



7

GTE Florida
Incorporated
One Tampa City Center
Post Office Box 110, MC 7
Tampa, Florida 33601-0110
(813) 224-4001
(813) 228-5257 (Facsimile)

ORIGINAL
FILE COPY

James V. Cardeo
Area Vice President - General Counsel

Attorneys
Lorie H. Albeck
Franklin H. Deak
Joe W. Foster
Wayne L. Goodrum
Thomas R. Parker
Leslie Reicin Stein

October 26, 1990

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

Dear Mr. Tribble:

Re: Docket No. 891194-TL
Proposed Tariff Filing by Southern Bell Telephone
and Telegraph Company Clarifying When a Nonpublished
Number Can Be Disclosed and Introducing Caller ID to
Touchstar Service

Please find enclosed the original and 15 copies of GTE
Florida Incorporated's Prehearing Statement for filing in
the above stated matter.

Service has been made as indicated on the attached
Certificate of Service. If there are any questions with
regard to this matter, please contact the undersigned at
(813) 228-3087.

Very truly yours,

Thomas R. Parker

Enclosures

Received & Filed

RECORDS DIVISION

GTE Florida Incorporated
GTE South Incorporated
A part of GTE Corporation

DOCUMENT NUMBER: 09 17

09664 OCT 26 1990

FPSC-RECORDS/REPORTING

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 nonpublished) Filed: 10-26-90
Number can be Disclosed and Introducing)
Caller ID to TouchStar Service)

PREHEARING STATEMENT OF GTE FLORIDA INCORPORATED

Comes now GTE Florida Incorporated (hereinafter "GTEFL") pursuant to the provisions of Commission Rule 25-22.036(3) Fla. Admin. Code and Commission Order No. 23445 issued on September 6, 1990, and submits its Prehearing Statement.

1. Statement of General Position - GTEFL recognizes the substantial social and economic benefits flowing from the rapid development and widespread deployment of CLASS services. Consistent with this principle, GTEFL believes that Caller ID should be made available on virtually all lines. At the same time, GTEFL is sensitive to concerns about Caller ID that have been raised by law enforcement operations and personnel. GTEFL plans to provide Protected Number Service to meet these concerns. In this way, GTEFL can best accommodate those groups with a legitimate need for anonymity, while maintaining the maximum utility of Caller ID services.

2. Witnesses - GTEFL will sponsor two witnesses in this matter. Dr. Sue W. Elseewi will present testimony regarding consumer reactions to Caller ID, while Larry K. Radin will focus on GTEFL's efforts to address law enforcement's

DOCUMENT NUMBER-DATE
09664 OCT 26 1990
FPSC-RECORDS/REPORTING

concerns about the service. GTEFL reserves the right to file and orally present further testimony should any new issues arise in this proceeding that could not be anticipated.

3. Exhibits - The exhibits that have been submitted in this proceeding are listed below.

1. Elseewi Exhibit No. 1
CLASS Pre-Test Study Questionnaire
2. Elseewi Exhibit No. 2
Follow-Up Questionnaire
3. Elseewi Exhibit No. 3
Focus Group Discussion Guide
4. Elseewi Exhibit No. 4
Focus Group Privacy Discussion

GTEFL reserves the right to submit additional exhibits if the need arises.

4. Stipulations and Rulings - GTEFL is not aware of any stipulations between the parties.

5. Motions - GTEFL does not have any motions pending before the Commission in this proceeding.

6. Issues - GTEFL attaches hereto as Appendix A its responses to each issue set forth in the September 6, 1990 Prehearing Order in this proceeding.

Respectfully submitted this 26th day of October, 1990.

JAMES V. CARIDEO
THOMAS R. PARKER
JOE W. FOSTER
WAYNE L. GODDUM

By: 

Thomas R. Parker
Associate General Counsel
GTE Florida Incorporated
Post Office Box 110, MC 7
Tampa, Florida 33601
Telephone: 813-228-3087

Attorneys for
GTE Florida Incorporated

ISSUE 1. For the purposes of this docket, what is the definition of Caller ID?

RESPONSE: Caller ID describes a CLASS service that delivers calling party identification information to the called party's on-premises telephone equipment, which can display that identification information or use it for other identifying purposes. Currently, the calling party identification information delivered is the calling party's telephone number, which can be delivered via either Automatic Number Identification (ANI) or Calling Number Identification (CNI).

ANI, which is provided via a trunk-side connection to the serving central office, has traditionally been used by both exchange carriers and interexchange carriers to identify telephone numbers for billing purposes. ANI is currently provided as part of Feature Group B and D access service. ANI may also be used by interexchange carriers for non-billing purposes and by customers of interexchange carriers and local telephone companies for customer account verification and other purposes. CNI, which is provided via a line-side connection to the serving central office, is a service made available by

deployment of Signaling System 7 ("SS7") to exchange carrier end offices. With SS7, CNI is delivered from the calling party's serving office to the called party's serving office and from the called party's serving office to the called party's telephone equipment. To provide CNI service, the office serving the calling party, the office serving the called party, and the interoffice telephone facilities must be equipped and interconnected with SS7 capability.

In the future, a number of alternative calling party identification methods, such as special coded identifiers or calling party names, may provide substitutes for ANI and CNI, depending on the application.

ISSUE 2. Is Caller ID a trap and trace device as described in Chapter 934, Florida Statutes?

RESPONSE: Caller ID does not fall within the statutory definition of trap and trace device. Fla. Stat. §934.02(21) describes a trap and trace mechanism as "a device which captures the incoming electronic or other impulses which identify the origination number of an instrument or a device

from which a wire or electronic communication was transmitted." In contrast, the intelligence that enables calling number identification services to operate resides in the network itself, rather than in any instrument. Specifically, Caller ID relies upon the ability of the network to switch and transport the calling party's telephone number across the SS7 architecture to the called party's terminating end office switch.

ISSUE 3. Does Caller ID violate any federal laws or any laws of the State of Florida?

RESPONSE: Caller ID does not violate any federal or Florida state laws. The provisions of potential relevance to the legal analysis of Caller ID are the Electronic Communications Privacy Act ("ECPA"), on the federal level; and Chapter 934 of the Florida Statutes, in the state arena. The Florida statutory scheme closely tracks federal law in all respects relevant to the instant inquiry, as it was expressly revised to conform to the ECPA.

As the above response to question 2 explains, calling number identification services, such as Caller ID, cannot be categorized as trap and trace devices under Florida law. Analysis under federal law yields the same conclusion, since the ECPA definition of "trap and trace device," 18 U.S.C.A. §3127(3), is identical to that set forth in Fla. Stat. §934.02(21). Therefore, Caller ID service does not fall within either the state or federal provisions governing interception of communications. Legislative history supports this view, clarifying that these laws were intended to address surreptitious interception only. See, e.g., S. Rep. No. 541, 99th Cong., 2d Sess. 3 (1986).

Even if the Caller ID feature could be considered a trap and trace device, it falls squarely within an exception permitting use of these devices without the court order otherwise required. This exception, found in both the federal and state schemes, allows the installation of a trap and trace device where the consent of the user of the service has been obtained. Fla. Stat. §934.31(2)(c); 18 U.S.C.A.

3121(b)(3). Under the only plausible reading of this provision, the consumer's subscription to Caller ID service necessarily constitutes compliance with the statutory consent requirement.

ISSUE 4. Does Caller ID violate Florida's Constitution?
RESPONSE: Caller ID does not violate Florida's Constitution. Consideration of the privacy issues that have been linked with Caller ID may prompt an examination of Article I, §23 of the Florida Constitution. This section states, in relevant part, that: "Every natural person has the right to be let alone and free from governmental intrusion into his private life except as otherwise provided herein." The language of this section is unambiguous; it is concerned only with governmental intrusions into one's privacy. Caller ID, however, is activated upon the request of the individual subscriber and is utilized as that person chooses. Thus, the service does not violate Florida's constitutional privacy restrictions on government invasions of privacy. On the contrary, Caller ID promotes the constitutionally granted "right to be let alone" because it allows the consumer to accept or reject calls as he chooses.

Even if Caller ID did implicate Article I, §23, one cannot presume that any anonymity interest of the calling party supersedes the privacy interest of the called party. As set forth more fully in the following responses, a subscriber is, at various times, both a called and calling party. This factor must be considered in devising a Caller ID policy that best serves the public interest. Above all, it is essential to remember that the existence of anonymity concerns in no way compels the conclusion that the service should not be offered.

ISSUE 5.

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

RESPONSE:

The benefits of Caller ID and related services are numerous. The service can provide increased privacy protection to residential subscribers, improved law enforcement and public safety capabilities, and opportunities for improved productivity and effectiveness to business customers. For example:

- Residential customers can use Caller ID to protect their privacy interests by screening

calls, prioritizing calls, identifying the source of annoying or obscene telephone calls, and identifying callers who might refuse to identify themselves.

- From a security and public safety perspective, Caller ID can be used not only to identify nuisance or obscene callers, but also to track bomb threats and false fire alarms. Emergency service personnel currently use a type of Caller ID as part of E911-type services, but Caller ID could also improve the effectiveness of law enforcement and other public safety organizations in responding to emergency calls that are not placed via E911. Some states are considering using Caller ID in Telecommunications Device for the Deaf ("TDD") Relay centers so that the information would be available for an emergency or for calls subsequently sent to 911 centers, in addition to its use for billing purposes.

Businesses can use Caller ID in various ways to improve business productivity:

- Businesses can use Caller ID for call distribution. When a call is received by the main number, it can be automatically routed to the appropriate service representative and by automatically cross-referencing the customer's telephone number to appropriate data bases, the customer's account information and profile can be automatically displayed before the call is even answered. This capability yields greater productivity and faster and more accurate responses to consumers' inquiries, since keying errors would be eliminated.

- Businesses such as pizza parlors can use Caller ID to verify phone numbers just as a pizza parlor may verify phone numbers for deliveries to eliminate prank orders and falsified information.

- In some cases, Caller ID may be watched or translated to location data to provide additional applications. A bank, for example, could indicate automatically via a Voice Response Unit to a caller calling from a pay telephone the

location of the closest Automatic Teller Machine.

- Caller ID, coupled with Personal Identification Numbers, passwords, etc., can provide secure access to software or data base services or capabilities. In this case, Caller ID is a network-provided "password" that is safe from tampering, falsification, or theft by unauthorized users.

- For cable television companies, Caller ID can permit verification of accounts, customer telephone numbers, and individual requests for pay-per-view services.

- Caller ID can provide the basis for determining what services have been selected by the incoming caller, allowing the call to be routed to an appropriate program or data base, such as selection of "weather" vs. "sports" from an audiotex service.

- Through association of Caller ID and other customer account status information, incoming

callers' access to certain program or data base services could be blocked if the account is delinquent.

Concerns with respect to Caller ID service have been focused primarily on the loss of anonymity of the calling party. Some parties have expressed concern that Caller ID will compromise the security of police undercover agents. Concerns have also been expressed by some social service organizations (such as "hot lines") that the confidentiality of callers will be compromised and by battered spouse organizations that the location of the battered spouse will be revealed through Caller ID. Some parties believe that telephone numbers for nonpublished customers should not be delivered to the called party. Some have argued that all customers should have a choice about forwarding their number to a third party. While GTE Florida is sensitive to these concerns, as discussed in the responses to the following issues, most of the concerns can be alleviated through existing or future network capabilities.

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:

No existing CLASS service is able to function as an effective substitute for Caller ID. While certain other services offer similar types of advantages, none can provide the set of benefits specific to Caller ID. Perhaps most importantly, no other service can provide the unrestricted call screening function that is the primary distinctive feature of Caller ID. For instance, Call Return stores and redials only the last incoming number, while the Caller ID hardware is able to store multiple numbers. Call Block requires the recipient of an annoyance call from an unknown number to first listen to the call before adding the number to the blocking list. Further, since Call Block will not allow completion of a call from a listed number, the subscriber may not choose to accept a call from that number only in particular instances. Call Tracing Service is a tool for emergency use, rather than a general screening device. It provides legal documentation to aid in prosecuting harassing callers. Since Call Tracing provides no means to stop offensive

calls before the point at which the telephone company is permitted to disconnect service, it lacks the deterrent potential of Caller ID. Moreover, Call Tracing will not be effective in preventing calls which are not obscene, but that a caller does not want to accept such as calls from marketing organizations.

Caller ID has none of these limitations. It gives the customer the freedom to choose how to screen his calls. The customer can choose to answer only calls from familiar numbers, he can answer all calls except those from specific numbers, or he can pick and choose when he will accept or reject calls from unrecognized numbers. In this way, the Caller ID subscriber is provided the optimal ability to be let alone from intrusive telephone calls.

The rate structures that will apply to the GTE CLASS offerings are appropriate and consistent with the particular functions of each service. Each service covers its costs, with rates set on the basis of market considerations and comparisons with other, similar services.

In short, all of the CLASS services are distinct from one another and each is tailored to address a specific demand. GTEFL believes that allowing the consumer to choose the service that best suits his needs is the only course consonant with the public interest.

ISSUE 7.

What effect will the provision of Caller ID have on nonpublished number customers?

RESPONSE:

Nonpublished number services are services that permit a customer to control dissemination of his or her telephone number to the public at large. Any customer subscribing to nonpublished number service should expect that listing information will not to be disclosed to third parties requesting it via directory assistance or in published telephone directories. This service thus can protect the customer's privacy, to a degree, by restricting the availability of the nonpublished subscriber's telephone number to the general public, which might otherwise result in unsolicited and unwanted calls to that subscriber. Nevertheless, nonpublished numbers are still delivered in certain circumstances. For instance, the number will be delivered through

ANI and will appear on the bill of a recipient of a collect call.

The availability of Caller ID in no way affects the ability of nonpublished number service subscribers to restrict the availability of their telephone number to the general public via directory assistance or in published telephone directories. While some parties believe that Caller ID compromises the privacy of non-published customers, the service actually can enhance privacy by increasing the ability of nonpublished subscribers to screen unsolicited and unwanted calls before answering.

Some parties believe that calling number identification for nonpublished customers should not be delivered to the called party, since their telephone number would be made known to the called party. The premise of their position appears to be that the telephone number for these customers should not be disclosed to any third party, even when those customers initiate calls to that third party. In essence, this position is based on the perception that the

privacy rights of the calling party supersede the privacy rights of the called party. In reality, these customers are, at one time or another, both calling and called parties, and the privacy/anonymity issue should be addressed with that reality in mind.

The rights associated with nonpublished number service that preclude disclosure of telephone numbers to the general public should not be equated with any "right" to make anonymous telephone calls. In fact, tariffs have for many years advised customers that as a condition of using their telephone service, their identity must be disclosed to the called party. Required disclosure of actual identity might be considered more personal than mere disclosure of the telephone number assigned by the telephone company. Even so, no legitimate expectation of anonymity currently exists when a call is initiated by them.

A Commission decision that permits nonpublished or any other general class of customers to preclude the delivery of Caller ID to the called

party is tantamount to concluding that the anonymity interests of the calling party are more important than the privacy rights of the called party. Any telephone customer, including a nonpublished one, can be either a called party or a calling party on any given call. Permitting a particular calling party to control Caller ID delivery directly conflicts with the same subscriber's right to receive the calling number.

The broad delivery of calling number identification in conjunction with services such as Caller ID provides these customers with even greater control over incoming calls and would in many ways enhance their privacy.

ISSUE B. What alternatives to Caller ID blocking are available and do they sufficiently protect customers' anonymity?

RESPONSE: Alternatives to Caller ID blocking are available that can provide calling parties some control over delivery of their primary telephone number to the called party. However, GTE Florida questions whether calling parties have the "right to anonymity" implied by this question. Certainly, individuals should have some control

over intrusions into their personal lives, but such control does not suggest that anyone has a right to make anonymous telephone calls. In fact, GTE Florida tariffs and federal and state regulatory rules require that calling parties identify themselves to called parties.

GTE Florida's Protected Number Service ("PNS") can provide the calling party some control over delivery of their primary telephone number to the called party by forwarding a secondary number that, when redialed, provides a long-long ring that can be used to identify calls from individuals who received the number via Caller ID. Legitimate calls using the primary number will trigger a distinctive ring. PNS subscribers therefore can identify calls from parties to which they have voluntarily revealed their primary number and those parties that have received the secondary number via Caller ID. Based on the difference in rings, the PNS subscribers can choose to not answer calls to the secondary number, or to answer them in a special way.

Since operator-handled calls, credit card calls, and coin telephone calls do not deliver an identifying telephone number for Caller ID service, use of these services can permit calling parties to remain anonymous, at least with respect to their telephone numbers. In the future, use of special coded identifiers or calling party names may provide calling parties control over delivery of their telephone number. GTE Florida will support industry efforts to develop such alternative solutions.

ISSUE 9.

Should the Commission allow or require the blocking of Caller ID? If so, to whom and under what rates, terms and conditions?

RESPONSE:

As a general principle, GTE Florida believes that the public interest is best served if some form of calling party identification is delivered to the called party on virtually all telephone calls. A widely-available offering enhances privacy rights in general and, at the same time, promotes the development and deployment of a widely-available advanced telecommunications/information network infrastructure. Any extensive offering of services that block Caller ID delivery will significantly reduce the level of privacy available to residence subscribers,

the utility of Caller ID-based services to business subscribers, and the economic viability of SS7-based services in general.

Some have argued that customers should have a choice about forwarding their number and that blocking is the only viable solution. They believe that callers will no longer be able to control when and to whom they give their telephone numbers, since Caller ID will make the decision for them. They argue that if called parties do not want to receive calls for which the number has been blocked, they have the right not to answer. An analogous argument could be made on behalf of the called party. For example, called parties should have a choice about whether they can see the number of the calling party before they answer. Callers can still control when and to whom they give their telephone numbers, by simply not placing calls to those parties to whom they do not wish their numbers to be delivered. They have the right not to place the call.

The dilemma is that calling parties are also, at one time or another, called parties whose interests may not be best served if the number is blocked. This Commission must, therefore, balance these potentially divergent concerns and develop policy that is in the overall best interest of society.

While GTE Florida believes that the public interest is best served if Caller ID blocking is not made available on a general basis, it is sensitive to the anonymity concerns that have been expressed by various customer groups. GTE Florida will continue to work with these groups to develop solutions to their concerns with Caller ID, and it believes that most of the concerns can be alleviated through existing or future network capabilities, without making Caller ID blocking available on a general basis.

ISSUE 19.

What special arrangements, if any, should be made regarding Caller ID for law enforcement operations and personnel?

RESPONSE:

As stated previously, use of Caller ID by law enforcement operations can greatly enhance some law enforcement capabilities. Caller ID can be

used not only to identify nuisance or obscene callers, but also to track bomb threats and false fire alarms.

Emergency service personnel currently use a type of Caller ID as part of E911-type services, but Caller ID could also improve the effectiveness of law enforcement and other public safety organizations in responding to emergency calls that are not placed via E911.

GTE Florida understands that Caller ID has been opposed by some law enforcement agencies engaged in undercover activities. GTE Florida is sensitive to these concerns and intends to continue to work with these agencies to develop workable solutions to the expressed concerns. GTE Florida believes that its proposed Protected Number Service will provide adequate protection in most situations, while operator-handled calls, credit card calls, and coin telephone calls may be viable solutions in other cases. Caller-activated blocking of Caller ID delivery could also be made available to enhance inaccessibility as required. However, Caller ID blocking does not

control delivery of ANI and no technical means exists to control ANI delivery. PNS avoids problems raised by ANI delivery in that it will not deliver the subscriber's "real" number.

ISSUE 11.

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

RESPONSE:

Protected Number Service could provide number delivery control for police undercover agents, spousal abuse centers, or other special group with justification to control delivery of their "real" telephone number. PNS would provide this control for Caller ID services based on SS7 technology, as well as for ANI-based services.

The concerns of some social service organizations (such as "hot lines") that the confidentiality of callers will be compromised can be addressed by simply not subscribing to the Caller ID service and publicizing that fact.

For others with a special interest in controlling delivery of their number, operator-handled calls, credit card calls, and coin telephone calls may be viable solutions. Calls placed via these methods would provide number delivery

control for Caller ID services based on SS7 technology, as well as for ANI-based services.

For the limited number of subscribers with compelling security concerns, such as authorized violence intervention and law enforcement personnel, limited caller-activated blocking of Caller ID delivery could be made available to enhance inaccessibility as required. However, the Commission should understand that, other than the use of PNS, no technical means exists to control problems associated with ANI delivery.

ISSUE 12.

Is Caller ID in the public interest?

RESPONSE:

Yes, Caller ID is in the public interest. As detailed in the previous responses, the service provides the consumer with a high level of ability to manage and control incoming calls, thereby supporting the Florida state constitutional right to be let alone. Legitimate confidentiality concerns of law enforcement operations and personnel can be satisfied through the use of PNS, out-dial-only lines, or other means.

The public policy question at issue with Caller ID service is not limited to that specific service, but has much broader implications for emerging technologies and economic development. The accelerating evolution of telecommunications and information technologies is thrusting the State of Florida, the United States, and indeed the world, into the Information Age. Continued evolution and convergence of these technologies in the future should yield a wide array of new and innovative services to benefit the consuming public and strengthen the position of the United States in the rapidly developing global economy.

Emerging technologies such as SS7 will have great social and economic benefits, but they also may affect users of telecommunications/information services in previously unanticipated ways, particularly with respect to privacy or anonymity concerns of customers. The Commission should be sensitive to the Caller ID privacy concerns that have been voiced by some, but these concerns should not be overly emphasized at the expense of the privacy rights of

other customers or the broader social and economic benefits that are made available by technological developments. Caution should be exercised when considering possible regulatory rules that may stifle technological developments that are critical to bringing Florida consumers fully into the Information Age. Regulation should be applied only when necessary to address specific, actual privacy abuses and not to discourage the innovation of new technologies that are in the public interest. Such regulation should control the conduct or abuse that gives rise to the concern, and should not attempt to "legislate" technology.

The public interest is best served if Caller ID can be made available to the called party for virtually all telephone calls. Such delivery will enhance the privacy of the called party, contribute to increased public safety, and permit new and innovative services to be brought to the marketplace.

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 nonpublished number information will be divulged (T-90-023)? What should be the effective date of such action?

RESPONSE: Although this proceeding initially focused on specific Southern Bell tariff filings, it was later transformed into a generic examination of Caller ID services. GTEFL will therefore answer this question in the broad sense appropriate to this change in the character of the proceeding.

As explained in the above response to Issue 12, the rapid development and implementation of innovative telecommunications technologies is critically important on both social and economic levels. Advanced services, such as Caller ID, should be made widely available to consumers with the minimum possible delay. GTEFL thus believes that the Commission should permit initiation of Caller ID services on a permanent basis as of March 4, 1991, the date set for issuance of the order in this proceeding. While the service should not be subject to universal blocking requirements, PNS would be offered to law enforcement and other agencies with a legitimate need for anonymity.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Prehearing Statement in Docket No. 891194-TL has been furnished by U.S. mail on this the 26th day of October, 1990, to the parties on the attached list.



Thomas R. Parker

Staff Counsel
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL
32399-0865

Harris R. Anthony
E. Barlow Keener
c/o Marshall M. Criser, III
150 So. Monroe Street
Suite 400
Tallahassee, FL 32301

Alan N. Berg
Senior Attorney
United Tel.Co.of Fla.
P.O. Box 5000
Altamonte Springs, FL
32716-5000

David B. Erwin
Mason, Erwin & Horton, PA
1311-A Paul Russell Rd.
Suite 101
Tallahassee, FL 32301

Michael W. Tye
AT&T Communications, Inc.
Suite 860
315 S. Calhoun Street
Tallahassee, FL 32301

James W. Tyler
Vista-United Tel.
3100 Bonnet Crk.Rd.
P.O. BOX 10180
Lake Buena Vista, FL
32830

Jack Shreve
Office of the Public
Counsel - c/o Florida
House of Representatives
The Capitol
Tallahassee, FL 32399-1300

Cheryl Phoenix, Director
Fla. Coalition Against
Domestic Violence
P.O. Box 532041
Orlando, FL 32853-2041

Thomas E. Wolfe
Southland Tel. Co.
201 S. Pensacola Ave.
P.O. Box 37
Atmore, AL 36504

Lee L. Willis
Ausley, McMullen, McGehee,
Carothers & Proctor
P.O. Box 391
Tallahassee, FL 32302

John H. Vaughan
St. Joseph Tel. & Tel.Co.
502 Fifth Street
Port St. Joe, FL 32456

Lila D. Corbin
Quincy Tel. Co.
107 West Franklin St.
Quincy, FL 32351

John A. Carroll, Jr.
Northeast Fla.Tel.Co.Inc.
130 North Fourth Street
Macclenny, FL 32063-0485

Charles L. Dennis
Indiantown Tel.Sys.Inc.
P.O. Box 277
Indiantown, FL 34956

A. D. Lanier
Gulf Tel. Co.
P.O. Box 1120
Perry, FL 32347

Ferrin Seay
The Florala Tel.Co.Inc.
522 North 5th Street
P.O. Box 186
Florala, AL 36442

Richard H. Brashear
ALLTEL Florida, Inc.
206 White Avenue, S.E.
Live Oak, FL 32060

Glenn W. Mayne, Dir.
Fla. Dpt. of Gen.Svcs
Div. of Communication
2737 Centerview Drive
Knight Bldg, Su. 110
Tallahassee, FL
32399-0950

09664-90