**RULEMAKING: Distribution of White Pages Directories**

**DOCKET UT-120451**

**Comment Matrix**

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| **General Comments** | | |
| **Commenter** | **Comment** | **Staff Position** |
| Jeanette Henderson | Proposed rule would be improved if the printed directory option in (2)(b) were opt-in rather than opt-out.  “Otherwise, the proposed rule is an excellent improvement over the existing rule.” | Staff believes the revised rule as currently drafted strikes the appropriate balance between company, customer, and environmental concerns and does not recommend accepting this change. |
| Sightline Institute  Represented by Eric de Place | In (2), the word “free” should be added, to read, :…free access to directory listings…”  Believes the printed directory option in (2)(b) should be opt-in rather than  opt-out. | *See* first Staff position statement above. In addition, inclusion of “free” is unnecessary because the rule already states that access to directory listings is included with local exchange service. |
| Seattle Public Utilities  Represented by Timothy Croll | “We urge the Commission to enact the rule amendment as written.” | Staff agrees. |
| Frontier Communications  Represented by Carl Gipson | Existing rule should be eliminated. As an option to eliminating the existing rule, an opt-in rule should be implemented.  “Frontier is largely supportive of the proposed rule…” | *See* first Staff position statement above. |
| Public Counsel  Represented by Lisa Gafken | Pleased that the language in (4), related to updating directories no less frequently than every 15 months, is being retained.  Believes the rule should require saturation distribution of “Blue Pages.”  Believes the rule should state that directories must be provided free of charge.  Believes the consumer rights and responsibilities guide, required in (6) of the existing rule, should continue to be required in the new rule. | *See* first and second Staff position statements above. In addition, whether to include information in addition to listings in directories should be a decision for the LEC to make. |
| WITA  Represented by Betty S. Buckley | “WITA supports the proposed revisions contained in the Notice and the Supplemental CR-102.” | Staff agrees. |

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| Century Link  Represented by Lisa Anderl | Believes the language in (2), which reads:  “ A LEC must ensure that each of its basic local exchange service customers has access to directory listings for the customer's local calling area through at least one of the following means:” Should be modified as follows:  “A LEC shall determine how each of its basic local exchange service customers will receive access to directory listings for the customer's local calling area using at least one of the following means:” | Staff does not believe that the language CenturyLink proposes is substantively different than the language in the latest proposed revised rule but would not object to making the suggested change. |
| Dex One  Represented by Brooks Harlow | Believes the mandatory opt-out provision is “inconsistent with the First Amendment,” however supports the rule as proposed in the Supplemental  CR-102. | Staff disagrees with Dex One’s constitutional analysis but otherwise agrees. |