



January 12, 2017

VIA ELECTRONIC MAIL TRANSMISSION

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

Re: Case # 17-C-_____

Dear Secretary Burgess:

Enclosed please find the Petition of Frontier Communications ("Frontier") for Additional Waiver of New York Code of Rules and Regulations, Title 16, §602.10(b) Pertaining to the Distribution of Telephone Directories.

Should you have any questions, please contact me at (518) 773-6252 or jan.vandecarr@ftr.com. Thank you.

Sincerely,

/s/ Jan VanDeCarr

Jan D. VanDeCarr
Manager, Government and External Affairs
Frontier Communications
137 Harrison Street
Gloversville, NY 12078
(518) 773-6252
jan.vandecarr@ftr.com

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Frontier Communications for
Additional Waiver of New York Code of
Rules and Regulations, Title 16, § 602.10(b)
Pertaining to the Distribution of Telephone
Directories**

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Case 17-C-_____

**PETITION OF FRONTIER COMMUNICATIONS FOR ADDITIONAL WAIVER OF
NEW YORK CODE OF RULES AND REGULATIONS, TITLE 16, § 602.10(b)
PERTAINING TO THE DISTRIBUTION OF TELEPHONE DIRECTORIES**

Frontier Telephone of Rochester, Inc., Citizens Telecommunications Company of New York, Inc., Frontier Communications of New York, Inc., Frontier Communications of Sylvan Lake, Inc., Frontier Communications of AuSable Valley, Inc., Frontier Communications of Seneca-Gorham, Inc. and Ogden Telephone Company (collectively "Frontier Communications" or "Frontier") hereby petition the Commission for an additional waiver of 16 NYCRR §602.10(b) to authorize Frontier and its directory publisher to discontinue the blanket distribution of directories to all customers. Frontier is requesting substantially the same relief requested by and granted to Verizon New York, Inc. and its directory publisher Dex Media in Case #'s 16-C-0186 and 16-C-0190, respectively.

Frontier’s request would extend the waiver granted by the NYS Public Service Commission (the “Commission”) in 2012 in Case # 12-C-0060 with respect to the distribution of Frontier’s residential white pages directories. If granted, the waiver requested in this Petition will provide Frontier with the flexibility to distribute directories in a more customer-focused and environmentally-conscious manner. More specifically, it will provide Frontier with the ability to make residential, business, and government white page directory listings (including “front-of-book” information) available to customers online at no charge or in printed form, upon request, also at no charge on a market-by-market basis. If granted, this waiver will not only produce a more finely-tuned consumer experience for Frontier customers, but it will also save approximately eleven (11) metric tons of paper per year.

Presently, the Commission’s rules (16 NYCRR § 602.10(b)) require Frontier to distribute a directory that contains both residential and business listings. In accordance with this rule and the previous waiver of the rule, Frontier currently provides all customers with printed business white page directories that include an alphabetical listing of all business customers with published numbers. These directories also include government white pages, yellow pages and consumer guide pages. These directories are published and delivered to all customers annually.

Although Frontier continues to provide printed business directories in accordance with Commission rules, technological advances in the telecommunications industry (e.g. internet directories) have made customers much less reliant on, and interested in, printed directories. In fact, as Verizon pointed out in its Petition in Case # 16-C-0186, a study conducted in 2014 by the Local Search Association found that only 6% of respondents use White Pages listings as their

primary source of listings information. Further, printed directories do not include individuals or businesses that now utilize wireless devices nor do they include listings of individuals that subscribe to cable and VoIP services through providers that no longer submit their customers' telephone numbers for inclusion in directories.

Technological advances and new customer preferences warrant a fresh look at the necessity of a requirement for printed directories, especially where providers can supply the directory information to its customers in a more desirable format. Frontier is committed to carrying out its public service responsibilities in a more environmentally-conscious manner, and this includes a more customer-focused approach to the distribution of directories. If granted, this waiver will provide Frontier with the ability to make residential, business, and government white page directory listings available to customers online *at no charge* or in printed form, *upon request, also at no charge* on a market-by-market basis. In connection with this change, and to further ensure customer satisfaction and availability of directory information, Frontier will provide the following communications when transitioning to online directories:

1. Bill message to Frontier customers;
2. Notice on Frontier's website; and
3. Frontier industry notice to competitive local exchange carriers.

In its Order in Case# 12-C-0060, the Commission found that customers have many options for locating telephone numbers and that statistics suggest that telephone directories are not nearly as valuable as they once were. Further, the Commission found that telephone books are large and cumbersome and utilize a significant amount of natural resources to produce and distribute. Frontier's request for an extension of its existing waiver will have a positive impact on the environment while simultaneously promoting business-friendly conditions that enhance the customer experience. For the reasons set forth in this Petition, Frontier respectfully requests that the Commission grant the requested waiver.

Respectfully submitted,

Jan D. VanDeCarr
Manager, Government Affairs
Frontier Communications
137 Harrison Street
Gloversville, New York 12078
(518) 773-6252
jan.vandecarr@ftr.com

Dated: January 12, 2017