

**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 SECOND
Comments Issued March 1, 2013)	SUPPLEMENTAL CR-102
)	

COMMENTS OF DEX ONE CORPORATION

Pursuant to the Commission’s March 1, 2013, Second 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 further 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. Dex One also appreciates that the latest version of the proposed rule ensures that LECs must provide listings electronically, in addition to allowing for “upon request” distribution of printed directories.

Dex One supports the rule as proposed in the Notice and urges its prompt adoption. Overall, it is reasonable and will eliminate the needless waste mandated under the current Directory Rule by eliminating the requirement of saturation delivery of residential white pages. Dex One understands that other parties may suggest further clarifying changes to the proposed rule. Should alternatives be proposed, Dex One may provide supplemental comments. Dex One would prefer a rule with no ambiguities, but the goal of perfection is always elusive and time and resources are also a consideration.

Dex One would likely oppose any changes that would delay an adoption vote beyond the currently scheduled hearing date of April 11, 2013. Dex One's printer order deadline for Seattle and the Seattle metro area is less than two weeks after the April 11th hearing date. Any further delay in adoption could force Dex One into another year of saturation delivery of largely unwanted and unused residential white pages to almost 250,000 Seattle and metro area households. It would be a shameful waste to prolong saturation delivery for yet another year in such a large and environmentally-conscious market.

Conclusion

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 by no later than April 11, 2013. While the proposed rule may not be perfect, it is a vast improvement over the current Directory Rule and the sooner it can be implemented the better.

Respectfully submitted,



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