

November 25, 2013

Mr. Christopher Moseng  
Public Utilities Commission  
121 Seventh Place East, suite 350  
St. Paul, MN 55101

Dear Mr. Moseng,

The Minnesota Pollution Control Agency (MPCA) is pleased to learn that the Public Utilities Commission is reviewing Minnesota Rules 7810.2900, 7811.0600 and 7812.0600 regarding the mandatory distribution of white pages directories and appreciates the opportunity for comment on PUC Docket No. P-999/R-13-459.

In 2008 the MPCA discussed the possibility of eliminating the mandate to distribute white pages directories with the Product Stewardship Institute, some state and local government entities along with the Local Search Association (formerly the Yellow Pages Association) and Association of Directory Publishers. During those conversations, the two trade associations, which at the time represented close to 90% of all directory publishers, were very open to eliminating the mandate to distribute white pages directories.

MPCA is in full support of eliminating the requirement that the white pages directories must be delivered in a paper publication. MPCA would support the proposed amendment that requires electronic directories be made available unless customers opt-in to receive a printed directory. To assure acceptance, it would be a good idea to check with small rural phone book distributors to determine if an opt-in would satisfy the majority of their community.

The Public Utilities Commission requested responses to the following questions:

1. Should the Commission establish by rule whether electronically published directories should be accessible to the public or to a limited class of persons such as customers? If so, what should the Commission require? The working draft leaves this determination to each local service provider.

The MPCA believes the business white pages directories for the larger metro areas should be accessible for the entire metro area and not just the individual communities. The MPCA believes that business customers would desire their services to be searchable by large search engines. Smaller rural communities would only need to make the directory available to their area and not necessarily searchable by large search engines. The MPCA does not have an opinion on this in regard to the residential white pages directories.

2. Should the Commission establish by rule the “default” format of directories (that is, the format of directories provided to customers who do not notify their local service provider of their preference)? If so, what should the Commission require? The working draft leaves the format determination to each local service provider for customers that do not specify a preferred format.

Yes, the PUC should establish by rule that the default directory would be electronic (not paper). However, the PUC should NOT specify how the electronic copy is provided – because technology changes too fast and this could be limiting.

3. Should the Commission’s rule distinguish between Business and Residential customers, either by requiring different default directory formats or by permitting local service providers to provide Business and Residential listings in different formats? The working draft leaves the default format determinations to each local service provider, and allows local service providers to publish some listings electronically, and others in print, if a customer does not specify a preferred format.

The PUC should not distinguish between business and residential customers. All customers should be offered the electronic directory and the opt-in choice for any paper directory.

The mission of the MPCA is to protect and improve the environment and enhance human health. There are environmental consequences of distributing printed directories that the MPCA would like to note. In 2011 there were 8,975,066 yellow and white pages directories delivered which is over 15,799,108 lbs. of books reported in Minnesota. That means that on average in 2011 each home received over 4 books and 7.5 lbs. of phone books. Although most telephone directories are made with a high percentage of post-consumer recycled content there is still a significant amount of resources that goes into the production and distribution of phone books. Using the Environmental Paper Calculator and the 2011 reported numbers for phone book directories manufacturing this much paper, even with recycled content, uses 261,476,335,438 gallons of water and creates 79,334,219,317 pounds CO2 equivalent each year as well as 58,225,006 pounds of particulates and 16,304,303 pounds of Volatile Organic Compounds (VOCs). Product Stewardship Institute has an infographic that depicts the environmental impacts very nicely <http://productstewardship.us/displaycommon.cfm?an=1&subarticlenbr=186> .

Minnesota Statute § 115A.951 prohibits telephone directories from being placed in the solid waste stream for disposal and specifies requirements for directory recyclability and collection for recycling. Despite the state ban on disposal, many of these books are not recycled. The EPA estimates that the recovery rate for telephone books was just under 37% in 2009. Several of the counties have reported that they are bearing the burden and cost of recycling telephone directories through their programs in recent years.

One final issue the MPCA would like to comment on is the issue of local emergency and government service numbers. All customers when receiving notice of the new opt-in policy should receive emergency and government phone services information on paper, to ensure that all customers, with or without internet/computer access, have this information. This would still significantly decrease the overall cost, materials, and environmental consequences of printed directories. This information would be distributed along with information on the rule changes.

Thank you very much for the opportunity to comment on the rule process. If you have any questions feel free to contact Colleen Hetzel at 651-296-6300.

Sincerely,

David J. Benke  
Division Director- Resource Management and Assistance  
Minnesota Pollution Control Agency