



United Telephone Company of Florida
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Robert L. McCullers, Jr.
Director - Government/Regulatory Affairs

October 26, 1990

ORIGINAL
FILE COPY

Mr. Steve Tribble
Director, Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Re: Docket No. 891194-TL

Dear Mr. Tribble:

Enclosed please find the original and fifteen copies of United Telephone Company of Florida's Prehearing Statement in the above referenced docket.

A copy of the response has been provided to all Parties of Record.

Sincerely,

Alan N. Berg

ANB:jj

Enclosure

- Mr. Tribble
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]
- Mr. [unclear]

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filing by)
SOUTHERN BELL TELEPHONE AND TELEGRAPH) Docket No. 891194-TL
COMPANY clarifying when a non-published)
number can be disclosed and introducing) Filed: October 26, 1990
caller ID to TouchStar Service)
_____)

PREHEARING STATEMENT
OF
UNITED TELEPHONE COMPANY OF FLORIDA

United Telephone Company of Florida (United) files this Prehearing Statement in response to the Florida Public Service Commission Order No. 23445:

1. United will offer the testimony of W. C. Jones, Jr., Manager-Network Planning and Development, who will testify as to United's position on all non-legal issues identified in this Docket. Mr. Jones' direct testimony was prefiled in this Docket on September 26, 1990.

2. It is anticipated that Mr. Jones will have no exhibits; however, United reserves the right to file exhibits as the need arises.

3. United's basic position on Caller ID is as follows: Caller ID provides substantial benefits to consumers. United plans to file a tariff with the Florida Public Service Commission that will offer Caller ID to United's Customers with the option of having free per-call blocking assigned to their line. This will not be a ubiquitous offering, but will only be provided to those who request the service. Normal service order charges will apply to any request for per-call blocking except during new service requests and during the initial 60 days after the tariff is

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approved when service order charges are waived to promote the ExpressTouch Service. There will not be a disconnect charge. Special considerations for Customers with non-published numbers will not be required since they will be able to request free per-call blocking, just as anyone else.

4. United knows of no questions of fact that it considers at issue, which are not contained in the issues list previously distributed in this Docket.

5. United knows of no questions of law which it considers at issue, which are not contained in the issues list previously distributed in this Docket.

6. United knows of no questions of policy which it considers at issue, which are not contained in the issues list previously distributed in this Docket.

7. United's positions on the issues pending in this Docket, contained in the issues list previously distributed, are attached to this Prehearing Statement as Exhibit "A". United's position is further supported by the prefiled direct testimony by W. C. Jones, Jr.

8. United is not aware of any stipulations reached by the parties.

9. United has no pending motions or other matters in this Docket on which it seeks a ruling from the Commission.

10. United has responded to all requirements of the Order on Prehearing Procedure.

Respectfully submitted,



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Florida Public Service Commission
Docket No. 891194-TL
Exhibit A

Prehearing Statement
of United Telephone Company of Florida

POSITION ON ISSUES

Issue 1: (Informational) For the purposes of this docket, what is the definition of Caller ID?

Response 1: Caller ID essentially has two definitions in today's environment, the first (more of a global term) encompassing the broad scope of passing information about the calling party through the network and the second (more of a specific term) being the actual Caller ID feature provided by Custom Local Area Signaling Service (CLASSSM). In regard to the first definition of Caller ID, this broad form of calling party identity is referred to by United Telephone Company of Florida, Inc. (United) as Calling Party Identification (CPID) information. CPID has been broadly defined and developed within the Information Industry Liaison Committee (IILC) to encompass all forms of calling party identification information, including Caller ID (the feature), which automatically allows the called party to identify the calling party, station, or line. Additional forms of CPID include Automatic Number Identification (ANI), directory numbers, calling party name, calling party address, and personal identification codes. CPID delivery services are made available through such methods as Feature Group D access, Common Channel Signaling System 7 (SS7), Feature Group B access, CLASS, Simplified Message Desk Interface (SMDI), and Integrated Services Digital Network (ISDN).

The Caller ID feature is a subset of CPID. It enables the called Customer to view, via a display unit, the primary telephone number of the calling party who initiated the incoming call. The display unit may be an adjunct device which sits next to the Customer's telephone set or it may be a special telephone set with the display unit built into the telephone.

Caller ID is one of the CLASS features. United plans to file its tariff for the CLASS features under the name of ExpressTouchSM Service. Caller ID will only work on calls which originate and terminate within the CLASS equipped network area.

For the purposes of this docket, both definitions of Caller ID must be considered depending on the issues being addressed. Issues 2, 3, 4, and 5 deal with the broad CPID definition of Caller

ID and the remaining issues are more directed towards the actual Caller ID feature and are answered accordingly.

United believes the differences, but more importantly, the similarities between the CPID and its Caller ID feature subset are important because while the method of providing Caller ID (the feature) is new, the act of sending information about the calling party through the network (CPID) is not new, and has been going on for years. CPID is an essential factor in meeting today's telecommunication needs and should hold no restrictions.

Issue 2: [LEGAL] Is Caller ID a trap and trace device as described in Chapter 934, Florida Statutes?

Response 2: No, Caller ID is not a trap and trace device as described in Chapter 934, Florida Statutes.

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

Response 3: No, Caller ID does not violate any federal law or laws of the State of Florida.

Issue 4: [LEGAL] Does Caller ID violate Florida's Constitution?

Response 4: No, Caller ID does not violate Florida's Constitution.

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

Response 5: The capability to pass information about the calling number through the network provides substantial benefits to consumers. This capability has made new services possible, such as Pay-Per-View TV or the 900/976 services, which use the calling party's telephone number for billing purposes. It has also enabled the telecommunication network to offer worldwide 1+ dialing, making calling around the world almost as easy as calling across town. United recognizes that the passing of this information may sometimes create concerns for those interested in maintaining their anonymity. Reduced calls to hot lines, displaying of non-published numbers, "junk" calls from telemarketing, "redlining" of calls from specific areas, and safety concerns for law enforcement agencies and violence related social service agencies are potential problems being attributed to Caller ID (the feature). With the exception of the law enforcement and/or social agencies, United does not believe these problems with Caller ID will materialize, based on the performance of Caller ID in areas where it is available. While United is not aware of a safety problem which has been caused by

Caller ID, it recognizes the potential hazard and has developed methods to alleviate these problems. The capabilities of Caller ID to reduce harassment, screen calls, aid in emergency situations, enhance security and control over the telephone, and provide a means for many new products are a substantial benefit to the consumer of Caller ID services.

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?

Response 6: Functionality: Caller ID's basic and main function, as proposed by United, is to let the called party know the telephone number of the calling party prior to the called party answering the telephone. None of the other CLASS features, with the exception of Call Selector, can duplicate this functionality. This function by Call Selector is available only when one specific number at any one time is stored in the Call Selector data base. When that number calls, only that one number will ring with a distinctive ring, thereby identifying the specific calling number prior to the Customer answering the telephone.

Benefit: The benefit of Caller ID, as with its functionality, is not shared by the other CLASS features. Caller ID allows the called party to know, even before picking up the telephone, the telephone number of the incoming call. The Customer can use this information in many ways, such as not answering the telephone, deterring further harassing calls, answering according to the incoming number, or automatically pulling up information from a computer data base.

Rate Structure: The rate structure of the existing Commission approved CLASS features for Southern Bell is appropriate and should not be affected by Caller ID. While most of these features share some CPID qualities through the ability to identify the calling number at some point in time, Caller ID provides a unique service of immediately identifying the calling party's number and this has exceptional value to Customers concerned with enhancing their security and control over their telephone service.

Issue 7: What effect will Caller ID have on non-published and unlisted subscribers?

Response 7: Caller ID should not be a problem for these Customers. United is planning to offer free per-call blocking for those Customers who request it. Customers who have non-published numbers recognize the privacy rights of the called party and the value of controlling calls that they receive. Caller ID will give these Customers additional capabilities to control and manage their

telephone and a broad acceptance of this feature is expected by these Customers.

Issue 8: What alternatives to Caller ID blocking are available and do they sufficiently protect customers' anonymity?

Response 8: United can offer quite a few alternatives to the actual blocking of Caller ID which will effectively safeguard the anonymity of the caller if required in special instances. Many of these services are listed below.

Calling Card: United can issue special calling cards to specific Customers who require anonymity when making certain calls. A calling card call is switched outside of the SS7 network and will display an "out of area", or other similar notation, on a Caller ID unit and not the number from which the Customer is calling.

SignalRingSM: SignalRing is a service which is being introduced in early 1991. It allows two or three numbers to be assigned to one telephone line. The primary number of SignalRing is displayed when the caller calls someone with Caller ID. If the called party tried to dial back the displayed number, they could be routed to a United recording or another specified number (such as an answering service) by using call forwarding on the primary number. The second and/or third number of the SignalRing line would not show on a Caller ID unit, thus providing anonymity to the caller. In addition, the second or third number could be non-published.

Outward Only Service: This is a new service that United is reviewing. It will provide the Customer with a telephone line which only allows outgoing calls. Incoming calls are routed to a recording at the central office. Because it is outgoing only, the telephone number of this line would be automatically non-published.

FX Service: This service would allow calls from "undercover" telephones at a single location to appear as if they originated from other parts of the community. It works like any standard FX (foreign exchange) line.

Pay Phone: Calls made from a pay phone could not be attributed to any one person, thereby providing the anonymity required by some persons.

This list of alternatives to blocking of Caller ID does not represent all of the capabilities which exist. United will continue to work with law enforcement groups to determine better, yet reasonable, ways to enhance their operations. It should be realized that any of these blocking methods will only work on the Caller ID (CLASS) feature and not the global Caller ID (CPID).

Calls made by Customers which are subsequently switched to and carried by interexchange carriers (IXCs) can, and will continue to be able to, carry the calling party's telephone number through the network to a Customer of that IXC.

Issue 9: Should the Commission allow or require the blocking of Caller ID? If so, to whom and under what circumstances?

Response 9: United realizes that certain Customers may have legitimate needs for blocking the display of their telephone number to the called party's location.

The Commission should allow the individual Customers to determine whether or not they require the capability to block the forwarding of their Caller ID to the called party on a per-call basis. This per-call blocking should be provided free, with no recurring charges. The Customer should be required to request this service through the normal service order process, just as they would with any other ExpressTouch feature. There would be a normal one-time service order charge with this request except during a new service request or during the initial 60 days following the approved tariff when service order charges for ExpressTouch are waived for promotional purposes. There will be no disconnect fee associated with the per-call blocking service.

Because of the availability of the per-call blocking service, per-line blocking and the associated need to certify those Customers who use it will not be required.

Issue 10: What special arrangements, if any, should be made regarding Caller ID for law enforcement personnel?

Response 10: United is aware that Caller ID will have some impact on law enforcement agencies. The availability of the per-call blocking service should assist in minimizing this impact. To the extent that other methods of blocking are necessary, United will work with these groups to ensure that their concerns are addressed in a reasonable manner. Law enforcement needs are unique and some methods incorporated to maintain their anonymity would not likely be offered to any other person or group. The ultimate goal of United and the law enforcement agencies will be to provide the necessary alternatives to ensure that the safety of their personnel is not jeopardized.

Issue 11: What special arrangements, if any, should be made regarding Caller ID for any other group or groups?

Response 11: The special arrangements for groups such as hot lines or abuse shelters should correspond closely with those alternatives which have been developed for the law enforcement agencies. The alternatives which have been defined in Issue 8, along with the

per-call blocking service option, should provide the protection required by these groups.

Issue 12: Is Caller ID in the public interest?

Response 12: Yes, Caller ID is in the public interest. Whether Caller ID is considered in the broad scope of passing information on the calling party through the network or whether it is considered only as a feature within the CLASS family, Caller ID is a benefit to the public through increased network capabilities and increased security.

Issue 13: What further action should be taken on Southern Bell's tariff filings introducing Caller ID (T-89-507) and changing the conditions under which non-published number information will be divulged (T-90-023)? What should be the effective date of such action?

Response 13: United takes no position on the tariff of Southern Bell, but will seek approval of its own tariff implementing Caller ID with per call blocking on request with no recurring charge. Under the tariff United intends to file Customers will be required to request this service through the normal service order process. There would be a normal one-time service order charge with this request except during a new service request or during the initial 60 days following the approved tariff when service order charges for ExpressTouch are waived for promotional purposes. No disconnect fee will associated with the per-call blocking.

United will continue to work with law enforcement and social agencies to develop appropriate methods of call blocking to accommodate their interests to the extent that per-call blocking does not satisfy these interests.

No special conditions or privileges should be required for customers who have non-published numbers due to the proposed free per-call blocking.

CERTIFICATE OF SERVICE
DOCKET NO. 891194-TI

I HEREBY CERTIFY that a copy of United Telephone Company of Florida's Prehearing Statement has been furnished by U.S. Mail or hand-delivery to the following parties this 26th day of October, 1990:

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