

RULEMAKING: Distribution of White Pages Directories
DOCKET UT-120451
Comment Matrix

Question 1: Do all telephone company customers need printed directories of telephone numbers? If not, which types of customers continue to need such directories?		
Commenter	Comment	Staff Position
Collier Technologies Represented by C.J. Adams-Collier	No, not all customers need a printed directory. Only customers that request a printed directly need one.	Staff agrees that not all customers need a printed directory but that customers without internet access may need a printed directory. Accordingly, Staff believes that customers should be given the option to receive a printed directory.
Jeanette L. Henderson	No, not all customers need a printed directory.	
Century Link Represented by Lisa Anderl	No, not all customers need a printed directory. Only customers without internet access or who prefer a printed directory need one.	
Dex One Brooks Harlow	No, not all customers need a printed directory. Only customers that request a printed directly need one.	
Frontier Communications Represented by Carl Gipson	No, not all customers need a printed directory. Only customers without internet access need one.	
Public Counsel Represented by Lisa A. Gafken	Yes. Customers who do not have computers in their home, do not have access to the internet or have traditionally relied on printed materials due to age or other factors. Public Counsel states that it is very difficult for the Commission, or any party, to determine which individual customers may require printed White Pages directories. Customers themselves are in the best position to determine what they require and should therefore always be given the option to receive a printed copy of a White Pages directory.	
Seattle City Council Represented by Councilmember Mike O'Brien	No, not all customers need a printed directory. Only customers without internet access or computer literacy need one. This could include seniors, low-income households, and immigrants, refugees or others with language barriers.	
Seattle Public Utilities Represented by Timothy Croll	No, not all customers need a printed directory.	
Sightline Institute Represented by Eric de Place	No, not all customers need a printed directory. It is impossible to determine in advance which "types" of customers might continue to need print directories.	
WITA Represented by Richard Finnigan	No, not all customers need a printed directory. Only customers without internet access need one.	
Broadband Communications Association of Washington (BCAW) Represented by Ron Main	No. Only customers without internet access or who prefer a printed directory need one. Those customers should have the option to pick up a printed directory at newsstands, libraries, retail stores and community centers.	

Question 2: If all customers do not need printed directories, should the Commission continue to require telephone companies to provide them?		
Commenter	Comment	Staff Position
Collier Technologies	No, UTC should not require companies to provide printed directories, except on request.	Staff agrees that companies should be required to provide printed directories only upon request. Staff believes a rule change is necessary as printed directories are becoming increasingly obsolete, create a disposal problem, and are a waste of resources.
Jeanette L. Henderson	No, UTC should not require companies to provide printed directories to every customer.	
Century Link	No, UTC should not require companies to provide printed directories. The commission should allow customers the option to opt out of receiving directories, and allow companies to deliver only to those customers who have not opted out.	
Dex One	No, UTC should not require companies to provide printed directories. Washington's rule is outdated, and it is time to repeal it or scale it back significantly.	
Frontier Communications	No, UTC should not require companies to provide printed directories.	
Public Counsel	Yes, UTC should require companies to provide printed directories. Public Counsel does not believe a change to WAC 480-120-151 is warranted at this time.	
Seattle City Council	No, UTC should not require companies to provide printed directories.	
Seattle Public Utilities	No, UTC should not require companies to provide printed directories, except on request.	
Sightline Institute	No, UTC should not require companies to provide printed directories.	
WITA	No, UTC should not require companies to provide printed directories.	
BCAW	No, UTC should not require companies to provide printed directories.	

Question 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?

Commenter	Comment	Staff Position
Collier Technologies	<p>Yes, companies should give customers the option to receive a printed directory.</p> <ul style="list-style-type: none"> a. On an opt-in basis. b. Annually it would cost \$500 for the initial book, and \$5 per book thereafter. c. 50% customer contribution, 50% reduction in regulatory fees. 	<p>Staff agrees that companies should give their customers the option to receive a printed directory. Staff believes an opt-in basis to be the best option, provided that customers are given reasonable options for requesting a written directory and adequate notice that they will only receive a directory upon request.</p> <p>Staff further takes the position that the local exchange carrier should continue to recover the costs associated with providing printed directories upon request in the same manner those companies recover the costs under the current rule.</p>
Jeanette L. Henderson	<p>Yes, companies should give customers the option to receive a printed directory.</p> <ul style="list-style-type: none"> a. On an opt-in basis. 	
Century Link	<p>Yes, companies should give customers the option to receive a printed directory.</p> <ul style="list-style-type: none"> a. On an opt-out basis. b. and c. Costs would vary, depending on whether the option is an opt-in or an opt-out. It is unclear how those costs could be recovered. 	

Dex One	<p>The Commission should deregulate directories and repeal the rule.</p> <ol style="list-style-type: none"> a. Under Dex One’s publishing agreement with CenturyLink, CenturyLink probably would incur no direct costs for Dex One to move to an upon-request program for distribution of the official CenturyLink White Pages. b. If the rule is repealed or made optional at the discretion of the publisher, there should be no need for cost recovery. However, were the Commission to mandate upon-request delivery of White Pages, that could add costs in many markets by requiring creation of separate directories and distribution schemes for White Pages and yellow Pages where it is not economical to do so. 	
Frontier Communications	<ol style="list-style-type: none"> a. On an opt-in basis. b. Short-term costs incurred would be offset by long-term relief from the requirement to print and distribute directories. c. The cost to transition towards an “opt-in” system should not be significant, but in the event of a need to recover the cost of the transition, the Commission could provide for a means of revenue-neutral adjustment on a streamlined basis. 	
Public Counsel	<ol style="list-style-type: none"> a. If modification to the distribution of printed White Pages directories is allowed, all customers should have the option to receive a printed copy of the directory, free of charge. b. Costs are best addressed by individual telephone companies and should be factored into any individual company request to begin offering optional distribution of printed directories. c. If costs to move to optional distribution outweigh the standard costs to distribute printed directories to all customers, then optional distribution should be abandoned and all customers should continue to receive printed directories. 	
Seattle City Council	<ol style="list-style-type: none"> a. On an opt-in basis. b. 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. 	

Seattle Public Utilities	<p>Yes, companies should give customers the option to receive a printed directory.</p> <ul style="list-style-type: none"> a. On an opt-in basis. b. Costs to companies per unit would rise for any “opt-in” program, but would drop to the degree that companies are able to educate 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. 	
Sightline Institute	<p>Yes, companies should give customers the option to receive a printed directory.</p> <ul style="list-style-type: none"> a. On an opt-in basis. b. A telephone company may incur costs for notifying customers of their “opt-in” rights, printing and delivering directories, and small costs for regulatory compliance, such as data reporting. c. It is highly unlikely that any of the costs described above would exceed the costs of the current system of universal mandatory delivery. In fact, the changes suggested by Sightline would almost certainly save substantial costs. Companies would not need to recover any costs. 	
WITA	<p>It should be a company's choice whether to provide a directory or not.</p> <ul style="list-style-type: none"> a. If it does provide a directory, then an opt-out type of provision seems to make sense. b. As to the cost, WITA is not aware whether the cost has been studied to determine whether such an opt-out choice would be more or less expensive than providing directories today. 	
BCAW	<ul style="list-style-type: none"> a. Consumers should have the option to receive printed directories. b. AT&T’s and Verizon’s requests for waiver of directory distribution rules implied the companies would save substantial costs by implementing processes for optional distribution of printed directories, in comparison with the universal distribution of printed directories. c. AT&T’s and Verizon’s requests for waiver of directory distribution rules did not seek cost recovery. BCAW does not believe any ILEC’s costs should be recovered from other carriers or other carriers’ customers. 	

Question 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?

Commenter	Comment	Staff Position
Collier Technologies	Yes, companies should be allowed by an explicit rule to seek an exemption. The standard should be the most local of a) county regulations b) RCW/WAC c) CFR.	Current rules generally authorize companies to seek exemption from, or waiver of, Commission rules as circumstances warrant, and Staff sees no need at this time to include a specific authorization to seek an exemption from this rule.
Century Link	CenturyLink supports a rule that continues to require delivery of a printed directory, but which excuses that obligation for individual customer opt-out requests.	
Dex One	The Commission already has an applicable exemption rule, WAC 480-07-110. The standard is the public interest, which is appropriate for exemptions to the directory rule.	
Frontier Communications	The Commission should amend the rules so that the opt-in system is the default method. This would eliminate the need for companies to petition for a waiver of the rules and would relieve the Commission of the burden of reviewing, analyzing, and approving each petition.	
Public Counsel	No, companies should not be allowed by an explicit rule to seek an exemption. Any request to modify the obligation to print and/or deliver printed directories to customers should be triggered by an individual company's request. A company can already make such a request for exemption under WAC 480-120-015.	
Seattle City Council	No, companies should not be allowed by an explicit rule to seek an exemption. Under an opt-in model there would be no need to create such exemptions.	
Seattle Public Utilities Timothy Croll	The Commission should allow LECs to set up an "opt-in" process or to continue to operate under the present rule.	
Sightline Institute	The Commission should allow LECs to set up an "opt-in" process. This would result in less waste, more cost savings, and better public policy.	
WITA	If the Commission accepts the recommendation from WITA, there would be no need for an exemption process.	
BCAW	Yes, companies should be allowed by an explicit rule to seek an exemption. If the Commission grants an ILEC a waiver, the Commission should simultaneously grant a waiver to competitive providers.	

Question 5: Should the Commission give telephone companies the option to provide online directories of telephone numbers instead of printed directories?		
Commenter	Comment	Staff Position
Collier Technologies	Yes, the Commission should allow online instead of printed directories.	Staff believes that there are a significant number of customers who rely on printed directories, and local exchange companies should continue to be obligated to provide a printed directory to customers who request one.
Century Link	The Commission should recognize that many such directories are currently available at no charge to online customers, but that there is no regulatory or market-based reason to require an online directory.	
Dex One	Yes, companies should be allowed by an explicit rule to seek an exemption.	
Frontier Communications	Yes, companies should be allowed by an explicit rule to seek an exemption.	
Public Counsel	Should the Commission decide to modify requirements for the distribution of printed White Pages directories, in either an opt-out or opt-in scenario, the Commission should require the company to provide, free of charge, alternative means to access directories which are easily accessible and available to all, such as an online directory.	
Seattle City Council	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.	
Seattle Public Utilities	Telephone companies already provide such online directories. But if the Commission formally rules that printed directories are no longer required, LECs should be required to make the information available online.	
Sightline Institute	The Commission should continue to require that print directories be made available to the small number of customers who may request them under an “opt-in” program. In addition, the Commission should require that LECs continue to provide online directories of telephone numbers for their customers who do not choose to “opt-in.”	
WITA	It should not be up to the Commission whether a company provides an online directory or not. Nor should it be a matter of whether Commission permission must be granted for an online directory to be developed and provided. If a company desires to provide an online directory, it can do so today and a rule on any such action is not needed.	
BCAW	Other than in the circumstances discussed above, the Commission should simply give companies the option to provide online directories in lieu of printed directories. In a competitive marketplace a consumer will subscribe to the company that provides a suite of services that fit the customer’s individual needs.	