



Seattle City Councilmember Mike O'Brien

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May 21, 2012

Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia WA 98504-7250
Attn: John Cupp

Re: CR 101, Docket UT 120451 (by e-mail)

Thank you for the opportunity to provide comment on the proposed changes to WAC 480-120-251.

As a Seattle City Councilmember, I sponsored Seattle's 2010 ordinance to create a new registry allowing residents and businesses to express their preferences to stop unwanted deliveries of yellow pages directories. Under the ordinance, telephone directory publishers delivering books in Seattle must abide by the customer preferences or risk being fined. Seattle passed this ordinance for three reasons: (1) as a part of Seattle's Zero Waste Strategy to reduce the amount of waste generated in Seattle, (2) for the environmental benefits of saving paper and reducing delivery trips in Seattle, and (3) because we heard from numerous people in the community that they no longer use printed directories and do not want them delivered to their homes without their permission. So far, about 70,000 residential and business addresses having opted out of their phone books, saving about 375 tons of paper each year.

In addition, the city estimated the cost of recycling phone books prior to our opt-out system to be \$350,000 per year. By reducing unwanted books, we reduce the cost to utility rate-payers for their recycling and disposal.

1. Do all telephone company customers need printed directories of telephone numbers? If not, which types of customers continue to need such directories?

No. Seattle's experience shows that many people simply do not want to receive phone books anymore, and as more residents and businesses in our city learn about Seattle's opt out system, our numbers continue to grow. About 20% of all addresses in the city opted out of receiving yellow pages directories in the first year of the program. We suspect that people who still rely on phone books are less likely to have access to the internet or adequate computer literacy. This could include populations of seniors, low-income households, immigrants and refugees or others with language barriers.

2. If all customers do not need printed directories, should the Commission continue to require telephone companies to provide them?

I strongly suggest eliminating the requirement to provide printed directories. Many people I have spoken with are upset the telephone companies have the right to leave multiple directories on their doorstep without their permission. I have heard constituents complain this is a violation of their privacy and that it amounts to littering on their property. I would like to see a system that allows people to opt in to receiving the directories they want and will use.

3. *Should telephone companies give their customers the option to receive a printed directory?*
a.) *If so, should customers be given the option not to receive a printed directory (opt out) or should customers be required to affirmatively request a directory (opt in)?*
b.) *What costs would a telephone company incur to implement optional distribution of printed directories?*
c.) *If any such costs would be significant, how should the company recover those costs?*

I strongly suggest the Commission implement an opt-in system for customers who choose to receive a printed directory. The most efficient way to manage costs of an opt-in system would be for the phone companies to make the directories available for free pickup at popular locations in a city or town, for example, at community centers, libraries, retail stores, groceries or even USPS locations. This approach has the added benefit of reducing traffic from delivery vehicles on our neighborhood streets and reducing greenhouse gases.

4. *Should the rule explicitly allow a telephone company to seek an exemption from the rule to relieve it of the obligation to print and/or deliver printed directories to customers? If so, what standard should the Commission consider?*

Under an opt-in model there would be no need to create such exemptions and we will see less waste, less fuel consumption, less traffic on our roads and lower costs for our public utility ratepayers (since there will be less books to recycle).

5. *Should the Commission give telephone companies the option to provide online directories of telephone numbers instead of printed directories?*

There are some communities, particularly in rural areas, with no access to the internet. These communities may still need or want printed directories, and an opt-in system allows them to continue receiving them. That said, in a city like Seattle, an online directory would serve most people well and is indeed how many people in Seattle access this information already.

Thank you for the opportunity to comment and for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike O'Brien", with a long horizontal flourish extending to the right.

Mike O'Brien
Seattle City Councilmember