



City of Seattle
Seattle Public Utilities

March 27, 2013

Steven V. King
Acting 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, comments on the Commission's second supplemental proposed rule

Dear Mr. King:

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). 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 as families and businesses switch to electronic directory services.

As noted in our earlier comments, Seattle Public Utilities, therefore, supports the WUTC's proposed changes to WAC 480-120-251, particularly section (2)(a) which would oblige LECs only to provide electronic access to directory listings and to provide printed directories on an opt-in basis, that is, only to customers who request them. This change will significantly reduce paper waste. 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 that have opted out of yellow pages (more than 20% of residents or 75,000 families) have also opted out of white pages delivery, a clear indication that the need for printed white pages has dramatically declined.

SPU believes the proposed rule contains the flexibility the LECs have requested along with the waste prevention benefit that will come from the primary use of electronic directory listing services coupled with an opt-in option for customers wanting a printed directory.

We urge the Commission to enact the proposed second supplemental rule amendment.

Sincerely,

Timothy Croll
Solid Waste Director

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