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December 6, 2013

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

Re: PUC Docket No. P-999/R-13-459

Dear Mr. Moseng:

The Product Stewardship Institute (PSI) is pleased to support the proposed rulemaking regarding the mandatory distribution of white pages telephone directories, as well as the detailed comments submitted by the Minnesota Pollution Control Agency.

PSI a national nonprofit organization committed to reducing the health, safety, and environmental impacts of consumer products across their lifecycles, with a strong focus on sustainable end-of-life management. We are comprised of members from 47 state environmental agencies and hundreds of local governments, and we have active partnerships with more than 95 companies, organizations, universities, and non-U.S. governments.

PSI has been active in phone book stewardship since 2006, advocating on behalf of a coalition of state and local governments to stop the delivery of unsolicited, unwanted phone books. Giving consumers the freedom to opt-in or opt-out of receiving phone books will greatly reduce the number of unwanted directories that are delivered each year. For example, between May 2011 and April 2012, the City of Seattle's mandatory opt-out program for yellow pages prevented nearly half a million phone books from being delivered on doorsteps and ultimately entering the waste and recycling streams.

While directory publishers have typically been unsupportive of mandatory opt-in or opt-out programs for yellow pages, they have been very supportive of such programs for white pages. In fact, the industry

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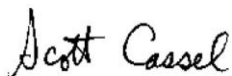
even posted a recent infographic, which promotes opt-out programs for phone books, on its White Pages blog: <http://blog.whitepages.com/2011/12/28/death-becomes-the-phone-book/>.

The fact is, telephone directories have a negative impact on both the environment and municipal budgets. For example, the environmental consequences of the nearly 9 million yellow pages and white pages directories distributed in Minnesota in 2011 (as summarized in the Minnesota Pollution Control Agency's comments) include the use of more than 260 billion gallons of water and the creation of nearly 80 billion pounds of CO<sub>2</sub> equivalent. Yet, even if all of these directories were properly collected and recycled, PSI estimates that the cost to local taxpayers in Minnesota would be nearly *half a million dollars* every year. See PSI's recently published infographic on the environmental and financial impacts of phone books, here: <http://productstewardship.us/displaycommon.cfm?an=1&subarticlenbr=186>.

With most people now relying on Internet search engines to access contact information, the mandatory distribution of phone books to all residents is no longer necessary. For those in the small minority who do still use a paper telephone directory, they can continue to receive phone books by simply opting in. Such a solution for white pages directories would be a win-win for consumers, municipal governments, and directory publishers, alike.

Thank you for the opportunity to comment on this proposed rulemaking. If you have any questions, please feel free to contact Karen Shapiro, Senior Associate for Policy and Programs, at 617-236-4866 or Karen@productstewardship.us.

Sincerely,



Scott Cassel  
Chief Executive Officer / Founder