



**City of Seattle**  
Seattle Public Utilities

May 18, 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)

Seattle Public Utilities is pleased to comment on the proposed changes to WAC 480-120-251, requirements for Local Exchange Companies to provide "white pages" directory listings to all subscribers in local service areas. Our comments have been formatted as replies to the questions posed in the Commission's announcement, as recommended.

In considering our comments, the Commission should know that SPU by City Ordinance operates a program allowing residents and businesses to decline delivery of yellow pages directories and can impose fines on directory publishers that fail to honor those requests. Many of the program's users also decline residential listings and the LEC contractor, Dex, to our knowledge, honors such requests. The program, put in place to reduce the amount of paper used for the printing of unwanted directories, currently saves about 375 tons of paper each year, with opt-outs continuing to increase.

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

No, they do not. One fifth of residence and business addresses in Seattle have made use of the City's [www.seattle.gov/stopphonebooks](http://www.seattle.gov/stopphonebooks) site, phoned in or mailed a post card to decline delivery of both white and yellow pages. Most users have chosen to decline all phone books. Our analysis of program user addresses by zip code shows use rates ranging from 7 percent to 30 percent of addresses. The lower user rates are roughly coincident with lower income neighborhoods.

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

Our experience has been that many customers do not want directories of any type and are troubled when they receive them because of the obvious waste. Given that, we suggest that the Commission require the provision of directories only in response to customer request, allowing LECs to determine themselves what additional steps they will take to provide broad access to

Ray Hoffman, Director  
Seattle Public Utilities  
700 5<sup>th</sup> Avenue, Suite 4900  
PO Box 34018  
Seattle, WA 98124-4018

Tel (206) 684-5851  
Fax (206) 684-4631  
TDD (206) 233-7241  
[ray.hoffman@seattle.gov](mailto:ray.hoffman@seattle.gov)

<http://www.seattle.gov/util>

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residential and business listings. Today, some publishers place yellow pages directories on racks at supermarkets for customer pickup. Such a system could effectively be used to distribute "white pages" listings to those who want them, and would serve to get directories to those families without access to on-line information services (fewer than 20 percent in Seattle).

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?*

As noted in our response to question 2, SPU suggests the Commission base directory distribution on customer choice using an "opt-in" process. Such a system would work very effectively and fairly if LECs or their contractors make directories available for free pickup at numerous public locations. With that approach, customers don't need to remember to "opt-in," nor will the companies face the administrative cost of tracking large numbers of affirmative choices. Yes, cost to companies per unit would rise for any delivery system in response to individual "opt-ins," but would drop to the degree that, through publicity, the companies are able to educate their customers that the easiest way to get a directory is to pick one up at the grocery store, drug store or perhaps branch library or community center. SPU believes that with a few years' experience, LECs will have a very good idea of how many directories need to be printed and, importantly, this will be fewer than presently produced, saving paper and reducing cost.

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?*

SPU believes the Commission would best serve its regulated companies by allowing LECs at their discretion to set up an "opt-in" process or to continue to operate under the present rule. No formal exemption need be required, though the Commission reasonably would want to review companies' "opt-in" program plans. However, SPU also believes that a complete and mandatory change to an opt-in system for all companies would result in less waste and less energy consumption and recognize shifts in directory-user behavior to electronic media that will only continue as computer and cell phone use becomes nearly universal.

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

It is our understanding that telephone companies already provide such online directories. But if the Commission formally rules that printed directories are no longer required, then LECs should be required to make the information available online.

Thank you for the opportunity to comment.

Sincerely,



Timothy Croll  
Solid Waste Director