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*enhancing the quality  
of neighborhoods  
through community  
participation*

Administrative Law Judge Allan Arlow  
Rules Coordinator Diane Davis  
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Salem OR 97301-2551

Administrative Law Judge Arlow:

I am submitting this written comment regarding the rulemaking docket number AR464 as an interested party in improving the quality of the Blue Pages phone directories. I am the Supervisor for the City of Portland and Multnomah County's Information and Referral Program, 503-823-4000, and have a great deal of experience in helping community members access services.

The City/County Information and Referral Program serves the City of Portland and Multnomah County in the capacity of helping community members locate government-related and social services information to meet their needs. We are open 8am to 5pm, Monday through Friday, and answer approximately 15,000 calls each month. We maintain an electronic database of about 1200 service records and about 12,000 employee records.

In our work with the public we run across a lot of community members who indicate to us that they are calling us because we are the main City/County number listed in the phone book and that they first tried to find the specific department number they needed but were unable. Many individuals like to be self-sufficient in their quests for information and I believe one of the goals of information sharing should be to give individuals as many ways as possible to access the information they need. Some individuals like to use the phone, some like to use the internet and some like to look things up in their phone book. I believe that the Blue Pages are a vital part of this information sharing and making services as accessible to as many community members as possible. I also believe that the Blue Pages are a big selling point for the companies that produce the directories and that making them as good a tool as possible should be in the interests of these companies. Given that everyone (service providers, users and the directory producers themselves) should benefit from improving the Blue Pages tool I believe that strong consideration should be given to standardizing the Blue Pages to ensure accuracy, consistency and better ease of use.

The number one complaint that we hear from Blue Page users who call the City/County Information and Referral Line is that they do not know which entity provides a particular service. For example, they want to get a copy of a birth certificate but they don't know if it is the City, County, State, etc. The Blue Pages are currently organized by branch of the government so if someone doesn't know which branch the service falls under they have to browse each section one at a time. My primary suggestion to improve the Blue Pages is to either organize listings by service or provide an index by services. This would not have to necessitate increasing the length of the Blue Pages as I also believe that in most Blue Pages I have seen the listings are unnecessarily long. In my opinion they would be much easier to use if they were condensed to list the most frequently requested services and then more prominently list some of the main numbers rather than a long list of numbers that are rarely requested.

Another suggestion along the same lines of making basic access to services easier for users is to prominently list some of the main Website addresses. Many local governments and social services have

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**Information & Referral  
Center**  
503-823-4000

**Crime Prevention  
Center**  
503-823-4519

**Neighborhood Support  
Center**  
503-823-7306 Inspections  
503-823-7350 Noise Office

**Neighborhood Resource  
Center**  
503-823-4519

tremendous information databases and resources available online for users to look up information. More and more people are choosing this as their preferred way of finding information so putting a few of these main Website addresses in the Blue Page listings would help to guide individuals seeking information in this manner.

Most of the local phone books in the Portland Metro area do not have a "Community" or "Social Services" section in the front of the phone book. I believe that this is needed and would be a tremendous resource for our community. I don't believe that this listing needs to be very long. In the Portland Metro Area we have a tremendous resource, 211Info, which provides information and referral to hundreds of different social service agencies in our community. A "Social Services" section in the front of the phone book could prominently list their number as well as several of the larger nonprofit social service providers in the area. I believe that this type of information should also be listed by service or else have an index of services.

The very front of the phone book very prominently lists the emergency number 911. I would suggest that page one should in addition list the main numbers for accessing both government services and social services. In the Portland Metro area phone book for example it would be most effective to list 911 as the emergency line, 503-823-3333 as the non-emergency Police and Fire line, then 503-823-4000 as the government services line and 211 as the social services line.

Finally, I would suggest that the most important recommendation I could make would be to find a way to ensure that the phone directory publishing companies work together with the local information and referral service providers when putting together the government and social services listings. In the Portland Metro area it would be very practical for the directory publishing companies to coordinate with both City/County Information and Referral and 211Info to ensure the accuracy of the information provided in these publications. It seems to me that this would be in their best interest to put out a better product. I do not know how they presently update information but we continue to see inaccuracies in the listings. A couple of recent examples; the other day I had a caller who said that the number in her Qwest Dex directory for Multnomah County Elections was listed as 503-248-3720. I checked my Qwest Dex directory that I just received last month and indeed it listed this number as 503-248-3720 on page 31. That number was changed 5 years ago to 503-988-3720. Another example is that the information for our program on page 35 is wrong. The address, phone and fax are all wrong. The method this particular publication is using is not working so why not take advantage of using a resource such as our program and the 211Info program to supply them with current, accurate information. There would probably need to be some compensation to the service providers for this work but I do not think it would need to be very much as the gathering of most of this data is already part of each programs daily operations.

In summary, I believe that standardizing and improving the Blue Pages tool makes sense. The process of establishing these standards and establishing the relationships between the local service providers and the directory publishing companies may present some initial challenges but will be well worth it in the long run to all parties. The publishers will put out a better more competitive product, the local service providers will be able to rely on the Blue Pages on a public information tool and most importantly the users in the community will be able to find the information they need more easily.

Please do not hesitate to contact me if I can be of any further assistance in this process.

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