

OFFICE OF THE ATTORNEY GENERAL

DEPARTMENT OF LEGAL AFFAIRS

THE CAPITOL

TALLAHASSEE, FLORIDA 32399-1050

ROBERT A. BUTTERWORTH
Attorney General
State of Florida

ORIGINAL
FILE COPY

March 25, 1991

Mr. Steve C. Tribble
Director, Division of Records
& Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0865

Re: Docket No. 891194-TL
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

Dear Mr. Tribble:

Enclosed is the original and 15 copies of the Supplemental Brief
of Attorney General, Statewide Prosecutor, and Florida Department
of Law Enforcement for filing in the above-referenced matter.

ACK Service has been made as indicated on the attached Certificate of
Service. If there are any questions with regard to this matter,
AFA please contact the undersigned at (904) 483-8253.

APP
CAF Sincerely,

Virrindia Doss

QIP Virrindia Doss
EAG Assistant Attorney General

LEG [initials]

LIP

RCF

WAC

WAS

ZM

DOCUMENT NUMBER-DATE
02934 MAR 25 1991

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings by) DOCKET NO. 891194-TI
SOUTHERN BELL TELEPHONE AND TELEGRAPH) DATE FILED:
COMPANY clarifying when a nonpublished) October 26, 1990
number can be disclosed and introducing)
Caller ID to TouchStar Service.)

SUPPLEMENTAL BRIEF OF ATTORNEY GENERAL,
STATEWIDE PROSECUTOR, AND FLORIDA
DEPARTMENT OF LAW ENFORCEMENT

ROBERT A. BUTTERWORTH
ATTORNEY GENERAL

PETER ANTONACCI
DEPUTY ATTORNEY GENERAL
FLORIDA BAR NO. 0280690

RICHARD DORAN
ASSISTANT DEPUTY ATTORNEY GENERAL
FLORIDA BAR NO. 0325104

VIRLINDIA DOSS
ASSISTANT ATTORNEY GENERAL
FLORIDA BAR NO. 0607894

DEPARTMENT OF LEGAL AFFAIRS
THE CAPITOL, SUITE 1601
TALLAHASSEE, FLORIDA 32399-1050
(904) 488-8253

MELANIE HINES
STATEWIDE PROSECUTOR
FLORIDA BAR NO. 0279250
2540 EXECUTIVE CENTER CIRCLE W.
SUITE 100, DOUGLASS BUILDING
(904) 487-2807

TIM MOORE
COMMISSIONER

MICHAEL RAMAGE
FLORIDA DEPARTMENT OF
LAW ENFORCEMENT
FLORIDA BAR NO. 0261068
POST OFFICE BOX 1489
TALLAHASSEE, FLORIDA 32302
(904) 488-8323

DOCUMENT FORWARDED BY

02934 MAR 25 1991

ISS-RECORDS/REPORTS

TABLE OF CONTENTS

	<u>PAGE(S)</u>
PRELIMINARY STATEMENT	1
INTRODUCTION	2
ISSUES:	
Issue 3	3
Issue 5	4
Issue 6	7
Issue 13	8
CERTIFICATE OF SERVICE	10
INDEX TO APPENDIX	12

*

PRELIMINARY STATEMENT

Pursuant to the Commission's Order issued March 12, 1991, this supplemental brief is filed for the purpose of advancing further argument and citation to authority as to the issues initially briefed by the parties on January 11, 1991, and to address matters raised in the additional discovery made subsequent to the hearings of November 28 and 29, 1990.

References to the hearing transcript shall be by use of the symbol "T" followed by the appropriate page number in parentheses. References to the deposition transcripts entered into evidence shall be made by use of the symbol "TR" followed by the deponent's name and page number in parentheses.

INTRODUCTION

The Attorney General, Statewide Prosecutor and Florida Department of Law Enforcement adopt and reassert all arguments presented in their Initial Brief to this Commission. In addition, they point out that federal legislation is now pending which would require per-call blocking where Caller ID service is offered. Thus, there exists an additional question as to the future legality of the service as proposed.

The deposition testimony of William Schultz and Michael E. Cox indicates that Caller ID does not in fact serve to reduce annoyance calls and can result in harassment to a party who accidentally misdials.

Finally, the undersigned reassert their position that Call Trace is a viable alternative to Caller ID and urge this Commission to rule favorably on the Public Counsel's Petition to offer Call Trace at reasonable, usage-based rates.

Issue 3: Does Caller ID violate any federal laws or laws of the State of Florida?

Attorney General, Statewide Prosecutor, and FDLE Position: Caller ID would violate both Florida and federal law.

Discussion:

The Attorney General, Statewide Prosecutor, and Florida Department of Law Enforcement reaffirm the position stated in their initial brief that Caller ID would violate both Florida and federal wiretap law. Additionally, it should be noted that bills are pending in the United States Congress which would permit the offering of Caller ID-type services only upon the condition of free per-call blocking. S.652 102nd Cong., 1st Sess. (1991); H.R. 1449, 102nd Cong., 1st Sess. (1991) California has already adopted similar legislation (1991 Cal.Stat. 2893), and similar enactments are being considered in Illinois, Maine, Maryland, Oregon, Vermont and Washington. See Joint Filing of the North Carolina Attorney General and Public Staff, Re: Caller ID, Docket No. P-55, Sub 925 (March 15, 1991) (Hereinafter "Joint Filing") (attached as Appendix A). Even were Caller ID found not violative of federal or Florida wiretap law, passage of the bills now pending in Congress would call into question the legality of the service as currently proposed.

Issue 5: What are the benefits and detriments to Florida's consumers of Caller ID services?

Attorney General, Statewide Prosecutor, and FDLE Position: Caller ID affords few benefits unavailable from other sources, and carries the potential for extreme detriment to law enforcement officers, potential victims of crime, and existing telephone customers.

Discussion:

The telephone companies assert the reduction of obscene/annoying/harassing phone calls as one of the major benefits of Caller ID service. (T 55-56, 438). However, experience does not support this claim. William James Schultz, a staff manager in the security department of Bell South Corporation, testified in deposition that he contacted New Jersey Bell in response to a newspaper article which indicated that Caller ID had resulted in a reduction of annoyance calls of 50 percent. A manager in the Annoyance Call Center at New Jersey Bell informed him that they had not had a 50 percent reduction in their Annoyance Call Center problems but rather, a 50 percent reduction in the amount of traps and traces placed. (TR Schultz, p.8). As a result of his conversation with New Jersey Bell, Mr. Schultz sent a memo to the Bell South general security manager stating, "It appears that they (New Jersey Bell) are playing with the numbers. Naturally, the traps will reduce with the introduction of Caller ID and Call Trace. There is no reason to

put up a trap if the customer has Call Trace." (TR Schultz, Exhibit #1). While Mr. Schultz sought to ameliorate the damaging nature of this observation by suggesting that a study referenced in the newspaper article could have been the source of the 50 percent reduction figure (TR Schultz, p.10), the logic of his original conclusion is inescapable. The benefit of annoyance call reduction is questionable at best.

In contrast, a possible detriment was brought into sharp focus by the additional discovery conducted after the November hearings.

The Attorney General, Statewide Prosecutor, and FDLE pointed out in their initial brief the potential for violent confrontations carried with the self-help intervention which Caller ID implicitly, if not expressly, promotes. (Brief of Attorney General, Statewide Prosecutor, and Florida Department of Law Enforcement, p.27). This potential was illustrated by the testimony of Michael E. Cox, an assistant vice president of the security department of South Central Bell Telephone Company. (TR Cox, p.5). Mr. Cox became aware of a customer who had accidentally misdialed a Caller ID subscriber. Subsequently, the subscriber to Caller ID harassed and abused the customer. The experience of the innocently misdialing customer prompted Mr. Cox to address a memo to the Vice President and Comptroller of Bell South Corporation. (TR Cox, p.6). The memo indicated, "This

case and the accompanying red border letter is a prime example of how we may expect a number of customers to react in the future to Caller ID when wrong numbers, misdials, etc. occur." (TR Cox, Exhibit #1).

The undersigned parties continue to assert their previously adopted position, that the detriments of Caller ID, as illustrated by the above example, far outweigh the purported benefits of the service.

Issue 6: Are there any existing CLASS services (e.g., Call Trace, Call Return, Call Block, etc.) that have similar functions and/or benefits as Caller ID; if so, what are their detriments? Is their rate structure appropriate?

Attorney General, Statewide Prosecutor, and FDLE Position: We join the position of the Public Counsel that Call Trace at a reasonable price will allow the public to achieve the essential benefits of Caller ID without the major cost or impact of Caller ID.

Discussion:

The undersigned reassert the position, stated in their initial brief, that Call Trace, offered at reasonable rates on a per-use basis, would accomplish the stated Caller ID purpose of reducing annoying and harassing calls, without the danger to law enforcement personnel and victims of abuse which inhere in the Caller ID format.

In addition, the Commission's attention is directed to the Petition of the Public Counsel to require the offering of Call Trace service to all customers at reasonable, usage-based rates filed September 21, 1990. To date there has been no ruling on the Petition. Call Trace service on a reasonable, usage-based rate would largely obviate the need for Caller ID and the undersigned urge the Commission to grant the Petition.

Issue 13: What further action should be taken of Southern Bell's tariff filing introducing Caller ID and changing the conditions under which nonpublished information will be divulged? What should be the effective date of such action?

Attorney General, Statewide Prosecutor,
and FDLE Position: Southern Bell's
tariff filing should be rejected.

Discussion:

The additional discovery conducted subsequent to the first hearing in this cause only fortifies the undersigned's position that Caller ID should be allowed on a statewide basis only if universally available per-call and per-line blocking is offered in conjunction with the service. Such blocking should be at no cost or charge to the blocking party since those utilizing Caller ID should pay the cost associated with it.

The undersigned observed, in their initial brief, that universal per-call blocking has been mandated in Kentucky, South Carolina, Pennsylvania and Maryland (Initial Brief, p.42). Nevada,¹ Alabama,² and the District of Columbia,³ also require blocking, as do Delaware, Nebraska and Vermont. Joint Filing, at A-6, A-9 and A-11. In addition, Nevada and Alabama require free

¹ In re Filing by Central Telephone Company, Docket No. 80-333.

² Re: South Central Bell Telephone Company, Docket No. 21592.

³ In the Matter of the Application of the Chesapeake and Potomac Telephone Co., Formal Case No. 891

per-line blocking. This Commission should follow the lead of those states and deny the tariff unless it is modified to provide free per-call and per-line blocking.

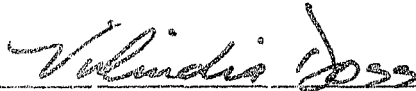
Respectfully submitted,

ROBERT A. BUTTERWORTH
Attorney General

PETER ANTONACCI
Deputy Attorney General
Florida Bar No. 0280690

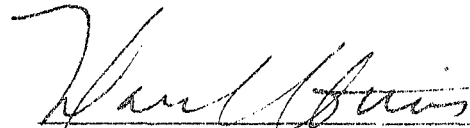


RICHARD E. DORAN
Assistant Deputy Attorney General
Florida Bar No. 0325104



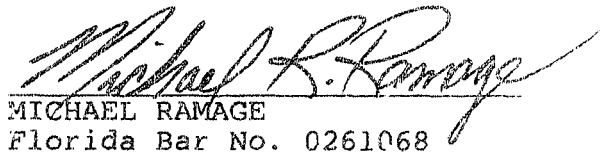
VIRLINDIA DOSS
Assistant Attorney General
Florida Bar No. 0607894

DEPARTMENT OF LEGAL AFFAIRS
The Capitol
Tallahassee, Florida 32399-1050
(904) 488-8253



MELANIE HINES
Statewide Prosecutor
Florida Bar No. 0279250

TIM MOORE
Commissioner

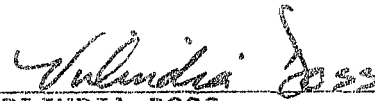


MICHAEL RAMAGE
Florida Bar No. 0261068

FLORIDA DEPARTMENT OF LAW
ENFORCEMENT
Post Office Box 1489
Tallahassee, Florida 32302
(904) 488-8323

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoin SUPPLEMENTAL BRIEF OF ATTORNEY GENERAL, STATEWIDE PROSECUTOR AND FLORIDA DEPARTMENT OF LAW ENFORCEMENT has been furnished to the following list of people by U. S. Mail this 25th day of March, 1991.



VIRLINDIA DOSS
Assistant Attorney General

Southern Bell Telephone and
Telegraph Company
Attn: Marshall M. Criser, III
150 S. Monroe Street, #400
Tallahassee, FL 32301

Messer Law Firm
Attn: Bruce Renard
Post Office Box 1876
Tallahassee, FL 32302-1876

A. Aabaco Locksmith
Attn: David Merkatz
Post Office Box 5301
Ft. Lauderdale, FL 33310

Winston Pierce
Department of General Services
Koger Executive Center
2737 Centerview Drive
Knight Building, #110
Tallahassee, FL 32399-0950

Angela Green
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Jeffrey Cohen
Attorney for Medical
Association, Inc.
Post Office Box 2411
Jacksonville, FL 32203

J. M. Buddy Phillips
Florida Sheriff's Association
Post Office Box 1487
Tallahassee, FL 32302-1487

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

Charlene Carres
American Civil Liberties Union
Post Office Box 1031
Tallahassee, FL 32302

Alan Berg
United Telephone Company
Post Office Box 5000
Altamonte Springs, FL 32716-5000

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

Lee Willis
227 South Calhoun Street
Post Office Box 391
Tallahassee, FL 32302

Joyce M. Brown
Center Against Spouse Abuse, Inc.
Post Office Box 414
St. Petersburg, FL 33731

Stephen Mathues
Staff Attorney
Department of General Services
Office of General Counsel
Knight Building, Suite 309
Koger Executive Center
2737 Centerview Drive
Tallahassee, FL 32399-0950

Thomas Parker
Associate General Counsel
GTE Florida Incorporated
Post Office Box 110, MC 7
Tampa, FL 33601-0110

Glenn W. Mayne
Department of General Services
Division of Communications
2737 Centerview Drive
Knight Building, Suite 110
Tallahassee, FL 32399-0950

Dale Cross
Central Telephone Company
Post Office Box 2214
Tallahassee, FL 32316-2214

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings by) DOCKET NO. 891194-T1
SOUTHERN BELL TELEPHONE AND TELEGRAPH) DATE FILED:
COMPANY clarifying when a nonpublished) October 26, 1990
number can be disclosed and introducing)
Caller ID to TouchStar Service.)

INDEX

APPENDIX TO
SUPPLEMENTAL BRIEF OF ATTORNEY GENERAL,
STATEWIDE PROSECUTOR, AND FLORIDA
DEPARTMENT OF LAW ENFORCEMENT

North Carolina Attorney General's and Public
Staff's Joint Filing

PAGE(S)

A - 1-12



State of North Carolina

Department of Justice

P.O. BOX 629

RALEIGH

27602-0629

LACY H. THORNBURG
ATTORNEY GENERAL

RECEIVED
March 15, 1991
MAR 18 1991

Office of
Public Counsel

Ms. Geneva T. Thigpen, Acting Chief Clerk
North Carolina Utilities Commission
Post Office Box 29510
Raleigh, North Carolina 27626-0510

Re: Caller ID, Docket No. P-55, Sub 925

Dear Ms. Thigpen:

Attached is the Attorney General's and Public Staff's joint filing in response to the Commission's Order of March 5th, 1991 requesting information on the status of Caller ID throughout the country. This filing contains the results of a survey made in the past week of Caller ID activities in the 50 states and the District of Columbia.

The information was elicited by faxing a survey to consumer advocates and/or commissions in each jurisdiction. A copy of the survey questionnaire is incorporated in the filing. Further, one copy only of the individual responses is presented for filing with you for reference by the Commission or any party. Of particular interest in the background documents are two status reports prepared by United Telephone and dated January 28 and February 25, 1991. Though not used as the source of the attached report and neither inclusive of all states nor of events of recent weeks (in Indiana, New York, Massachusetts and Vermont), the United documents are excellent cross-references.

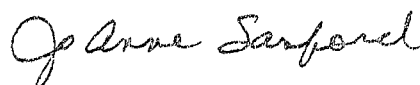
By copy of this letter we are serving all parties of record with our report.

Ms. Geneva T. Thigpen
March 15, 1991
Page 2

Thank you for your assistance.

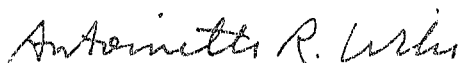
Very truly yours,

LACY H. THORNBURG
Attorney General



Jo Anne Sanford
Special Deputy Attorney General

ROBERT P. GRUBER
Executive Director of Public Staff



Antoinette Wike, Chief Counsel
Public Staff
P. O. Box 29520
Raleigh, NC 27626-0520

JAS/jw

Enclosures

cc: Parties of Record

CALLER ID QUESTIONNAIRE FOR _____

[Please respond by return FAX (919/733-9565) on this sheet to N. C. Attorney General by Monday March 11!

1. Has a Caller ID tariff been filed? If so, by which company(s) and when?

2. If the service has been approved:
 - (a) What was the approval date?
 - (b) Does it include per-call blocking?
 - (1) If so, is it for all customers or only for "vulnerable" or "at risk" groups such as law enforcement?
 - (2) Is it free?
 - (3) If not, what is the cost?
 - (c) Does it include per-line blocking?
 - (1) Is it for all customers or only for "at risk" groups?
 - (2) Is it free?
 - (3) If not, what is the cost?
 - (d) Is the matter on appeal or has a motion for reconsideration been made? If so, by whom and on what basis?

3. If the service has not yet been approved, please state whether each company's filed proposal includes:
 - (a) Per-call blocking? _____ For all customers or limited to "certain" groups? _____ At what cost? _____
 - (b) Per-line blocking? _____ For all customers or limited to "certain" groups? _____ At what cost? _____

4. If any of your telcos or BOCs have announced an intention to file for Caller ID approval, have they announced a plan for blocking? _____ if so, is it to be per call and/or per line? Free or at a charge? (Circle correct answers)

5. Has legislation concerning Caller ID been announced or filed in your state? Briefly, what does it provide?

SUMMARY OF CALLER-ID ACTIVITY
NORTH CAROLINA ATTORNEY GENERAL
AND PUBLIC STAFF
MARCH 15, 1991

U. S. Congress

Last session: Sen. Kohl (WI) introduced a bill to amend the Electronic Communications Privacy Act (ECPA) to allow CID but to require blocking. Companion bill was introduced by Rep. Kastenmeier (WI) in House, but neither came to a vote.

This session: Sen. Kohl offering an amended version of the previous bill, which amends the ECPA. It would require that free blocking be available to block receipt of any identifying information, presumably either name, number or picture. (S.652) Titled the "Telephone Privacy Act of 1991," it was introduced this week.

Rep. Markey's (MA) H.R. 1305 would amend the Communications Act (instead of the ECPA) to require free per call blocking. This approach differs from Sen. Kohl's in that it would direct the FCC to promulgate rules requiring free per call blocking.

FCC

Joseph Baer has petitioned the FCC to permit use of alternate identity codes in lieu of directory or billing numbers for non-published subscribers. He further requests an FCC stay of all state action pending resolution of his petition. No decision yet.

Corporate Policies [Note: These are policies that companies support, not necessarily those followed by PUC's in service area.]

Regional Bell Operating Companies

NYNEX (7 states)	Proposes free per-call blocking
S.W. Bell (5 states)	Proposes free per-call blocking
U.S. West (14 states)	Proposes free per-call blocking
PacTel (2 states)	Proposes free per-call blocking
Bell South (9 states)	Proposes "All Number Delivery"
Ameritech (5 states)	Proposes "All Number Delivery"
Bell Atlantic (7 states)	Proposes "All Number Delivery"

Centel	Proposes free per-call blocking
Contel	Proposes unrestricted Caller ID
GTE	Proposes unrestricted Caller ID; offers Protected Number Service for privacy concerns.
Rochester Tel.	Supports free per call blocking (Though as a N.Y. company, is subject completely to March 1991 PUC order which sets forth the requirements of free per-call and per-line blocking).
United	Favors unrestricted Caller ID but varies between "no blocking" and free per-call blocking among filings in four states.

States

Attached

STATE	CID FILED	CID APPROVED	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	APPEAL/NOTION	CID PROPOSAL PENDING	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	CID PROPOSAL ANNOUNCED	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	PROPOSED/FILED LEGISLATION	COMMENTS
AL	7/12/90	12/4/90	Y	YES	FREE	YES	NO	--	--	--	--	--	--	--	NO	SOUTH CENTRAL BELL ALLOWED ONE YEAR TRIAL IN BIRMINGHAM. BLOCKING ORDERED OVER BELL'S OBJECTION. COMPANY'S MOTION FOR RECONSIDERATION OR REHEARING PENDING.
AR	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	
AZ	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	NO ARIZONA-SPECIFIC ANNOUNCEMENT, BUT U.S. WEST HAS ANNOUNCED A CORPORATE POLICY TO PROPOSE FREE PER-CALL BLOCKING IN SERVICE AREA.
AR	CONTEL 2/15/91	--	--	--	--	--	YES	NO	NO	--	NO	--	--	--	NO	CONTEL REQUESTED CID SERVICE ON AN INTERIM BASIS. COMMISSION STAFF RECOMMENDED PER-CALL BLOCKING. S.W. BELL'S CORPORATE POLICY IS TO PROPOSED FREE PER-CALL BLOCKING. NO ARKANSAS-SPECIFIC ANNOUNCEMENT YET
CA	PACBELL 11/9/90	--	--	--	--	--	YES	YES	NO	FREE	--	--	--	--	YES	LEGISLATION REQUIRING FREE BLOCKING PASSED IN 1989. THREE BILLS NOW PROPOSED TO REQUIRE FREE PER-CALL BLOCKING AS WELL.
	CONTEL 12/28/90	--	--	--	--	--	YES	YES	NO	FREE	--	--	--	--		
	GENERAL 1/31/91	--	--	--	--	--	YES	YES	NO	FREE	--	--	--	--		
CO	NO	--	--	--	--	--	NO	--	--	--	YES	YES	NO	FREE	NO	U.S. WEST'S CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. FILING EXPECTED LATE 1991 - 1992. CO. HAD ONE TRIAL OF "WHO'S CALLING"--SYNTHESIZED VOICE ANNOUNCEMENT OF NAME OF CALLER.
CT	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	BELL ATLANTIC'S CORPORATE POLICY IS "ALL NUMBER DELIVERY."
DE	DIAMOND STATE 3/2/90	1/91	YES	NO	FREE	NO	--	--	--	--	--	--	--	--	NO	PUC TO MONITOR TECHNOLOGY RE: AUTO-MATIC REJECTION OF UNIDENTIFIED CALLS. ANNUAL REPORTS REQUIRED OF DIAMOND STATE TELEPHONE.
DC	C&P 10/89	1/30/90 & 7/90	YES	NO	FREE	YES	--	--	--	--	--	--	--	--	NO	CHESAPEAKE & POTOMAC (BELL ATLANTIC) OPPOSED BLOCKING. PEOPLE'S COUNSEL FILED APPLICATION FOR RECONSIDERATION ON 3/1/90 BASED ON: VIOLATION OF ELECTRONIC COMMUNICATIONS PRIVACY ACT AND VIOLATION OF C & P NON-PUBLISHED NUMBER TARIFF.

9-6

STATE	CID FILED	CID APPROVED	PER-CALL BLOCK	PER-LINE BLOCK	UNIVERSAL BLOCKING	APPEAL/ NOTION	PROPOSAL PENDING	PER-CALL BLOCK	PER-LINE BLOCK	UNIVERSAL BLOCKING	CID PROPOSAL ANNOUNCED	PER-CALL BLOCK	PER-LINE BLOCK	UNIVERSAL BLOCKING	PROPOSED LEGISLATION	COMMENTS
	GA	BLL	12/4/90	NO	NO	--	YES	--	--	--	--	--	--	--	NO	APPROVED FOR ONE YEAR TRIAL. FREE PER-CALL BLOCKING FOR "AT RISK" GROUPS ONLY. NOTION FOR RECONSIDERATION DENIED.
	GA	BLL	1/12/90													
	HI	NO	--	--	--	--	NO	--	--	--	NO	--	--	--	YES	1991 LEGISLATION REQUIRING ADOPTION OF UNRESTRICTED CID FAILED UPON OPPOSITION BY CONSUMER ADVOCATE, ACLU AND PUC.
	IA	U.S. WEST YES	2/18/91	YES	NO	FREE	NO	--	--	--	--	--	--	--	YES	ACLU LEGISLATIVE PROPOSAL TO GIVE PUC FULL REGULATORY AUTHORITY OVER CID FAILED. U.S. WEST ALLOWED 6 MONTH TRIAL IN MOISE WHILE PUC CONTINUES PRIVACY INVESTIGATION. SERVICE DISCLOSES NAME AND NUMBER. OVER COMPANY OBJECTIONS, LINE BLOCKING AVAILABLE FOR "AT RISK" CUSTOMERS ONLY - RESIDENTIAL AND BUSINESS - UPON DEMONSTRATED RISK OF PERSONAL INJURY. PUC ORDERED U.S. WEST TO LIBERALIZE LINE-BLOCKING POLICY. APPEAL FROM DENIAL OF LINE-BLOCK IS TO PUC.
	IL	BELL	4/29/90	--	--	--	YES	NO	NO	--	--	--	--	--	YES	-BELL (BELL SOUTH) HAS CORPORATE POLICY OF "ALL NUMBER DELIVERY" - OPPOSES UNIVERSAL BLOCKING OF EITHER TYPE. CONTESTED HEARINGS COMPLETED; PUC DECISION EXPECTED 4/18/91.
	IL	CENTRAL	8/6/90	--	--	--	YES	YES	NO	FREE	--	--	--	--		-CENTRAL'S CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING, UNIVERSALLY AVAILABLE.
	IL	UNITED	12/20/90	--	--	--	YES	YES	NO	FREE THEN	--	--	--	--		-UNITED PROPOSES FREE PER-CALL BLOCKING BY SUBSCRIPTION, WHICH WOULD BE FREE ON NEW SERVICE REQUESTS ON DURING FIRST 60 DAYS AFTER TARIFF APPROVED, \$11.00 THEREAFTER. UNITED ALSO PROPOSES A VARIETY OF SPECIAL ARRANGEMENTS FOR LAW ENFORCEMENT AND SOCIAL SERVICE AGENCIES.
	IL	ETE	12/21/90	--	--	--	YES	NO	NO	--	--	--	--	--		-ETE - NO BLOCKING PROPOSED; OTHER ARRANGEMENTS PROPOSED FOR "AT-RISK" GROUPS. -PUBLIC COUNSEL HAS DRAFTED CID/CALL TRACE LEGISLATION TO REQUIRE FREE, UNIVERSAL PER-CALL AND PER-LINE BLOCKING AND TO REQUIRE CALL TRACE WITHOUT PRE-SUBSCRIPTION AT \$1.00/SUCCESSFUL TRACE.

6-9

STATE	CID FILED	PIP APPROVED	PER-CALL BLOCK	PER-LINE BLOCK	FOR BLOCKING	APPEAL/NOTION	PROPOSAL PENDING	PER-CALL BLOCK	PER-LINE BLOCK	FOR BLOCKING	CID PROPOSAL ANNOUNCED	PER-CALL BLOCK	PER-LINE BLOCK	FOR BLOCKING	FILED LEGISLATION	COMMENTS
IL	CENDEL 11/19/90	--	--	--	--	--	YES	YES	NO	FREE	--	--	--	--	YES	LEGISLATION REQUIRING FREE PER-CALL BLOCKING FILED.
IL	TEL. BELL 12/14/90	--	--	--	--	--	YES	NO	NO	--	--	--	--	--	--	UNRESTRICTED CID (AMERITECH'S POLICY) IS BEING STRONGLY CONTESTED.
IN	BELL 5/90	--	--	--	--	--	YES	NO	NO	--	--	--	--	--	NO	BELL REQUEST AWAITING PUC DECISION. STE'S REQUEST TO CONDUCT TRIAL REJECTED DUE TO LACK OF BLOCKING COMPONENT. PUC HAS AUTHORIZED CO. TO REFILE ONLY IF IT OFFERS: UNIVERSAL FREE, PER-CALL BLOCKING; AND UNIVERSAL PER-LINE BLOCKING FOR \$5.00, NON-RECURRING CHARGE; AND CALL TRACE ON DEMAND AT \$1.00/ACTIVATION.
	GTE 3/25/90	NO	--	--	--	--	--	--	--	--	--	--	--	--	--	
IA	NO	--	--	--	--	--	NO	--	--	--	U.S. NEST CENTEL STE CENTEL	YES YES NO NO	NO NO NO NO	FREE FREE -- --	NO	
KS	NO	--	--	--	--	--	NO	--	--	--	YES	YES	NO	FREE	NO	
NY	GTE 4/90	10/8/90	YES	NO	FREE	NO	--	--	--	--	--	--	--	--	--	NO
LA	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	--	NO
NE	NET 10/11/90	11/20/90	YES	NO	FREE	YES	--	--	--	--	--	--	--	--	YES	NEW ENGLAND TEL. HAS ONE YEAR TRIAL. LEGISLATION REQUIRING FREE PER-CALL BLOCKING PROPOSED. NYNEX'S CORPORATE POLICY HAS CHANGED IN SEPT. 1990 TO ONE OF PROPOSING FREE, PER-CALL BLOCKING. "TECHNICAL SOLUTIONS" AVAILABLE FOR "AT-RISK" GROUPS.
ND	CAP 8/31/89	9/21/89 12/90	YES	NO	FREE	YES	--	--	--	--	--	--	--	--	--	INITIALLY WAS NO BLOCKING, BUT ON COMMISSION STAFF'S MOTION FOR RECONSIDERATION, PUC ORDERED FREE PER-CALL BLOCKING. MOTION FOR RECONSIDERATION OF THAT DECISION DENIED. BELL ATLANTIC'S POLICY IS "ALL NUMBER DELIVERY."
ND	NET 1/13/91	--	--	--	--	--	YES	YES	NO	FREE	--	--	--	--	NO	
RI	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	--	

A-8

STATE	CID FILED	CID APPROVED	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	APPEAL/NOTION	LED PROPOSAL PENDING	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	CID PROPOSAL ANNOUNCED	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	PROPOSED/FILED LEGISLATION	COMMENTS
MA	NO	--	--	--	--	--	NO	--	--	--	YES	YES	NO	FREE	NO	
MD	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	
MO	NO	--	--	--	--	--	NO	--	--	--	YES	YES	NO	FREE	NO	SOUTHWESTERN BELL'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING.
MT	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	
NE	U.S. WEST 5/90	9/90	YES	NO	FREE	NO	--	--	--	--	--	--	--	--	NO	APPROVED FOR ONE YEAR TRIAL.
	LINCOLN TL 9/90	10/90	YES	NO	FREE	NO	--	--	--	--	--	--	--	--		
NV	CENTEL 3/90	8/20/90	YES	YES	FREE	NO	--	--	--	--	YES	YES	NO	FREE	NO	PER-LINE BLOCKING AVAILABLE (ONLY) TO ALL RESIDENTIAL CUSTOMERS. BLOCKING IS FREE FOR NEW CUSTOMERS AND FOR EXISTING CUSTOMERS DURING WINDOW PERIOD. PACTEL'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE UNIVERSAL, FREE PER-CALL BLOCKING.
NH	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	NYNEX'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. NET HAS MADE NO NEW HAMPSHIRE SPECIFIC ANNOUNCEMENT.
NJ	N.J. BELL	10/88	NO	NO	--	NO	--	--	--	--	--	--	--	--	NO	BELL: ARRANGEMENTS MADE FOR "AT RISK" AGENCIES ONLY ON A CASE BY CASE BASIS.
	UNITED 5/4/90 9/17/90	8/31/90	NO	NO	--	NO	--	--	--	--	--	--	--	--		UNITED: 1 YEAR EXPERIMENT IN ONE EXCHANGE.
NN	NO	--	--	--	--	--	NO	--	--	--	YES	YES	NO	FREE	NO	U.S. WEST'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO N.H.-SPECIFIC ANNOUNCEMENT, BUT EXPECTATION IS FOR U.S. WEST OFFERING OF UNIVERSAL, FREE PER-CALL AND LIMITED FREE PER-LINE.
NY	N.Y. TEL	NO	--	--	--	--	NO	--	--	--	--	--	--	--	NO	ROCHESTER TEL CONDUCTED A TRIAL WITH FREE, UNIVERSAL PER-CALL AND PER-LINE BLOCKING. P.S.C. DENIED BOTH CO'S TARIFFS ON 3/5/91, DIRECTING THEM TO PROVIDE FREE, UNIVERSAL PER-CALL AND PER-LINE BLOCKING IF THEY RE-FILE.
	DUNSTON	NO	--	--	--	--	NO	--	--	--	--	--	--	--		

1-9

STATE	CID FILE#	CID APPROVED	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	APPEAL/NOTION	CID PROPOSAL PENDING	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	CID PROPOSAL ANNOUNCED	UNIVERSAL PER-CALL BLOCK	UNIVERSAL PER-LINE BLOCK	CHARGE FOR BLOCKING	PROPOSED/FILED LEGISLATION	COMMENTS
NC	SO. BELL 10/20/89	--	--	--	--	--	YES	NO	NO	--	--	--	--	--	NO	BELL (A BELL SOUTH CO.) AGREES TO FREE PER-LINE BLOCKING FOR LAW ENFORCEMENT, NON-PROFIT SOCIAL SERVICE OR INTERVENTION-TYPE AGENCIES AND FOR GOVERNMENTAL AGENCIES. UPON CERTIFICATION BY AGENCY HEAD, PER-LINE BLOCKING WILL BE AVAILABLE FOR AGENCY, EMPLOYEES, VOLUNTEERS AND CLIENTS.
	LEXINGTON 3/19/91	--	--	--	--	--	YES	YES	NO	FREE	--	--	--	--		
ND	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	YES	U.S. WEST'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO N.D.-SPECIFIC ANNOUNCEMENT. PROPOSED LEGISLATION WOULD PROVIDE FREE, PER-CALL BLOCKING.
OH	BELL 3/20/90	--	--	--	--	--	YES	NO	NO	--	NO	--	--	--	NO	ALL HIRE INTERVENORS EITHER OPPOSE OUTRIGHT OR OPPOSE UNLESS BLOCKING OFFERED.
OK	S.W. BELL 1/17/91	--	--	--	--	--	YES	YES	NO	FREE	NO	--	--	--	NO	S.W. BELL REQUESTED ONE YEAR TRIAL FOR ONE EXCHANGE. CORPORATE POLICY IS FREE PER-CALL BLOCKING.
OR	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	YES	LEGISLATION PROPOSED TO REQUIRE FREE BLOCKING.
PA	BELL 1/18/89	11/9/89	NO	NO	--	YES	YES	--	--	--	NO	--	--	--	YES	COMMONWEALTH COURT FOUND CID ILLEGAL ON STATUTORY AND CONSTITUTIONAL GROUNDS. APPEAL PENDING IN PA. SUPREME COURT. BILL INTRODUCED LAST YEAR TO REQUIRE FREE BLOCKING IF CID ALLOWED.
RI	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	
SC	BELL 12/5/89	4/19/90	NO	NO	--	YES	YES	--	--	--	NO	--	--	--	NO	BELL: CONSUMER ADVOCATE APPEALED ON LEGALITY VIS-A-VIS TRAP AND TRACE LAW. NOV. 26, 1990 COURT ORDER FOUND SERVICE TO BE LEGAL; C.A. APPEALED TO SUPREME COURT.
	CHESLEE 1/13/91	--	--	--	--	--	YES	YES	YES	\$2.00 - \$2.50/NO						
SD	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	U.S. WEST'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO S.D.-SPECIFIC ANNOUNCEMENT.
TX	BELL 9/29/89	11/7/87	NO	NO	--	NO	--	--	--	--	NO	--	--	--	NO	

01-0

STATE	CID FILE	CID APPROVED	PER-CALL BLOCK	PER-LINE BLOCK	CHANGE FOR BLOCKING	APPEAL/NOTION	TEL PROPOSAL PENDING	PER-CALL BLOCK	PER-LINE BLOCK	CHANGE FOR BLOCKING	CID PROPOSAL ANNOUNCED	PER-CALL BLOCK	PER-LINE BLOCK	CHANGE FOR BLOCKING	FILED LEGISLATION	COMMENTS
TX	NO	--	--	--	--	--	NO	--	--	--	YES	--	--	--	YES	S.W. BELL'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO TEXAS-SPECIFIC ANNOUNCEMENT. LEGISLATION TO ELIMINATE WIRETAP LAW OBSTACLE TO CID DISCUSSED.
UT	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	NO	U.S. WEST'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO UTAH-SPECIFIC ANNOUNCEMENT YET.
VT	N.E. TEL 3/90	4/90	YES	NO	FREE	YES	--	--	--	--	--	--	--	--	YES	-UNDER CONTINUING INVESTIGATION; HEARINGS HELD MARCH 12-13, 1991. CONSUMER ADVOCATES REQUESTING ADDITION OF UNIVERSAL PER-LINE BLOCKING. -INITIALLY WAS NO BLOCKING; NYNEX CHANGED CORPORATE POLICY IN SEPT., 1990 TO ONE OF FREE PER-CALL BLOCKING. -LEGISLATION PROPOSED WHICH WOULD REQUIRE "FAIR AND EQUITABLE PROVISIONS FOR THE TREATMENT OF CUSTOMER PRIVACY INTERESTS."
VA	C & F 9/1/89	10/1/89	NO	NO	--	NO	--	--	--	--	--	--	--	--	YES	S.B. 181, 1990 SESSION, WOULD HAVE REQUIRED FREE BLOCKING - IT FAILED TO PASS.
	UNITED 8/1/90	9/1/90	NO	NO	--	NO	--	--	--	--	--	--	--	--	--	
WA	NO	--	--	--	--	--	NO	--	--	--	YES	YES	NO	FREE	YES	U.S. WEST'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO WASHINGTON-SPECIFIC ANNOUNCEMENT. P.U.C. HAS ADVISED LEGISLATURE THAT IT WILL REQUIRE GENERAL, FREE PER-CALL BLOCKING. LEGISLATION CONSIDERED TO AMEND TRAP AND TRACE LAW TO ALLOW CID.
NY	C & F 5/89	5/89	NO	NO	--	NO	--	--	--	--	--	--	--	--	NO	
WI	NO	--	--	--	--	--	NO	--	--	--	NO	--	--	--	YES	AMERITECH'S POLICY IS UNRESTRICTED CID. A LEGISLATIVE COMMITTEE ON PRIVACY IS RECOMMENDING: (1) FREE PER-LINE BLOCKING AS THE STANDARD - CUSTOMER HAS TO OPT TO BE UNBLOCKED, AND (2) 'DOUBLE-BLOCKING' - IF CALLER BLOCKS THEN RECIPIENT'S CID DEVICE REFUSES CALL.

A-11

STATE	FILED	CID	UNIVERSAL PER-CALL	UNIVERSAL PER-LINE	CHARGE FOR	APPEAL/NOTICE	CID PROPOSAL PENDING	UNIVERSAL PER-CALL	UNIVERSAL PER-LINE	CHARGE FOR	CID PROPOSAL ANNOUNCED	UNIVERSAL PER-CALL	UNIVERSAL PER-LINE	CHARGE FOR	PROPOSED/FILED LEGISLATION	COMMENTS
-------	-------	-----	--------------------	--------------------	------------	---------------	----------------------	--------------------	--------------------	------------	------------------------	--------------------	--------------------	------------	----------------------------	----------

WY	56						NO				NO				NO	U.S. WEST'S ANNOUNCED CORPORATE POLICY IS TO PROPOSE FREE PER-CALL BLOCKING. THERE IS NO WYOMING-SPECIFIC ANNOUNCEMENT.
----	----	--	--	--	--	--	----	--	--	--	----	--	--	--	----	---

A-12