery of residential white pages to consumer needs and demands. After further review and analysis of the Proposed Rule and its contracts with CenturyLink, Dex One supports adoption of the Proposed Rule.<sup>1</sup> Notwithstanding the concerns Dex One expressed in its prior comments, the Proposed Rule is reasonable and will eliminate the needless waste caused by the current Directory Rule by eliminating the requirement of saturation delivery of residential white pages.

For the foregoing reasons and the reasons set forth in its prior comments in this docket, Dex One urges the Commission to adopt the Proposed Rule as published with the Notice. The

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<sup>1</sup> Dex One still holds the position that the mandatory opt-out provision in the Proposed Rule is inconsistent with the First Amendment. *See Dex Media v. Seattle*, 696 F.3d 952 (9th Cir., 2012), *reh’g denied*, \_\_\_ F.3d \_\_\_ (Jan. 3, 2013). However, if the Commission is unwilling to change that provision, Dex One’s disagreement with this provision should not delay further the adoption of the Proposed Rule because immediate relief from mandatory saturation delivery is needed in Washington.

Proposed Rule will be a vast improvement over the current Directory Rule and the sooner it can be implemented the better.

Respectfully submitted,



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Brooks E. Harlow  
Lukas, Nace, Gutierrez & Sachs, LLP  
8300 Greensboro Drive, Suite 1200  
McLean, VA 22102  
Tel: (703) 584-8678  
Fax (703) 584-8680

*Counsel for Dex One Corporation*

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