

T

ORIGINAL FILE COPY

E. Barlow Keener  
Attorney

**Southern Bell**

c/o Marshall M. Omsar  
Suite 400  
150 So. Monroe Street  
Tallahassee, FL 32301  
Phone (305) 530-5558

October 26, 1990

Mr. Steve Tribble  
Director, Division of Records & Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: FPSC Docket No. 891194-TL

Dear Mr. Tribble:

Enclosed please find the original and 15 copies of the Rebuttal Testimony of Nancy H. Sims on behalf of Southern Bell Telephone and Telegraph Company in the above-referenced docket. All parties of record have been served in accordance with the attached Certificate of Service.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy of the letter to me.

Very truly yours,

*E. Barlow Keener*  
E. Barlow Keener

ACK

APA

APF

ATF

ATW

CTF

DTF

ETF

FTF

6 Enclosures

CGE H. R. Anthony

ROM A. M. Lombardo

SEC R. D. Lackey

WAS

JTH

RECEIVED

*[Signature]*

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER 1000

A BELL SOUTH Company 09678 OCT 26 1990

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE  
Docket No. 891194-TL

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 26th day of October, 1990  
to:

Walter D'Haeseleer  
Division of Communications  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0866

Angela Greene  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

Jack Shreve  
Public Counsel  
Office of the Public Counsel  
111 W. Madison Street  
Room #12  
Tallahassee, FL 32399-1400

John E. Thrasher, Esq.  
Jeffrey L. Cohen, Esq.  
Florida Medical Association  
Post Office Box 2411  
Jacksonville, Florida 32203

Willis Booth, Director  
Florida Police Chiefs  
Association  
Post Office Box 14038  
Tallahassee, Florida 32317-4038

Thomas R. Parker, Esq.  
OTE Florida Incorporated  
Post Office Box, 110 MC 7  
Tampa, Florida 33601-0110

Cheryl Phoenix, Director  
Florida Coalition Against  
Domestic Violence  
Post Office Box 532041  
Orlando, FL 32853-2041

Michael R. Ramage  
Deputy General Counsel  
FL Dept. of Law Enforcement  
Post office Box 1489  
Tallahassee, Florida 32302

Robert A. Butterworth  
Attorney General  
Dept. of Legal Affairs  
The Capitol  
Tallahassee, FL 32399-1050

Stephen S. Mathues  
Dept. of General Services  
Koger Executive Center  
2737 Centerview Drive  
Knight Bldg.-Suite 309  
Tallahassee, Florida 32399

Pete Antonacci  
Statewide Prosecutor  
Dept. of Legal Affairs  
The Capitol, Plaza 01  
Tallahassee, FL 32399-1050

Alan N. Berg  
Senior Attorney  
United Telephone Co. of FL  
Post Office Box 5000  
Altamonte Spgs, FL 32716

Department of Legal Affairs  
Richard E. Doran  
Director, Criminal Appeals  
The Capitol  
Tallahassee, FL 32399-1050

*E. Barlow Keenan*

1 SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

2 REBUTTAL TESTIMONY OF NANCY H. SIMS

3 FLORIDA PUBLIC SERVICE COMMISSION

4 DOCKET NO. 891194-TI

5 OCTOBER 26, 1990

6

7

8

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

9

10

A. I AM NANCY H. SIMS. MY BUSINESS ADDRESS IS 575

11

WEST PEACHTREE STREET, ATLANTA, GEORGIA 30375.

12

13

Q. ARE YOU THE SAME NANCY H. SIMS THAT PREFILED

14

DIRECT TESTIMONY IN THIS DOCKET?

15

16

A. YES, I AM.

17

18

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

19

20

A. THE PURPOSE OF MY TESTIMONY IS TO ADDRESS

21

SEVERAL OF THE CONCERNS ABOUT CALLER ID THAT

22

HAVE BEEN PRESENTED IN THE PREFILED TESTIMONY

23

OF THE LAW ENFORCEMENT, PUBLIC COUNSEL AND

24

DOMESTIC VIOLENCE AGENCY WITNESSES. MORE

25

SPECIFICALLY, I WILL DISCUSS THE ISSUES OF

1 BLOCKING THE CALLING NUMBER FROM BEING  
2 DELIVERED, PROVIDING CALL TRACING ON A PER CALL  
3 BASIS, AND DEALING WITH THE ADVANCEMENT IN  
4 TECHNOLOGY REPRESENTED BY CALLER ID.

5  
6 Q. BASED ON THE PREFILED TESTIMONY IN THIS DOCKET,  
7 WHAT IS THE PREVALENT THEME WHEN THE NEED FOR  
8 BLOCKING CALLING NUMBER DELIVERY IS DISCUSSED?

9  
10 A. OTHER THAN THE MORE GENERALIZED, SPECULATIVE  
11 EXAMPLES GIVEN IN DR. COOPER'S TESTIMONY, THE  
12 OVERWHELMING STATED REASON FOR WANTING THE  
13 CAPABILITY TO BLOCK CALLING NUMBER DELIVERY IS  
14 FOR SAFETY AND SECURITY. CERTAIN PARTIES, SUCH  
15 AS THE LAW ENFORCEMENT AGENCIES, CRISIS  
16 INTERVENTION AGENCIES, AND SOME HELP LINES ARE  
17 SPECIAL GROUPS THAT HAVE SPECIAL NEEDS AND  
18 VALID REASONS FOR SPECIAL TREATMENT. SOUTHERN  
19 BELL AGREES THAT THE EMPLOYEES, VOLUNTEERS AND  
20 CLIENTS OF THESE GROUPS SHOULD BE AFFORDED  
21 BLOCKING OPTIONS TO PROVIDE THEM WITH ANONYMITY  
22 FOR SAFETY AND SECURITY REASONS.

23  
24 AS STATED IN MY DIRECT TESTIMONY, SOUTHERN BELL  
25 HAS OFFERED A MULTITUDE OF OPTIONS FOR USE BY

1           THESE GROUPS, ANY ONE OF WHICH WILL AFFORD THEM  
2           THE ANONYMITY THEY DESIRE. IN ADDITION, THESE  
3           OPTIONS ARE NOT DIFFICULT TO USE AND THEY ARE  
4           TO BE OFFERED FREE OF CHARGE.  
5

6           Q.    COULD YOU ADDRESS SOME OF THE CONCERNS  
7           EXPRESSED BY THE FLORIDA COALITION AGAINST  
8           DOMESTIC VIOLENCE AND THE CENTER AGAINST SPOUSE  
9           ABUSE?  
10

11          A.    YES. THE FEAR EXPERIENCED BY ABUSED SPOUSES  
12           AND CHILDREN DESCRIBED BY MS. BROWN, MS. DUNN,  
13           AND MS. PHOENIX IS CERTAINLY REAL AND THEIR  
14           SAFETY SHOULD NOT BE COMPROMISED. THEREFORE,  
15           THE SAFE HOMES AND THE SHELTERS WILL BE  
16           AFFORDED ACCESS TO FREE BLOCKING OF CALLING  
17           NUMBER DELIVERY. THE VOLUNTEERS OF THE  
18           AGENCIES WILL ALSO HAVE FREE BLOCKING  
19           AVAILABLE, AS WILL THE VICTIMS ON WHOSE BEHALF  
20           A REQUEST FOR BLOCKING IS MADE BY THE AGENCY.  
21           IN NEW JERSEY, WHERE CALLER ID HAS BEEN IN  
22           EFFECT FOR ALMOST THREE YEARS, SHELTERS USE PAY  
23           TELEPHONES FOR OUTGOING CALLS TO PROTECT THEIR  
24           CLIENTS. IN ADDITION, THE INCOMING LINES ARE  
25           PROVISIONED WITH CALLER ID IN ORDER TO IDENTIFY

1 THE NUMBER OF THE PERSON, PERHAPS AN ABUSER,  
2 WHO IS CALLING THE SHELTER.

3  
4 MS. DUNN'S CONCERN THAT SOUTHERN BELL WILL BE  
5 ASSUMING THE RESPONSIBILITY FOR "SCREENING  
6 VICTIMS FOR ELIGIBILITY FOR A CALL BLOCK  
7 SERVICE" IS MISPLACED. SOUTHERN BELL HAS NOT  
8 PROPOSED TO DO THIS TYPE OF SCREENING NOR WILL  
9 IT REQUIRE THE VICTIM TO BE EMBARRASSED BY  
10 HAVING TO REVEAL PERSONAL EXPERIENCES IN ORDER  
11 TO RECEIVE FREE CALL BLOCKING. WE BELIEVE THE  
12 AGENCIES ARE QUALIFIED TO MAKE THIS  
13 DETERMINATION, AND SOUTHERN BELL WOULD HAVE A  
14 PERSON DESIGNATED IN ITS CUSTOMER ASSISTANCE  
15 BUREAU TO RECEIVE ORDERS FROM THESE AGENCIES.  
16 THIS ARRANGEMENT WILL HELP KEEP ANY  
17 ADMINISTRATIVE COSTS TO A MINIMUM. FINALLY,  
18 THE FREE BLOCKING BEING PROPOSED WOULD NOT  
19 INHIBIT THE AVAILABILITY OF 911 SERVICES FROM  
20 THESE LINES.

21  
22 Q. HOW WOULD YOU ADDRESS THE SITUATION DESCRIBED  
23 BY MS. BROWN WHERE A VICTIM OF ABUSE SEEKS  
24 REFUGE AT A FRIEND'S HOUSE AND HAS A NEED TO  
25 CALL HOME?

1           A.    CALLER ID SERVICE IS AN OPTIONAL SERVICE WHICH  
2                    IS SUBSCRIBED TO BY THE CUSTOMER AND WHICH  
3                    REQUIRES THE PURCHASE OF A DISPLAY DEVICE.

4  
5                    THE VICTIM WHO SEEKS SHELTER WITH A FRIEND OR  
6                    FAMILY MEMBER WILL KNOW BEFORE SHE MAKES THE  
7                    CALL BACK TO HER HOME IF CALLER ID IS INDEED  
8                    WORKING ON HER HOME NUMBER. IF IT IS NOT, THEN  
9                    CALLER ID WILL NOT BE A FACTOR. IF IT IS, OR  
10                   IF SHE IS UNCERTAIN WHETHER IT HAS BEEN ADDED  
11                   IN HER ABSENCE, THEN THE VICTIM COULD USE THE  
12                   OPERATOR IN PLACING THE CALL.

13  
14           Q.    DO YOU AGREE THAT LAW ENFORCEMENT AGENCIES HAVE  
15                    UNIQUE NEEDS THAT PER CALL OR PER LINE BLOCKING  
16                    MAY NOT ADEQUATELY ADDRESS?

17  
18           A.    YES. AS STATED IN MR. RADIN'S TESTIMONY FOR  
19                    GTE TELEPHONE, IN CERTAIN SITUATIONS, LAW  
20                    ENFORCEMENT MAY HAVE NEED OF MAINTAINING THE  
21                    ABILITY TO APPEAR AS ANY OTHER CALLER. FOR  
22                    INSTANCE, WITH PER CALL OR PER LINE BLOCKING, A  
23                    "P" WILL BE DISPLAYED WHICH WOULD INDICATE TO A  
24                    CALLER ID SUBSCRIBER THAT THE CALLING NUMBER  
25                    IS BEING BLOCKED. SOUTHERN BELL AGREES WITH

1 GTE THAT BY GIVING LAW ENFORCEMENT THE ABILITY  
2 TO PASS A "SAFE" NUMBER AT WILL, THEIR NEEDS  
3 SHOULD BE RESOLVED.

4  
5 OTHERS, SUCH AS INFORMANTS WHO HAVE AN  
6 OCCASIONAL NEED TO PROTECT THEIR NUMBER, CAN  
7 USE THE OTHER READILY AVAILABLE ALTERNATIVES  
8 DESCRIBED IN MY DIRECT TESTIMONY.

9  
10 Q. WOULD YOU PLEASE COMMENT ON THE PORTIONS OF MR.  
11 TUDOR'S TESTIMONY THAT REFER TO THE EFFECTS  
12 THAT ADVANCEMENTS IN TECHNOLOGY HAVE HAD ON LAW  
13 ENFORCEMENT?

14  
15 A. MR. TUDOR'S TESTIMONY EMPHASIZES HOW LAW  
16 ENFORCEMENT IN GENERAL HAS OVER THE YEARS HAD  
17 TO ADJUST THE WAY IN WHICH IT OPERATES TO MEET  
18 THE CHANGES BROUGHT ON BY NEW TECHNOLOGIES. IN  
19 PARTICULAR, HE MENTIONS PAGING AND CELLULAR  
20 SERVICES WHICH HAVE BEEN USED HEAVILY IN  
21 CRIMINAL ACTIVITIES.

22  
23 I DO NOT CONDONE THIS USE OF SUCH SERVICES, BUT  
24 I AM SURE THAT MR. TUDOR DOES NOT PROPOSE THAT  
25 SUCH SERVICES SHOULD NEVER HAVE BEEN OFFERED OR



1 ONLY PROVIDED UNDER VERY RESTRICTIVE RULES. I  
2 AM ALSO SURE THAT HE WOULD ADMIT THAT CELLULAR  
3 AND PAGING SERVICES PROVIDE GREAT BENEFIT TO  
4 THE PUBLIC AT LARGE AS WELL AS ASSISTANCE TO  
5 LAW ENFORCEMENT.  
6  
7 ADVANCEMENTS IN TELECOMMUNICATIONS SERVICES ARE  
8 OFFERED TO SERVE THE GENERAL PUBLIC'S INTEREST.  
9 IN SO DOING, THEY ALSO HELP LAW ENFORCEMENT.  
10 MR. TUDOR HAS ONLY EMPHASIZED THE PROBLEMS THAT  
11 MAY OCCUR WITH THE DELIVERY OF THE CALLING  
12 NUMBER, WHICH SOUTHERN BELL HAS ADDRESSED  
13 THROUGH VARIOUS BLOCKING OPTIONS. HE HAS  
14 IGNORED THE VOLUMINOUS TESTIMONY THAT SAYS  
15 CALLER ID WILL ENHANCE EMERGENCY OPERATIONS AND  
16 WILL REDUCE AS WELL AS ASSIST INVESTIGATIONS  
17 INTO BOMB THREATS, HARASSING AND THREATENING  
18 CALLS AND FALSE AS WELL AS ACTUAL FIRE CALLS.  
19  
20 NOTING THE EXCEPTIONS FOR SECURITY AND SAFETY,  
21 CALLER ID SERVICE SHOULD BE IMPLEMENTED WITHOUT  
22 PER CALL OR PER LINE BLOCKING IN ORDER FOR THE  
23 SERVICE TO BE USED IN THE MANNER IN WHICH IT  
24 WAS INTENDED. THE GENERAL OFFERING OF BLOCKING  
25 COULD NOT ONLY HAMPER THE USE OF THE SERVICE IN

1 EMERGENCY SITUATIONS, BUT COULD DEVALUE THE  
2 LONG-TERM VIABILITY OF THE SERVICE.

3

4 Q. DO YOU AGREE WITH DR. COOPER'S BELIEF THAT WITH  
5 CALLER ID THE CALLER ACTUALLY LOSES CONTROL  
6 OVER HIS TELEPHONE NUMBER?

7

8 A. NO. THE CALLER HAS THE ABILITY TO CHOOSE TO  
9 MAKE A CALL OR TO NOT MAKE A CALL. THE CALLER  
10 CAN CHOOSE WHO THEY WANT TO CALL AND WHEN THEY  
11 WANT TO CALL. THE CALLER CAN ALSO CHOOSE THE  
12 CALLING LOCATION AND THE METHOD BY WHICH THE  
13 CALL IS MADE. WITH CALLER ID, THE CALLER MAY  
14 GIVE MORE CONSIDERATION TO THE MANNER IN WHICH  
15 THE CALL IS PLACED, BUT WITH CALL TRACING AND  
16 CALL RETURN NOW IN PLACE, THE CALLER PROBABLY  
17 DOES THIS TO SOME DEGREE TODAY.

18

19 EVEN THE CUSTOMER WITH A NONPUBLISHED NUMBER IS  
20 PROTECTED WITH THE IMPLEMENTATION OF CALLER ID.  
21 HIS NUMBER WILL NOT BE DISPLAYED UNLESS: 1) HE  
22 INITIATES A CALL, AND 2) THE CALLING PARTY HAS  
23 SUBSCRIBED TO CALLER ID. BECAUSE OF THE  
24 NONPUBLISHED STATUS OF THE NUMBER, IF THE  
25 NUMBER IS DISPLAYED THROUGH CALLER ID SERVICE,

1 IT CANNOT BE ASSOCIATED WITH AN ADDRESS. IF  
2 THE CALLER IS CONCERNED ABOUT AN UNWANTED  
3 CALLBACK, HE CAN INITIATE INCOMING CALL  
4 BLOCKING. FURTHERMORE, THE CUSTOMER WITH A  
5 NONPUBLISHED NUMBER IS USUALLY MORE CONCERNED  
6 ABOUT KNOWING WHO IS CALLING, AND CALLER ID  
7 WITHOUT BLOCKING CAN GIVE HIM THAT CONTROL  
8 MECHANISM.

9  
10 Q. IN DR. COOPER'S TESTIMONY AT PAGES 28 AND 29,  
11 HE DISCUSSES THE OPTIONS FOR HANDLING ANNOYANCE  
12 CALLS. IS CALLER ID BEING PROPOSED AS THE  
13 ANSWER TO PREVENTING ANNOYANCE CALLS?

14  
15 A. CALLER ID IS NOT BEING PROPOSED BY SOUTHERN  
16 BELL AS THE ULTIMATE SOLUTION TO THE ANNOYANCE  
17 CALL PROBLEM. IT IS, HOWEVER, A USEFUL  
18 DETERRENT, ESPECIALLY WHEN COUPLED WITH OTHER  
19 SOUTHERN BELL TOUCHSTAR FEATURES. FOR  
20 INSTANCE, CALLER ID CAN BE USED TO SCREEN  
21 INCOMING CALLS AND, IN CONJUNCTION WITH  
22 INCOMING CALL BLOCKING, CAN BE USED TO PREVENT  
23 THE RECURRENCE OF AN UNWANTED CALL.

24  
25 WHILE SOUTHERN BELL ESTIMATES THAT THERE ARE

1           APPROXIMATELY 75,000,000 CALLS MADE IN SOUTHERN  
2           BELL TERRITORY WITHIN THE STATE OF FLORIDA EACH  
3           DAY, HARASSING AND ANNOYING CALLS CONSTITUTE  
4           ONLY A TINY FRACTION OF THOSE CALLS.

5           THEREFORE, FOCUSING ON CALLER ID AS A SERVICE  
6           DIRECTED AT HANDLING ANNOYANCE CALLS DISREGARDS  
7           THE MORE IMPORTANT REASONS FOR OFFERING THIS  
8           SERVICE.

9  
10          CUSTOMERS HAVE INDICATED THAT THEY LIKE TO SEE  
11          THE NUMBER OF THE PERSON CALLING THEM AS THEY  
12          MAY THEN BE ABLE TO IDENTIFY THE CALLER BEFORE  
13          ANSWERING THE CALL.   BASED ON THE CALLING  
14          NUMBER THEY CAN THEN MAKE AN INFORMED DECISION  
15          AS TO HOW TO ANSWER THE CALL OR WHETHER OR NOT  
16          TO ANSWER THE CALL AT ALL.   IN FACT, WHEREAS  
17          SOME OF THE OPPOSITION TESTIMONY SAYS THAT  
18          CALLER ID COMPROMISES SECURITY AND SAFETY, MANY  
19          OTHERS PRAISE THE SERVICE AS AN ENHANCEMENT TO  
20          SAFETY AND SECURITY.   ALSO, AS DESCRIBED AT  
21          LENGTH IN MY DIRECT TESTIMONY, THERE ARE  
22          NUMEROUS USES FOR CALLER ID SERVICE, SUCH AS  
23          PROVIDING ADDITIONAL INFORMATION FOR EMERGENCY  
24          SERVICES PROVIDERS, ASSISTING DEAF CUSTOMERS TO  
25          DETERMINE IF THEY SHOULD ANSWER THEIR PHONE

1 WITH A TELECOMMUNICATIONS DEVICE FOR DEAF  
2 PERSONS, AND PROVIDING SMALL BUSINESSES WITH  
3 THE ABILITY TO PERSONALIZE SERVICE, THAT ARE  
4 TOTALLY UNRELATED TO THE UNWANTED CALL ISSUE.  
5 THESE USES ARE IN THE GENERAL PUBLIC'S INTEREST  
6 AND SHOULD NOT BE IGNORED.

7  
8 DR. COOPER AND OTHERS WOULD LEAD ONE TO BELIEVE  
9 THAT SERVICES SUCH AS CALL TRACING, CALL RETURN  
10 AND INCOMING CALL BLOCK CAN SERVE THE SAME  
11 NEEDS OF THE CUSTOMER AS DOES CALLER ID.  
12 SOUTHERN BELL DOES NOT AGREE. EACH SERVICE  
13 BRINGS A UNIQUE SET OF BENEFITS TO THE  
14 CUSTOMER. WHILE THERE ARE SOME CROSS  
15 ELASTICITIES AMONG THE SERVICES, CUSTOMERS HAVE  
16 VARYING NEEDS AND EACH TOUCHSTAR FEATURE  
17 PERFORMS A SPECIAL, UNIQUE SERVICE WHICH MAY OR  
18 MAY NOT SATISFY AN INDIVIDUAL CUSTOMER'S NEEDS.  
19 THESE SERVICES ARE DESIGNED TO ALLOW CUSTOMERS,  
20 BOTH CALLER AND CALLING PARTY, TO TAILOR THEIR  
21 TELEPHONE SERVICE TO BETTER SERVE THEIR  
22 PERSONAL AS WELL AS BUSINESS NEEDS.

23  
24 Q. DO YOU AGREE WITH DR. COOPER'S PORTRAYAL OF  
25 CALLER ID AS FUEL TO FURTHER TELEMARKEETING

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

ACTIVITIES?

A. ABSOLUTELY NOT. TELEMARKETING ABUSES, INCLUDING OBJECTIONABLE SOLICITATION, IS A PROBLEM THAT EXISTS TODAY WITHOUT THE PRESENCE OF CALLER ID SERVICE. COMPUTERIZED TELEMARKETING CALLING GENERALLY OCCURS AT RANDOM. TELEPHONE NUMBERS ARE OBTAINED BY TELEMARKETING FIRMS FROM MANY SOURCES OUTSIDE THE TELEPHONE COMPANY SUCH AS CREDIT CARD COMPANIES, MAIL ORDER COMPANIES, BANK TRANSACTIONS, AND ENTRIES IN CONTESTS.

TELEMARKETING IS MORE APPROPRIATELY ADDRESSED AS A SEPARATE ISSUE. THIS COMMISSION AS WELL AS THE FLORIDA LEGISLATURE HAS RECOGNIZED THIS, AND HAS ALREADY TAKEN STEPS TO RESTRICT THIS TYPE OF CALLING. IN ADDITION, SOUTHERN BELL'S CALLER ID TARIFF SPECIFICALLY PROHIBITS THE RESALE OF NUMBERS OBTAINED THROUGH THE USE OF CALLER ID SERVICE.

B. IN THEIR DIRECT TESTIMONIES, DR. COOPER, MS. DUNN, MR. TUDOR, AND MS. PHOENIX ALL SUPPORT THE PROVISION OF CALL TRACING ON A PER CALL

1 BASIS TO BE USED AS NEEDED BY ANY SUBSCRIBER.  
2 HOW DOES SOUTHERN BELL RESPOND TO THIS  
3 SUGGESTION?  
4

5 A. SOUTHERN BELL CURRENTLY OFFERS CALL TRACING  
6 SERVICE ON A MONTHLY SUBSCRIPTION BASIS SIMILAR  
7 TO THE WAY WE OFFER CUSTOM CALLING SERVICES AND  
8 OTHER TOUCHSTAR FEATURES. WHEN CALL TRACING  
9 WAS ORIGINALLY TRIALED, IT WAS OFFERED ON A PER  
10 CALL BASIS IN ONE LOCATION AND ON A MONTHLY  
11 BASIS IN ANOTHER LOCATION. BASED ON THE  
12 RESULTS OF THESE TRIALS, SOUTHERN BELL ELECTED  
13 TO OFFER CALL TRACING ON A MONTHLY FLAT RATED  
14 BASIS. THIS WAS DONE FOR TWO REASONS: TO  
15 REFLECT CUSTOMER PREFERENCE, AND TO GENERATE  
16 ENOUGH REVENUES TO COVER THE COST OF THE  
17 SERVICE AND THEREBY PROVIDE CONTRIBUTION TO  
18 SUPPORT BASIC LOCAL EXCHANGE SERVICE.  
19

20 IF CALL TRACING WERE OFFERED AT \$1.00 PER CALL  
21 IT WOULD NOT BE PRICED TO COVER THE COST OF  
22 THE SERVICE. CURRENTLY THIS SERVICE IS SECOND  
23 ONLY TO CALL RETURN IN POPULARITY AMONG THE  
24 TOUCHSTAR FEATURES; THEREFORE, IF IT WERE TO BE  
25 OFFERED ON A USAGE BASIS, THERE WOULD BE A

1                   SIGNIFICANT DROP IN THE CONTRIBUTION THAT IS  
2                   RECEIVED FROM THE SERVICE TODAY.

3  
4                   FURTHERMORE, IN NEW JERSEY A SURVEY SHOWED THAT  
5                   84% OF CALLER ID SUBSCRIBERS SAID THAT CALLER  
6                   ID WAS MORE EFFECTIVE THAN CALL TRACING IN  
7                   HANDLING NUISANCE CALLING. IN MOST CASES,  
8                   UNLESS THE CALL IS TRULY OBSCENE OR  
9                   THREATENING, THE RECIPIENT OF THE CALL JUST  
10                  WANTS THE CALLING TO CEASE; SHE DOES NOT WANT  
11                  TO TAKE LEGAL ACTION.

12  
13                  IT SHOULD ALSO BE NOTED THAT THE AVAILABILITY  
14                  OF CALLER ID IS EXPECTED TO REDUCE THE NUMBER  
15                  OF CALLS INITIATED THROUGH CALL TRACING. MANY  
16                  OF THE CALLS INITIATED TO CALL TRACING ARE  
17                  THOSE THAT DO NOT WARRANT LAW ENFORCEMENT  
18                  INTERVENTION. THESE INCLUDE SALES SOLICITATION  
19                  CALLS, WRONG NUMBERS AND PRANK CALLS WITH NO  
20                  MALICIOUS INTENT. CALLER ID WOULD PROVIDE  
21                  CUSTOMERS CONCERNED WITH THESE TYPES OF CALLS  
22                  AN EFFECTIVE METHOD OF AVOIDING THEM.

23  
24                  Q.       WOULD YOU PLEASE COMMENT ON THE PREFILED  
25                  TESTIMONY OF MR. TUDOR, MS. PHOENIX AND MS.



1 DUNN REGARDING THE POSSIBLE USE OF CALLER ID  
2 INFORMATION FOR VIGILANTE ACTIVITIES?

3  
4 A. ALTHOUGH SOME OF THE TESTIMONY SUGGESTS THAT  
5 CALLER ID MAY SPAWN VIGILANTE OR RETALIATORY  
6 CONFRONTATIONS BETWEEN THE CALLER AND THE  
7 CALLED PARTY, I BELIEVE THIS TO BE PURE  
8 SPECULATION. IN THE SIX STATES WHERE CALLER ID  
9 IS CURRENTLY AVAILABLE, SOME FOR TWO OR MORE  
10 YEARS, THERE IS NO EVIDENCE THAT THIS TYPE OF  
11 ACTIVITY HAS BEEN A PROBLEM.

12  
13 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

14  
15 A. YES.

16

17

18

19

20

21

22

23

24

25