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ORIGINAL
FILE COPY

March 7, 1991

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 891194-TI

Dear Mr. Tribble:

Enclosed for filing are copies of six post hearing depositions taken in this docket. By agreement of the parties and the Commission, these depositions and their exhibits should be placed into the evidentiary record in this docket. Southern Bell will also be filing errata sheet to these depositions as soon as they are available.

Thank you. Please let me know if you have any questions.

Sincerely,

Charles J. Beck
Charles J. Beck
Assistant Public Counsel

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU
- CTR _____
- EAG _____
- LEG CJB/dd
Enclosure
- LIN ccc: All parties of record
- OPC _____
- RCH _____
- SEC
- WAS _____
- OTH _____

Schultz
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DeWitt
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COX
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Lane
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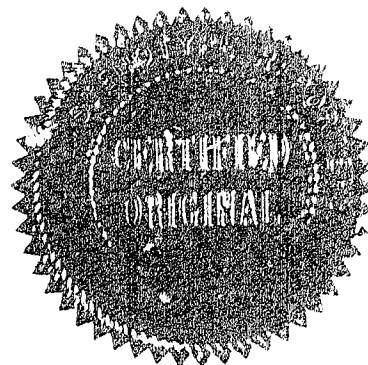
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02309 MAR-7 1991
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FPSC-RECORDS/REPORTING

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings)
by SOUTHERN BELL TELEPHONE AND)
TELEGRAPH COMPANY clarifying)
when a nonpublished number can)
be disclosed and introducing)
Caller ID to TouchStar Service)

DOCKET NO. 891194-TI



DEPOSITION OF: DARLENE N. WALLACE

TAKEN AT THE INSTANCE OF: The Citizens of the State of Florida, by and through Jack Shreve, Public Counsel

DATE: Tuesday, February 19, 1991

TIME: Commenced at 3:00 p.m.
Concluded at 3:50 p.m.

PLACE: Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32301

REPORTED BY: JANE FAUROT
Notary Public in and for the State of Florida at Large

ACCURATE STENOTYPE REPORTERS, INC.
100 SALEM COURT
TALLAHASSEE, FLORIDA 32301
(904) 878-2221

DOCUMENT NUMBER-DATE

02309 MAR-7 1991

ACCURATE STENOTYPE REPORTERS, INC. P.O. RECORDS/REPORTING

APPEARANCES:

REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

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I N D E XWITNESSPAGE

DARLENE N. WALLACE

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EXHIBITS

IDENTIFIED

1 Memorandum from Ms. Wallace

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CERTIFICATE OF REPORTER

29

S T I P U L A T I O N S

1
2 The following deposition of DARLENE N. WALLACE was
3 taken on oral examination, pursuant to notice, for purposes of
4 discovery, and for use as evidence, and for other uses and
5 purposes as may be permitted by the applicable and governing
6 rules. All objections, except as to the form of the question,
7 are reserved until the final hearing in this cause; and reading
8 and signing is not waived.

9 * * *

10 Thereupon,

11 DARLENE N. WALLACE

12 was called as a witness, having been first duly sworn, was
13 examined and testified as follows:

14 MR. KEENER: Before we start, I just want to -- I
15 know you don't stipulate to anything, at least lately you
16 haven't done that. But I would like to say that we won't
17 waive signing and reading, and we'll only go off the
18 record if the witness requests it. Okay?

19 MR. BECK: That's okay with me.

20 MR. KEENER: The taking of the deposition is for
21 purposes of discovery only.

22 MR. BECK: Okay. This deposition, I think, was
23 encouraged by a Commission order that encouraged us to
24 take a deposition prior to hearing to limit the amount of
25 evidence we'd have to present to the Commission.

DIRECT EXAMINATION

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BY MR. BECK:

Q Ms. Wallace, have you been sworn?

A Yes, I have.

Q Would you please state your full name?

A Darlene N. Wallace.

Q By whom are you employed?

A Southern Bell Telephone and Telegraph Company.

Q What is your position with Southern Bell?

A I am the Manager of the Annoyance Call Center for

State of Florida.

Q Is that located in Fort Lauderdale?

A Correct.

Q How long have you held that position?

A Since January of 1990.

Q Could you briefly described what the Annoyance Call Center does?

A Yes. We handle and investigate complaints of customers who are receiving harassing calls.

Q And is that the sole function of the Annoyance Call Center?

A Generally, yes.

Q How long have you been employed by Southern Bell?

A Twenty-Seven years.

Q And what was your position just previously to the

1 Annoyance Call Center?

2 A Claims manager.

3 Q Where was that?

4 A Southern Bell, Fort Lauderdale.

5 Q For the state?

6 A No, for the southeast area and a portion of North
7 Florida.

8 Q Other than your attorneys, have you discussed this
9 deposition with anybody before coming here today?

10 A No.

11 Q Do you recall when Call Trace was put into effect by
12 Southern Bell?

13 A Not specifically, it was prior to my becoming Manager
14 of the Annoyance Call Center; I believe sometime around May or
15 April of 1990 -- 1989, excuse me.

16 Q What effect has Call Trace had on the operations at
17 the Annoyance Call Center?

18 A The work load has increased to the extent that we
19 have had to double our force, increase our floor space,
20 furniture, mechanization, implementation, and so forth.

21 Q How many people are employed there now?

22 A We were just filling some positions. I am just
23 thinking for a moment. Can I give you an estimate?

24 Q Yes.

25 A Thirty.

1 Q Prior to Call Trace going into effect you had about
2 15 persons there?

3 A Approximately, yes. And there was no manager
4 locally.

5 Q Who did run the Annoyance Call Center?

6 A Well, the next level above operations level.

7 Q Then was there a supervisor at the Annoyance Call
8 Center?

9 A Yes, there were two.

10 Q Why do you believe Call Trace has had that effect on
11 the Annoyance Call Center?

12 A The ease of use of the service.

13 Q What do you mean by that?

14 A Well, customers being able to strike star, 5, 7 after
15 they have received a nuisance call has facilitated their
16 reporting harassing calls and having them investigated.
17 Whereas, by the traditional means, prior to that, they would
18 need to keep a log, and we would make a judgment as to whether
19 or not it was practical to put up equipment in the central
20 office manually and through some computer program as well.

21 Q Let me ask you to take a look at Deposition Exhibit
22 Number 1.

23 MR. KEENER: Is the deposition marked Exhibit Number
24 1?

25 MR. BECK: I just marked it 1.

1 MR. KEENER: You just marked it 1?

2 MR. BECK: Yes. I have already handed it out.

3 (Deposition Exhibit Number 1 marked for
4 identification.)

5 BY MR. BECK:

6 Q Ms. Wallace, have you seen Deposition Exhibit 1
7 before?

8 A Yes, sir.

9 Q Are you the author of this memorandum?

10 A Yes, I am.

11 Q Could you tell me what prompted you to write this
12 memorandum?

13 A I guess probably two basic things: One was the
14 understanding that we would -- that we had the technology or
15 would be having the technology for enhanced call tracing,
16 whereby the number could be given back to the customer as well
17 as tracing the call; and number two, some of the abuses that we
18 have noticed with random reporting of calls that really were
19 not in the old traditional harassing call definition. You
20 know, basically, that was the reason for it.

21 Q Okay. Could you give me examples of what you mean
22 not being in the harassing call tradition?

23 A Frivolous use of call tracing, you know, a customer
24 reporting one hang-up call with no apparent, you know, real
25 urgency to it. Well, just reporting a hang-up call because

1 they had, you know, call tracing. Or, redefining, what is
2 harassing to them might be a neighbor calling when they are
3 eating dinner, you know?

4 Q Is that a problem today still with call tracing?

5 A Yes.

6 Q Has anything been done by the Company to help
7 ameliorate what you see as a problem with that?

8 A Well, our representatives, you know, discuss each
9 case with the customers that call in, you know, to try to guide
10 them to something reasonable. If, you know, there is no real
11 reason -- if I can just give an example. One individual, you
12 know, might report 30 calls a month with no pattern to it at
13 all. He just traces everything that comes over his line, and,
14 you know, they can be from all kinds of businesses and
15 residences, and they are not even two calls from the same
16 number for us to do something about it. Our objective is to
17 stop the calls if we can, but in a situation like that it is,
18 you know, an abuse of the service and each call needs to be
19 looked at and investigated. So, that is what I am referring
20 to, that type of thing.

21 Q Are you getting some good, or what you would view as
22 good uses of Call Trace as well?

23 A Oh, yes.

24 Q And what would you see as good uses for Call Trace?

25 A Oh, you know, threatening, obscene, excessive hang-up

1 calls, harassment, you know, those types of things.

2 Q What types of action does the annoyance Call Center
3 take when persons use Call Trace to trace the number for such a
4 call?

5 A What type of action? There are two things that can
6 be done: One is deterrence by the company and the other one is
7 if the customer elects to prosecute, we will assist by
8 providing information to law enforcement.

9 Q Do you offer both of those to the customer when they
10 activate call tracing?

11 A We stress deterrence rather than, you know,
12 presenting tremendous workload to prosecution. There are a lot
13 of things, you know, that we can do by sending letters to the
14 subscriber from whose telephone the calls are originating, a
15 series of letters up to denial and disconnection, if it is
16 serious. And it is quite effective.

17 Q Is that a typical action the Company will take?

18 A Yes.

19 Q Okay. Do you think it has been very effective to do
20 that?

21 A I think so.

22 Q Do you think most calls are handled in that way or,
23 if you know, do more go to the prosecution route?

24 A More to deterrence.

25 Q Okay. Let me ask you to take a look at the Exhibit

1 1. In this letter, I take it, generally, you propose that the
2 person who activates Call Trace be given the trace number
3 directly, is that correct? If I mischaracterized that, please
4 correct me.

5 A Could you point out what particular paragraph you are
6 referring to, or are you talking about the entire flavor of the
7 letter?

8 Q Well, for example, the bottom paragraph, it says,
9 "When a customer pays \$4 monthly for call tracing, he is apt to
10 activate it frivolously because he feels he should be receiving
11 something in return."

12 A Okay.

13 Q And the paragraph before that says, "Given a
14 resolution to caller ID, we should provide the caller's number
15 as an expedient way to give the public what they want."

16 A And your question again, please?

17 Q In your memorandum, do you propose that Southern Bell
18 provide the trace number to the person who activates Call
19 Trace?

20 A Yes, that was my opinion.

21 Q Okay. And why did you feel that way?

22 A Well, it is what the customers are asking for.

23 Q Is that still your opinion?

24 A I don't see any harm in it and, you know, in this day
25 of information, people are very curious and want to know who

1 has been calling them.

2 Q Could you tell me who the addressee of your
3 memorandum is, a Mr. W. J. Schultz?

4 A Yes. He is my level in BellSouth Corp in Atlanta.
5 He is a Staff person.

6 Q Why did you address this letter to him?

7 A He is a gatherer of, you know, opinions of the
8 annoyance call managers. You know, he gathers information and
9 we, you know, hopefully we will have a little piece part in
10 some decision-making, but it is only our opinion. We don't see
11 the whole picture, we see our Annoyance Call Center, but --

12 Q Okay. Do you know whether other managers of
13 Annoyance Call Centers in Southern Bell or South Central Bell
14 share your opinion about providing the trace number to the
15 person who activates Call Trace?

16 A They may, I don't know. You will have to ask them.

17 Q Okay. Do you know whether security at either
18 Southern Bell or BellSouth Corporation has a position about
19 providing the trace number to the person who activates Call
20 Trace?

21 A I would not say that they have a position, a formal
22 position, an opinion perhaps.

23 Q And what is your knowledge about that?

24 A Well, it has been discussed, you know, that we
25 provide the telephone, you know, number to the individual.

1 Q Do you think the Security Department generally agrees
2 with your opinion?

3 A I really can't speak for the whole Security
4 Department.

5 Q Well, for whom can you speak?

6 A For myself.

7 Q Okay.

8 A Yes.

9 Q With whom have you had discussions about that with
10 Security?

11 A Well, most of the Annoyance Call managers and Mr.
12 Schultz.

13 Q And what has been their opinion expressed to you
14 about that?

15 A Well, there has been a lot of opinions. I really
16 couldn't capsulize. I will say this is the position or the
17 opinion of, you know, the managers collectively. I can only
18 speak for myself, but we have kicked this around and talked
19 about it.

20 Q Do you know whether a majority, or if you know, or if
21 you can say, whether a majority of the people agree with you in
22 the Annoyance Call Centers and/or Security?

23 A I don't know what their position is at this time, at
24 this moment.

25 Q Okay. Did you discuss your memorandum with Mr.

1 Schultz?

2 A I am sure that I must have when I sent it to him,
3 but, you know, it has been awhile ago.

4 Q Do you recall what his reaction was to your letter?

5 A I don't recall.

6 Q Has anything happened as a result of this memorandum?

7 A Nothing.

8 Q Other than today, right?

9 A Right.

10 Q This has gone no further than simply send it to Mr
11 Schultz, and that has been the end of it?

12 A I sent a copy to Will Hendricks in Marketing, but as
13 far as I know there has been nothing else come of it.

14 Q Did Will Hendricks ever express any reaction to your
15 memo?

16 A I don't recall having heard anything from him,
17 either.

18 Q Has there ever been any discussion that you are aware
19 about the pricing of Call Trace, to price it on a per call
20 basis instead of on a monthly charge?

21 A Amongst whom?

22 Q Amongst anybody that you are familiar with?

23 A Yes, it has been discussed.

24 Q Okay. And you address that in your memo as well, do
25 you not?

1 A That it --

2 Q On the second page of your memorandum?

3 MR. KEENER: I'm sorry, Charlie, I lost you.

4 BY MR. BECK:

5 Q Concerning the pricing of Call Trace on a per use
6 basis rather than a monthly basis?

7 A Sure. You know, there has been discussion just as --
8 you know, you are looking at my rates here to consider what I
9 proposed, but it was really pie-in-the-sky. There is no
10 substance to these figures. It is just an idea of charging,
11 you know, per call.

12 Q Do you recall anybody with whom you have discussed
13 that?

14 A I am sure that there have been a lot of people, you
15 know, just in chatting on the telephone, but --

16 Q Okay. Can you recall any reaction that you've gotten
17 from those discussions?

18 A Nothing formal, nothing, you know, supportive, you
19 know.

20 Q Okay. Have you gotten any reaction that is negative
21 to that idea of pricing on a per use basis?

22 A I don't remember.

23 Q You don't recall any negative reactions?

24 A No.

25 Q You don't recall any positive reactions, either?

1 A Well, you know --

2 MR. KEENER: I think she answered your question the
3 first time, you know, if you want to -- asked and
4 answered.

5 BY MR. BECK:

6 Q Okay. The objection is noted. Can you answer my
7 question now?

8 A Okay. Go ahead and ask me.

9 Q Do you recall neither positive nor negative reactions
10 to the idea of pricing Call Trace on a per call basis?

11 A Well, I don't recall specific conversations, but I do
12 know there has been a give and take in discussions from one or
13 the other, but as far as positive, or negative, or neutral, I
14 really can't -- you know, I am sure there has been some of all
15 of that in there in discussing a subject. But, again, this is
16 my opinion and, you know, the way the Company sets the rates
17 for this type of service, they have a lot more knowledge than I
18 do from all different parts of the Company. I just have this
19 little piece of action here in the Annoyance Call Center.

20 Q Would it still be your opinion that it would be
21 desirable to price Call Trace on a per use basis?

22 A I have not -- I have some other ideas, too. I think
23 the monthly rate that we are charging could, you know, remain
24 as it is. But for those abusers who require over and above,
25 you know, what would be reasonable and profitable, both

1 reasonable for the customer and profitable for us, I think
2 that, you know, maybe we should add on something. But the
3 monthly rate is probably the way to go, and I am sure it is,
4 because, you know, the Company has all the input of the
5 accounting and, you know, tariff information that I am not
6 familiar with in my part of the job.

7 Q The last sentence of the first paragraph on the
8 second page?

9 A Uh-huh.

10 Q You state that, "The abolishment of the \$4 monthly
11 charge and universal service to all subscribers would
12 discourage potential offending callers who would be aware that
13 their calling number would be delivered."

14 A Uh-huh.

15 Q I take it there when you were proposing usage charges
16 that coincident with that you are proposing abolishing the
17 monthly charge?

18 A Yes, right. But you must remember, too, I was in the
19 job for about 2-1/2 months when I wrote this letter, and it
20 was, you know, my idea at that time. And, you know, it sound
21 a little utopian to have it universally available. I don't
22 know whether or not physically, you know, and rate-wise they
23 can do it.

24 Q Are you saying your opinion has changed now about
25 abolishing the monthly charge?

1 A Well, that is what I just said before, that perhaps
2 for the abuser of the service that, you know, we would still
3 have the \$4 monthly rate, but maybe charge something over and
4 above that for those who are abusing it or causing -- say, just
5 roughly, let me give you another figure, say over ten
6 investigations a month. You know, you have to draw the line
7 someplace to make it equitable.

8 Q How about for those not abusing the service, would
9 you favor abolishing the monthly charge or not?

10 A No.

11 Q Okay. Now, what is the basis for the change of your
12 opinion then to no longer favor abolishment of the monthly
13 charge as you did in your memo?

14 A Well, again, you know, this is just one thought at
15 that time, and I am continuing to think about, you know, the
16 rate, certainly, and, you know, I have no formal plan to
17 present to anybody.

18 Q Well, I am wondering what caused you to change your
19 opinion, though?

20 A Well, again, I don't have the total knowledge of what
21 goes into that \$4 makeup to begin with. But if the Company
22 decided that was the position we were going to take, obviously,
23 it was based upon, you know, some studies that I wasn't privy
24 to at the time I wrote this letter. And just thinking, you
25 know, about it, you know, you certainly wouldn't want to change

1 a policy based upon, you know, my letter of March of 1990.

2 Q So, are you changing your opinion for the sole reason
3 that the Company doesn't support that opinion?

4 A I'm sorry?

5 Q Are you changing your opinion because the Company
6 hasn't agreed with your opinion? I am wondering if there is
7 some reason other than that that you have changed your opinion.

8 MR. KEENER: Other than the reason she has already
9 given you?

10 MR. BECK: Yes.

11 BY MR. BECK:

12 Q Which I take is simply that you changed your mind,
13 but I haven't heard anything to tell me why.

14 A Well, I thought about it in a lot of different ways
15 over a period of time. This is one opinion at that time.

16 Q Would a usage charge discourage the abuser, as you
17 call it, that calls in a lot?

18 A I am sure it would.

19 Q And a fixed monthly charge encourages what you call
20 the abuser or calling in a lot for frivolous reasons, would it
21 not?

22 A That is true.

23 Q So, a usage charge would be better to deter that
24 abuser than would a monthly charge, would it not?

25 A If we are just talking about the abuser, yes.

1 Q Is there any other reason --

2 A But you are talking about a majority of people here
3 not just the abuser. The abuser is the exception to the rule.

4 Q Is it any other reason other than what you have
5 already stated, that you would no longer favor abolishment of
6 the monthly charge?

7 A You know, I can't think of anything.

8 MR. BECK: That is all I have. Thank you.

9 THE WITNESS: You're welcome.

10 MR. BECK: I would like to reserve the right to
11 continue this deposition after I have had a chance to
12 read the additional documents that we were provided.

13 MR. KEENER: And we can hopefully do that this
14 afternoon?

15 MR. BECK: Yes, I will start reading.

16 MR. KEENER: Because Darlene will be out-of-pocket.

17 MS. GREEN: Staff has no questions.

18 MR. DORAN: No questions.

19 MR. MATHUES: I have several.

20 CROSS EXAMINATION

21 BY MR. MATHUES:

22 Q Ms. Wallace, my name is Steve Mathues. I represent
23 the Department of General Services.

24 A Yes.

25 Q What is your understanding of Caller ID?

1 A Caller ID is an expedient way for people to come
2 home, say -- I'll just give an example -- come home from work,
3 take a look at list of calls of people who may have called --
4 or called during the day and choose, you know, to whom they
5 want to return a call. Or if they are home, and they see the
6 number on there and, you know, the telephone is ringing, the
7 number is there, they can make a decision as to whether or not
8 they want to answer the telephone.

9 Q Is it your position today that delivery of the trace
10 number should be given to the subscriber in a Call Trace
11 situation?

12 A We would like to be able to.

13 Q Would there be a difference in the end result between
14 delivery of the number through Call Trace and delivery of the
15 number through Caller ID?

16 A Would there be a difference in the end result?

17 Q Yes.

18 A Yes, indeed, because on call tracing you are only
19 able to trace the last call. Whereas, Caller ID, it gives you
20 a reference list of the people who have been trying to reach
21 you. They are different purposes, although it can assist, you
22 know, with some harassing calls. But that is not the purpose
23 for Caller ID in total, maybe a little piece part of it.

24 Q Are you familiar with the concept of "calling number
25 blocking"?

1 MR. KEENER: I am going to object at this point,
2 because I don't think it comes in the scope of the
3 letter. And one of the -- I guess you were at the
4 conference when we talked about the discovery documents,
5 and what have you, and all of the questions are supposed
6 to come out of the document itself. I mean, if you can
7 explain to me somehow how it does, I will accept it; I
8 will listen. But other than that, I don't see how it
9 falls within the scope of the letter.

10 MR. MATHUES: Well, are you going to instruct the
11 witness not to answer, or is that your objection for the
12 record?

13 MR. KEENER: I would like to take care of any, you
14 know, problems we have in terms of taking something back
15 to the Prehearing Officer here, you know. And that is
16 why I say if you have an explanation about how that falls
17 within the context of the letter, I would be willing to
18 listen. But as I can tell right now it doesn't.

19 MR. BECK: Well, what if it came within the ambit of
20 any of the documents you've provided for the deposition
21 today? Do you still have an objection?

22 MR. KEENER: In that case, probably not.

23 MR. BECK: And you have reviewed those documents,
24 have you not?

25 MR. KEENER: I have reviewed most of them, yes.

1 MR. BECK: And doesn't that come within the ambit of
2 these documents?

3 MR. KEENER: Well, if you can show me where it does,
4 I will consider it, Charlie.

5 Just for the record, I didn't instruct the witness
6 not to answer the question. I just objected to it.

7 MR. MATHUES: I will just save the question until we
8 come back for the continuation.

9 MR. KEENER: Okay.

10 BY MR. MATHUES:

11 Q Could you explain to me how Call Trace works?

12 A Yes, sir. You are talking about the TouchStar Call
13 Trace versus the old traditional way of putting up the
14 equipment?

15 Q Correct.

16 A Okay. An individual receives a call that they feel
17 is harassing. They hit star 5, 7 on the telephone and, you
18 know, after the other party has hung up and then the recorded
19 announcement will say you have successfully traced a call. I
20 am paraphrasing this. Call your annoyance call center for
21 additional investigation, if you wish to investigate further,
22 or something like that. And is that what you wanted?

23 Q That is basically what I was interested in. Do you
24 have a percentage of the number of people who actually call you
25 after they have activated star 5, 7?

1 A I can remember some figures for the month of January.

2 Q '91?

3 A Yes. I'm sorry. It's the end of January '91. I
4 believe there were about 35,000 activations, of that
5 11,000-and-some calls were reported to us. So, you know, you
6 are talking close to, you know, 30 percent or something, 33
7 percent.

8 Q Would you have any way of knowing if a particular
9 subscriber traced every call he or she received but didn't call
10 you?

11 A We wouldn't know every single call he got, because I
12 don't know how we would keep a record of that. If you received
13 100 calls during the daytime, would the telephone company know
14 you received 100 say local calls and activated all 100? No, I
15 have no knowledge that there is a way to do that.

16 Q When you referred earlier in your deposition to the
17 people you call the abusers of the service, would those be then
18 only people who followed up and called you?

19 A Right. I am not referring to the activations, but
20 the obvious, you know, strange cases where, you know, you just
21 wonder what they are doing, because you offer number change and
22 they don't want that, free number change. You offer -- well,
23 you can't do anything about deterrence because there aren't at
24 least two calls within ten days coming from the same number.
25 That is no good. We can't go to the other subscriber, to each

1 individual one, because they made a call to that number. That
2 wouldn't be fair to them. We would be getting complaints from
3 all of those people, "Why did you send me a letter of this
4 nature?" And I don't believe the prosecution would handle that
5 type of a situation. However, the customer has the, you know,
6 he can go ahead and talk to prosecution about it, or the local
7 law enforcement. And we will give them every single telephone
8 name and address, and if they can put together a pattern, they
9 can go out and investigate it. But I don't think they want
10 those types of cases either, because they are really unusual,
11 strange.

12 MR. MATHUES: That is all I have, but I will reserve
13 the right to ask more questions based on the new
14 documents.

15 MR. BECK: Okay.

16 MR. KEENER: Any other questions? Okay. Why don't
17 we take a recess?

18 (Off the record briefly)

19 MR. KEENER: Does anybody have anything else?

20 MR. MATHUES: I do.

21 BY MR. MATHUES:

22 Q Ms. Wallace, just prior to this deposition there were
23 some documents handed out. Were those documents that you
24 produced?

25 A Yes.

1 Q When was the first time you were asked to produce
2 documents relating to Caller ID?

3 A That was this week.

4 Q When this week?

5 A Friday.

6 Q Last week?

7 A Yes. I mean, within the week, excuse me.

8 MR. MATHUES: Thank you. That is all I have.

9 MR. BECK: I have a question based on that.

10 REDIRECT EXAMINATION

11 BY MR. BECK:

12 Q At no time prior to this past week had anybody asked
13 you to search your records for documents about caller ID or
14 Call Trace?

15 A No.

16 MR. BECK: Thank you.

17 MR. KEENER: Just just for the record, Ms. Wallace
18 was asked to respond to Staff interrogatories.
19 Apparently, she was overlooked in the search last summer
20 by a regulatory document production person, and so when
21 we discovered that we went and made sure we got all the
22 documents produced that she had.

23 MR. FALGOUST: You probably ought to let her state
24 that.

25 THE WITNESS: I worked Sunday.

1 MR. KEENER: Let me just ask --

2 RE-CROSS EXAMINATION

3 BY MR. KEENER:

4 Q Ms. Wallace, I am going to ask you a couple of
5 questions on -- well, not redirect, on cross.

6 Let me just ask you about the document production
7 just for the record. Did you receive a request from someone
8 within the Company regarding certain questions asked by the
9 Public Service Commission Staff?

10 A Yes.

11 Q And did you assist in responding to those questions?

12 A Yes, I did.

13 Q Okay. Regarding a statement you made earlier about
14 providing the number for call tracing, you stated that, "We
15 would like to be able to give the number." Ms. Wallace, when
16 you said "we," were you talking about you and someone else you
17 know, or were you talking about "we," being the Company?

18 A Myself and my people in my Annoyance Call Center.

19 Q So, you weren't referring to the Company wanting to
20 be able to give out the number for Call Trace for Southern
21 Bell?

22 A That's correct. I was not.

23 Q And, Ms. Wallace, are you familiar with the tariff
24 and what the tariff states with regard to call tracing?

25 A Yes.

1 Q And what does the tariff say with regard to providing
2 the telephone number when someone activates or requests a Call
3 Trace with regard to Southern Bell providing that telephone
4 number to the person making that request?

5 A It indicates the customer will not be given the
6 number, or the subscriber information, whatever, name, address,
7 telephone number.

8 MR. KEENER: Okay. That is all.

9 (The deposition concluded at 3:50 p.m.)

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CERTIFICATE OF REPORTER

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STATE OF FLORIDA)
COUNTY OF LEON)

I, JANE FAUROT, Court Reporter, Notary Public in and for the State of Florida at Large:

DO HEREBY CERTIFY that the foregoing proceedings was taken before me at the time and place therein designated; that before testimony was taken the witness/witnesses were duly sworn; that my shorthand notes were thereafter reduced to typewriting; and the foregoing pages numbered 1 through 28 are a true and correct record of the proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor relative or employee of such attorney or counsel, or financially interested in the foregoing action.

WITNESS MY HAND AND SEAL this 5th day of March, 1991, in the City of Tallahassee, County of Leon, State of Florida.


JANE FAUROT, Court Reporter
Notary Public in and for the
State of Florida at Large

My Commission Expires: July 16, 1993

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings by) Docket No. 891194-TI
SOUTHERN BELL TELEPHONE AND TELEGRAPH)
COMPANY clarifying when a nonpublished)
number can be disclosed and introducing)
Caller ID to TouchStar Service)
_____)

Deposition Exhibit No. 1



Southern Bell

D. A. Wallace
Manager-Annoyance Call Center

Room 10205
6451 North Federal Highway
Fort Lauderdale, Florida 33308
492-1623

March 20, 1990

MEMORANDUM

TO: W. J. Schultz
Staff Manager-Security
BellSouth Corp.

FROM: D. A. Wallace
Manager-Florida ACC
Southern Bell

RE: Call Tracing

The proposition of delivering the telephone number of the caller when the called party activates *57 stimulates thought over the entire Call Tracing offer.

One cannot address Call Tracing without discussing the impending Caller ID offering in Florida which is under scrutiny by the PSC to assure that law enforcement and other special interest groups' concerns of anonymity are resolved. This is the only roadblock to instituting the *57 number delivery service.

Given a resolution to Caller ID, we should provide the callers number as an expedient way to give the public what they want. Call Tracing is a phenomenal marketing success, but the activations and follow-up calls to the ACC's by customers have indicated most calls are not of an urgent nature; more of a curiosity over "hang-up" calls or apparent misdirected calls. Since there is such a proven market for "information" (versus investigations/deterrence; the traditional reason for the ACC), we should change our approach to procedure and pricing.

When a customer pays \$4.00 monthly for Call Tracing, he is apt to activate it frivolously because he feels he should be receiving something in return. That is very normal human behavior. However, the ACC's have become so inundated with incidental type referrals, which, added to more urgent traditional ACC cases, have resulted in substantial expansion costs (force, floor space, mechanization, communications, furniture, operating expenses, etc.).

It is sensible to deliver the caller telephone number at the time of the Call Tracing activation. Additionally, a pricing study is in order to consider charging per activation as we would for either "411" service or long distance calls. Consider \$.50, \$.75, or \$1.00 per activation. Abolishment of the \$4.00 monthly charge, and universal service to all subscribers would discourage potential offending callers who would be aware that their calling number would be delivered.

Both the customers' desires for "information" and the Company's increased revenue objectives could be satisfied by implementing these changes.