



FORMERLY NORTHWEST ENVIRONMENT WATCH

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Washington Utilities and Transportation Commission  
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Re: UT-120451, White Pages Directory Rulemaking

Sightline Institute strongly supports the amendments proposed in the White Pages Directory Rulemaking, UT-120451. By limiting mandatory delivery of white pages directories only to people who request them, the state takes a more responsible approach to conserving resources and costs. The proposed rule will reduce the burden on communities of disposing of unwanted directories, and will no doubt gain the appreciation of the many state residents who do not want directories delivered to them without their approval. With the adoption of the proposed amendments, Washington will join the growing number of states who have updated their rules to reduce waste while maintaining equitable public access to the telecom system in the 21<sup>st</sup> century.

Sightline fully supports the opt-in method for directory requests. A well-designed opt-in program allows anyone to obtain directories easily and free-of-charge. We believe that access to telephone listings is important for maintaining social equity. (For more detail on how opt-in can be designed to protect social welfare please see, Eric de Place and Pam MacRae, "Is It Fair to Make Phone Books Optional?" Sightline Daily blog, June 13, 2012, <http://daily.sightline.org/2012/06/13/is-it-fair-to-make-phone-books-optional/>.)

Sightline recommends that the commission strengthen the amendments by considering the following changes:

1. To WAC 480-120-251 (3), add "The LEC may also offer a digital version of the directory, published online and offered free-of-charge to customers." This could further reduce resource use and disposal costs associated with paper directories, while still providing customers the information they want.
2. In section (3)(b)(i) of the code, change "at least one bill insert each calendar year" to "at least four bill inserts or notices each calendar year." A single insert would be too easy for customers to miss. Adding the word "notices" allows LECs to print the information directly on bills, where it may be more visible to consumers. On-bill notification is more relevant to reaching consumers who use online bill pay technologies.
3. Clarify whether the request for a paper directory must be made each time a new directory is published or whether the request lasts for a specified or an indeterminate amount of time.

4. Require LECs to report relevant data and statistics on directory requests to the commission in order to promote responsible oversight and public protection.

Thank you for the opportunity to comment on this matter. Please do not hesitate to contact Sightline Institute if we can be of service to the commission.

Sincerely,

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