

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

RULEMAKING RELATED TO THE
MANDATORY DISTRIBUTION OF
WHITE PAGES DIRECTORIES BY
LOCAL EXCHANGE CARRIERS IN
WAC 480-120-251(3).

Docket No. UT-120451

CENTURYLINK'S FIFTH REPLY
COMMENTS

- 1 CenturyLink hereby submits its comments on the proposed directory rule as requested in the Commission's Notice of March 1, 2013. The Commission provided notice of an opportunity to file written comments on a supplemental proposal (Supplemental CR-102) related to distribution of telephone books in WAC 480-120-251.
- 2 CenturyLink continues to support an opt-out approach for directory distribution. With an opt-in approach, customers who are relying on printed phone books would no longer receive them, without any notice of the discontinuance.
- 3 In addition, because Dex will continue to adhere to an opt-out approach for its yellow pages publications, it makes sense to parallel that process for white pages. Environmentally, there are more versions of a yellow pages directory that are distributed to homes than there are versions of the white pages, which often is just one.
- 4 If the Commission chooses the opt-in approach, the rule should be modified so as to only apply to residential white pages, not business listings in the white pages. This is so that if Dex delivers a combined business white pages and yellow pages directory to a customer who has opted out of white pages under (3) of the Commission's proposed rule, but not out of the yellow pages distribution, that neither CenturyLink nor Dex would be in violation of the

requirement under (3).

- 5 An opt-in approach should also be phased, with customers receiving a minimum of one additional cycle of the white pages directory, with a notice as to how to continue to receive the directories in the future.
- 6 In addition, CenturyLink supports a modification to (2) of the rule so that CenturyLink is obligated only to provide access to directory listings of its own customers and the customers of those carriers who provide their listings to CenturyLink at no charge for inclusion in the electronic directory. Otherwise CenturyLink has no ability to control its costs for those listings, or to even ensure that it can obtain them. The current rule only requires that requesting customers be provided with books from other carriers within their local calling area – not an electronic listing.

Respectfully submitted this 29th day of March, 2013.

CENTURYLINK, INC.
QWEST CORPORATION

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