



August 18, 2015

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Barnes Johnson, Director
Office of Resource Conservation and Recovery
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 5301P
Washington, DC 20460

Dear Director Johnson:

I am writing to request that US EPA calculate telephone directory generation and recovery independently of newspapers and mechanical papers in its municipal solid waste characterization reports, as was EPA's practice prior to 2010. Inadvertantly, by folding phone books into a broader category that is recycled at a much higher rate, EPA has provided the perfect screen behind which directory publishers are hiding their poor sustainability performance.

In *Municipal Solid Waste in the United States: 2009 Facts and Figures*, EPA documented a 36.9% recovery rate for telephone directories. Since 2010, EPA has stopped conducting a separate analysis for phone books and, instead, included phone books in the "newspapers/mechanical papers" category. In the 2011 report, EPA documented a 72.5% recovery rate for this combined category. It documented a 70.0% recovery rate in 2012 and 67.0% recovery rate in 2013.

In 2014, the Local Search Association (LSA), which represents phone book publishers, cited data from EPA's 2012 report to claim the following in the industry's Sustainability Report:

Total paper recovered for recycling was 65% in 2012. However, newspaper and mechanical papers, the group that includes telephone directories, was recycled at 70%! Yellow Pages are recycled at one of the highest rates of any material in the country.

Last week, LSA issued a new infographic (enclosed) that touts the 67% recovery rate for newspapers and mechanical papers, including directories, comparing this rate to the much lower US average of 34% recovery for all products.

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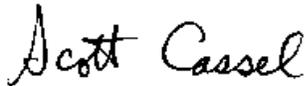
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Over the past nine years, our organization, which is comprised of 47 state governments and hundreds of local government agencies, has prodded the phone book industry to increase its sustainable practices. Despite the natural decline in print directory use, the industry continues to produce and distribute them in large quantities, at a cost of \$60 million each year to local governments across the country. These books are often a huge waste of resources since many people don't want them and, despite widespread distribution, the industry does not help fund the infrastructure to recycle them. PSI recently released the enclosed 2015 Report Card that evaluates the industry's phone book sustainability practices across a variety of indicators, including recycling.

Our organization has been successful at using a data-driven approach to advance resource recovery and product stewardship policies. In 2008, PSI brought national attention to the issue of phone book sustainability, engaging industry stakeholders in a dialogue that led yellow pages trade groups to implement an opt-out system and sign a sustainability platform. Data from EPA is fundamental to conducting an effective analysis of the progress of phone book recycling, which will, in turn, advance efforts to increase recovery. To assist governments in this effort, please resume documenting the recovery of telephone directories independently of other paper products.

Thank you for your consideration of this request, and for EPA's diligence in calculating municipal solid waste generation and recovery. Please do not hesitate to contact me if you have any further questions, at (617) 236-4822 or Scott@productstewardship.us.

Sincerely,

A handwritten signature in black ink that reads "Scott Cassel". The signature is written in a cursive, slightly slanted style.

Scott Cassel
CEO/Founder