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

March 29, 2013

Mr. Steven V. King  
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 Second 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. King:

On March 1, 2013, the Commission issued a Notice of Opportunity to Submit Written Comments on Second Supplemental Proposal and Notice of Proposed Rule Adoption Hearing amending WAC 480-120-251 related to the requirement of local exchange carriers to distribute telephone books.

Frontier Communications Northwest Inc. (“Frontier”) appreciates again the opportunity to comment on the continual effort by the Commission to update its rules to better reflect today’s marketplace and implement a more efficient 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 recognizes that not every Washington citizen owns or has ready access to a computer or other electronic device in order to search for such information. As an alternative to complete elimination of the rule, Frontier supports adoption of an “opt-in” rule, whereby customers who want directory information could obtain such information by contacting Frontier and requesting such material in either electronic or printed form.

Frontier was largely supportive of the previous amendatory language as proposed in the supplemental CR-102, noticed on December 12, 2012 and Frontier continues to be largely supportive of the current proposed language.

However, Frontier does suggest amending the proposed language as such:

(2) A LEC must ensure that its basic local exchange service customers have access to directory listings ~~for the~~ of its customers' local calling area by making those listings available electronically via a document, data base, or link on the LEC's web site. The LEC also must distribute or arrange to distribute printed directory listings to all of the LEC's customers who request a printed directory. A LEC is not otherwise required to distribute a printed directory.

The proposed change would alleviate the potential problem of a LEC being required to provide directory listings for those listings it may not have (such as wireless and CLEC customer listings).

Frontier appreciates the opportunity to provide comments on the proposed rule and will continue to work with the Commission for adoption of the rule.

Sincerely,

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

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