

Commissioner Lee Beyer, Chairman  
Commissioner Ray Baum  
Commissioner John Savage  
c/o Phil Nyegaard, Telecommunications Manager  
Public Utility Commission of Oregon  
550 Center St SE  
Salem, OR 97310

Dear Commissioners:

The Department of Justice Informal Opinion (1988) and Blue Pages Memo (2004) clearly allow for telephone directory improvements. I hereby request that the Commission initiate rulemaking proceeding on the enclosed supplemental rule for inclusion of "Community Blue Pages" for government, school, and human services listings in telephone directories.

The revised proposed rule was prepared with review and input from many people over decades as one result of continuing telephone directory inadequacies, recent cutbacks, thousands of omissions, and changes in many telephone books statewide.

Dozens of public bodies and organizations have supported the "Community Blue Pages" concept, rulemaking, and or legislation to establish minimum standards, including the Human Services Coalition of Oregon, Oregon State Police-9-1-1, Multnomah, Clackamas, Marion, Washington and Yamhill counties, and the City of Portland.

I look forward to receiving your communications. If you have any questions or need more information, please let me know the best process for responding. Thoughtful consideration of this proposed rule will be appreciated.

Yours truly,

Jim Long  
PO Box 33  
North Plains, OR 97133

(503) 647-0021

ENCLOSURE

BEFORE THE PUBLIC UTILITY COMMISSION  
OF THE STATE OF OREGON (OPUC)

In the Matter of Rule Making	)	
Procedure Initiated by Jim Long	)	PETITION FOR
For the Inclusion of “Community	)	RULEMAKING
Blue Pages” for Government,	)	
Schools and Human Services	)	
Listings in Telephone Directories	)	

1.

The Petitioner is Jim Long, a member of the public.

2.

The petitioner, an independent Oregon social research–telecommunications–public relations consultant designed, and produced “the most comprehensive and sophisticated human services directory” (Governor Straub, 1976). The petitioner wrote to and was hired by President James Earl Carter and he completed five sole-source Federal research and development contracts regarding telephone directory improvements. The petitioner is nationally recognized as originator and advocate of the “Blue, Green, and Community Pages” concept by AT&T (the Bell System) and the U.S. Independent Telephone Association (USITA) in 1981. ‘How To’ booklets he prepared for the federal government were printed and distributed by USITA to all 1600+ telephone companies. The petitioner conceived and produced a text and color graphics database for the first interactive residential cable television programming in the northwest US. The petitioner was the first elected treasurer of the Citizens’ Utility Board of Oregon (CUB), an officer of Northwest Information and Referral Association (NIRA), chair of the Human Services Coalition of Washington County (1993), and an executive committee member for the Washington County Commission for Services to Children and Families. The petitioner was hired by CUB to represent Oregon consumers before the OPUC regarding “Caller ID” and CLASS services. The petitioner has written and had published many directories, databases, and books.

3.

Historically, the yellow pages classification system has proven to be inappropriate for government and human services, causing omissions. These omissions amount to misrepresentation by telecommunications utilities, because the issue remains that many public and non-profit agencies and organizations are paying for a service they do not and cannot receive. There is no standard format required for telephone listings of human service agencies that are currently published by or through a telecommunications utility. Thousands of errors, omissions, inconsistencies, and inadequacies exist in current editions of telephone directories in most parts of Oregon. As a result, if a person in need doesn’t know the name of an agency, she or he probably won’t be able to find it listed alphabetically, and if it is not classified, it will be even more difficult to locate. This effects the quality of service for consumers.

The 1988 Informal Opinion from the Dept. of Justice stated, “. . . yes, the PUC has the authority to adopt and enforce rules on the content and placement of government and human services in telephone directories published by public utilities.” The 2004 Department of Justice Blue Pages Memo further clarifies the commission’s broad authority.

It is not clear that whether costs generated by this petition will be in excess of whatever costs to the local exchange carriers exist presently. If it is, it is not proven that the costs are not already defrayed by existing payments of business telephone customers. If there is some increased cost, it is surely not clear that the cost should not be borne by the company as part of its public service obligations.

4.

The publication of a Government and Human Service Guide in phone directories will more readily and efficiently identify public (tax-supported) and private non-profit agencies which offer necessary, essential and life-saving services to members of the public. Standardization of this format will provide a familiar and convenient base of information for access by all members of the public, and it will help government be more efficient and effective. The rule will help in ensuring that subscriber list information is made available under non-discriminatory and reasonable rates, terms, and conditions.

5.

The petitioner requests the adoption of the following rule:

- 1) Each telecommunications public utility that publishes, sells its customer/subscriber database, or authorizes for publication/electronic distribution any database or directory listing telephone names and addresses of its subscribers shall consolidate listings in that directory of the telephone numbers and addresses for all government and human service agencies in an easy-to-find blue-bordered portion of the directory separate from the white and yellow pages listings.

This “Community Blue Pages” section shall include:

- a) alphabetical listings of City, County, State, Regional, and Federal Government offices, tribal governments, port authorities, public schools and districts, special service districts,
- b) classified listings in a Government and Human Service Guide to help consumers access the above alphabetical listings, and
- c) community information pages (Zip Codes, maps, public transit, etc.)

- 2) Each telecommunications public utility will compile alphabetical listings of all government offices (City, County, State, Federal, Ports, Regional, Tribal), special service districts, and public schools (by name with addresses and telephone numbers) under those headings and consolidated in one blue section by the telecommunications public utility for publication separate from and *after/before* the Government and Human Service Guide in the Community “Blue Pages“ section.
- 3) “Human Service Agency” includes the following business telephone customers per directory coverage area:
  - a) all public government offices including but not limited to municipal, county, regional, state, federal, tribal, special services districts, ports, post offices, and publicly elected officials of such agencies;
  - b) all public schools and libraries, including school district offices and departments thereof;
  - c) all private non-profit corporations that provide direct services to citizens,
  - d) all 24 hour, 7-days/week emergency services not otherwise available through a 9-1-1 listing,
  - e) N-1-1 telecommunications services (e.g. 9-1-1, 7-1-1, 5-1-1, 3-1-1, 2-1-1); and
  - f) special utility programs (e.g. power outage response, low-income energy assistance program, Oregon telephone assistance program).
- 4) The Government and Human Services Guide shall be compiled and updated annually and printed and distributed in the directory/database.

4A *Preferred Option A (by the advisory group and telecommunications utility)*

The PUC and each telecommunications public utility shall appoint a local advisory group.

The advisory group shall compile appropriate classified listings for all human services agencies in the area covered by that telecommunications utility’s directory, and other service providers outside that area as deemed essential (e.g. toll-free numbers e.g., AIDS hotlines, MEDICARE, N11, 2-1-1, 5-1-1, Oregon Legislature, School Safety Hotline, etc).

The advisory group will submit to telecommunications utility updates of names and addresses and telephone listings of government offices, schools, and human services agencies for inclusion in the Government and Human Services Guide three months before annual directory publication, and/or

4B *Second Option B (by the telecommunications utility)*

Because the telecommunications utilities have the duty to provide classified listings and capability to process them for print and electronic distribution, the commission may deem it more efficient and in the public interest for telecommunications utilities to do the compilation.

Every “human service agency” that is a business telephone customer may choose a heading from the current Blue Pages Headings Book. These heading requests will be processed by a representative of the telecommunications utility similar to the procedures used for classified Yellow Pages headings.

The telecommunications utility will submit for review and update by the advisory group the names and addresses and current telephone listings of government offices, schools, and human services agencies for inclusion in the Government and Human Services Guide three months before directory publication.

The Government and Human Services Guide shall classify entries by the nature of the problems met. Multi-service agencies can be listed under more than one classification. Subjective service descriptions may be used when appropriate. All or some of the human service listings may be provided bi-lingually as determined by the advisory group. Cross-references should be used whenever relevant. Telephone listings will appear in the guide with approval of the customer.

- 5) A natural progression from the inside front cover or page one Emergency Telephone System listing is the Emergency Services Box within and prior to the Government and Human Services Guide. All 24-hour, 7 days/week, 366 days/year emergency resources shall be listed in the Emergency Services Box. The Emergency Services Box listings shall include 9-1-1 and other N-1-1 services, police, fire, poison control, child abuse victim resources, elder abuse victim resources, domestic violence victim resources, rape victim resources, suicide and mental health counseling, and power outage response.
- 6) The size of the print of the Government and Human Services Guide shall be at least eleven point (11 point) type, with services specifically for seniors and disabled persons at least fourteen point (14 point) type.
- 7) The alphabetical government offices and schools listings shall be placed after the Customer Guide. In directory areas in which separate white and yellow pages directories are published (and bound separately), the blue-bordered alphabetical listings and the Government and Human Services Guide classified listings shall be included near the front of both directories.
- 9) The “Community Information Pages” section shall have easy-to-find blue or green colored borders.
- 10) There shall be no additional costs to the human service agencies for inclusion of telephone numbers and addresses in the Government and Human Services Guide.
- 11) A disclaimer at the end of the “Government and Human Services Guide” will credit the advisory group and release the compiling group and directory publisher/s from errors that may be published.

- 12) The following privacy education box will be on the first page of the “Government and Human Services Guide.”

If you do not want anyone you call to automatically know your telephone number, dial \*67 or 1167 (rotary) before each call, or ask the “O” Operator about line blocking. Calls to the 911 Emergency number are not blockable.  
See page # \_\_\_ for additional instructions regarding this Caller ID blocking service.

- 13) Though the “telephone directory” is primarily for listing telephone numbers, the blue/green bordered section of the “telephone directory” may also include other Community Information Pages of general use and interest to inform consumers (as suggested by the advisory group or PUC), such as statewide zip codes, maps, public transit routes, energy conservation tips, street guides, elected officials, disaster preparedness and evacuation routes, homeland security, history, points of interest, tide tables, and internet Universal Resource Locators (URLs).
- 14) The local exchange carrier will make available the Blue Pages telephone listings together with alphabetical White Pages and classified Yellow Pages listings under non-discriminatory and reasonable rates, terms, and conditions.

6.

The parties who are interested in this rule include all telecommunications utilities, those who purchase the telephone number database for hardcopy print and/or electronic directory publication, all government offices, public schools, “human service agencies,” consumers, ratepayers, and directory users.

Similar petition originally submitted December, 1987  
Petition resubmitted the 20<sup>th</sup> day of August, 2003.  
Supplemental petition draft, the 30<sup>th</sup> day of August, 2004  
Second Supplemental discussion draft, the 19<sup>th</sup> day of January, 2005

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