



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

ORIGINAL
FILE COPY

May 13, 1992

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

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' 2nd Motion to Compel.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

- ACK ✓
- AFA 3
- APP _____
- CAF _____
- CMU _____
- CTR _____
- Enclosure
- EAG _____
- LEG 1 w/m
- LIN 6
- OPC _____
- ROH _____
- SEC 1
- WAS _____
- OTH _____

Sincerely,

Charles J. Beck
Deputy Public Counsel

RECEIVED
[Signature]
MAY 13 1992

DOCUMENT NUMBER-DATE

04841 MAY 13 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: May 13, 1992
Bell Telephone & Telegraph Company)
_____)

CITIZENS' SECOND MOTION TO COMPEL

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Florida Public Service Commission to compel BellSouth Telecommunications, Inc., to produce each of the documents responsive to the Citizens' second set of requests for production of documents dated April 3, 1992.

Background

1. On April 3, 1992 the Citizens served 2 requests for production of documents on BellSouth Telecommunications, Inc. and BellSouth Corporation (collectively defined as "BellSouth"). The request further defined the terms "you" and "your" as BellSouth together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting on behalf of BellSouth. BellSouth Telecommunications, Inc., filed its response and objections on

May 8, 1992. It filed a number of general objections and specific objections.

BellSouth Telecommunications' objection to the definition
of "document" or "documents"

2. BellSouth Telecommunications complains about the definition of the terms "document" and "documents," claiming the definition used by the Citizens is overbroad and objectionable pursuant to the standards it claims were adopted by the case of Caribbean Security Systems v. Security Control Systems, Inc., 486 So.2d 654 (Fla 3d DCA 1986). That case, however, makes no findings about a broad definition of the term "documents." The Court found that the specific requests, not the definition of the term "documents," would cause the company to bring its business activities to a halt if it were required to respond to the requests. Caribbean Security Systems at 656.

3. The term "documents" is commonly written broadly so that a respondent couldn't claim, for example, that a document kept as a computer file or as electronic mail on a corporate E-mail system isn't a "document." Florida Rule of Civil Procedure 1.350(a)

itself contains a rather broad definition of the term "document."

4. Moreover, it is particularly incongruous for BellSouth Telecommunications to object to this definition of the term "documents" because it uses virtually the same definition itself in discovery requests it sends to the Office of Public Counsel. See, e.g. Southern Bell's third request for production of documents to the Office of Public Counsel, docket 890256-TL, dated January 29, 1990.

5. There is no merit to BellSouth Telecommunications's objection; it should be rejected.

BellSouth Telecommunications' objection to the definitions
of the terms "you" and "your."

6. BellSouth Telecommunications argues that the terms "you" and "your" attempt to obtain documents in the possession, custody or control of entities that are not parties to this docket, and therefore object to the definition.

7. Discovery is not limited solely to documents in possession of a party. They can also be in the party's control. Parties thus can be requested to produce documents in the hands of their

attorney, insurer, subsidiary, or another person outside the jurisdiction of the forum. Florida Civil Practice Before Trial, §16.56, citing 8 Wright & Miller, Federal Practice and Procedure, §2210. The term "control" is not equated to "possession." Trawick, Florida Practice and Procedure, §16-10 (1982).

8. In fact, Florida Rule of Civil Procedure 1.350(a) itself uses the terms "possession, custody or control." There would be no need to use the word "control" in addition to the word "possession" if it were not intended to reach documents that might not necessarily be in the actual possession of the other party, but subject to that party's "control."

9. The reference by BellSouth Telecommunications to the case of Broward v. Kerr, 454 So.2d 1068 (4th D.C.A. 1984) is misplaced. That case simply stands for the obvious proposition that a party cannot be compelled to respond to interrogatories directed to an ex employee. In appropriate circumstances a party corporation can be compelled to produce documents held by an affiliate. Medivision of East Broward v. HRS, 488 So.2d 886 (Fla. 1st DCA 1986).

10. There are webs of interrelationships between BellSouth Telecommunications and BellSouth Corporation. Attachment 1 is an excerpt from the BellSouth cost allocation manual showing some of these relationships. For example, BellSouth Telecommunications

receives a host of services from BellSouth Corporation on a daily basis, including:

- a. Executive support;
- b. Regional planning services, such as corporate, strategic marketing and technical (including development);
- c. Accounting and tax services such as internal corporate reports, consolidated tax returns, accounting policies rulings and interpretations and internal audit policy;
- d. Financial services, such as securing capital, maintaining investor relations, administering pension fund, preparing consolidated financial reports, providing budget assistance and economic forecasts;
- e. Personnel services related to labor relations, relocation, wages, salaries and assessment;
- f. Legal assistance on taxes, antitrust and federal matters;
- g. Public affairs involving federal regulatory and federal legislative activities;
- h. public relations related to financial advertising and media information; and
- i. Security.¹

11. These services provided by BellSouth Corporation do not come for free. According to the 1991 annual report filed by Southern Bell with this Commission, BellSouth Corporation charged Southern Bell's Florida operations \$29,604,298 during 1991 for these

¹ BellSouth Telecommunications also provides a number of services to BellSouth Corporation on a daily basis, including regulatory support and aircraft.

services. The ratepayers of BellSouth Telecommunications pay for these charges through the rates set by this Commission.

12. There is good reason to believe that BellSouth Corporation has many documents responsive to these two requests for production of documents. The requests ask for documents related to the financial impact and efficiencies resulting from the combination of Southern Bell, South Central Bell, and BellSouth Services. The parent company itself had to be intricately involved with the reorganization of its subsidiaries; Southern Bell alone could not control the reorganization of the affiliates of BellSouth Corporation. Indeed, Southern Bell as a corporation no longer exists; it is succeeded by BellSouth Telecommunications, a company generally comprised of the former Southern Bell, South Central Bell, and BellSouth Services, Inc. And BellSouth Telecommunications has itself put the issue of the reorganization at issue in the case. One of the pro forma adjustments contained in the MFRs filed by BellSouth Telecommunications on May 1, 1992 contains an adjustment for the reorganization.²

² In docket no. 890190-TL the Citizens showed that the reorganization would cost millions of dollars to Florida's intrastate ratepayers by shifting overheads from CPE operations to regulated operations. The Commission found that, because of the recency of the reorganization at that time, there was not enough information available at the time of the hearing to determine whether the costs were appropriately allocated. The Commission determined that the costs of the reorganization should be examined more closely in this proceeding. See order no. 25218 issued October 15, 1991 at 24, 25.

13. The last time the Commission looked at the production of documents from BellSouth Corporation, it turned out that the parent company had a wealth of new information not previously available. In Southern Bell's Caller I.D. docket. docket 891194-TP, the Prehearing Officer ordered BellSouth Corporation to conduct a search for documents in its possession responsive to requests for production of documents. The Prehearing Officer ordered Southern Bell to produce the list of responsive documents.

14. On November 30, 1990 Southern Bell produced the list ordered by the Prehearing Officer and identified 180 responsive documents in the possession of BellSouth Corporation. A copy of Southern Bell's letter is attached to this motion as attachment 2. Some of the documents were copies of documents previously provided by Southern Bell, but most were documents never before provided. The documents, provided after the conclusion of evidentiary hearings, contained a host of new information concerning issues in that docket. If the parent had such information available about Caller I.D., then surely it would have important information about the reorganization of Southern Bell itself into a new company having new relationships with new affiliates.

15. Section 364.183, Florida Statutes (1991) specifically provides the Commission access to all company records, and the records of the telecommunications company's affiliated companies,

including its parent company, regarding transactions or cost allocations among the telecommunications company and its affiliates. The documents sought by the Citizens easily fit this criteria for access. The documents sought by the Citizens concern a reorganization with affiliates and relate to an issue the Commission previously directed to be examined in this docket.

16. Further, for the purpose of responding to requests for production of documents in this case, BellSouth Telecommunications acts as one with BellSouth Corporation. Under the standard enunciated in Medivision of East Broward, Inc., v. H.R.S., 488 So.2d 886 (Fla. 1st DCA 1986), it is entirely appropriate to include BellSouth Corporation as a corporation required to respond to requests for production of documents. Indeed, the tie between Southern Bell and BellSouth Corporation is a much stronger tie than the one reviewed by the Court in Medivision. Here, the operations of the parent corporation BellSouth Corporation are actually financed in large part by charges passed through by BellSouth Telecommunications to its monopoly ratepayers. This is a unique circumstance not present in the Medivision case. Medivision had no such opportunity to recover the operational costs of the parent corporation and the subsidiary corporation from monopoly ratepayers.

17. Finally, BellSouth Telecommunications objects because it claims the two requests are so overly broad and vague that it

cannot produce, with any reasonable certainty, each responsive document.

18. The two requests for documents are as follows:

- a. Please provide each document in your possession, custody or control which evaluates the financial impact of, or otherwise evaluates or comments on, the combination of Southern Bell, South Central Bell, and BellSouth Services.
- b. Please provide each document in your possession, custody or control which evaluates or comments on the efficiencies which would or might result from the combination of Southern Bell, South Central Bell, and BellSouth Services.

19. BellSouth Telecommunications ignores the instruction provided in the request which places limits on the search. Instruction number six in the request stated that "the Citizens specifically request the company to make a review of the files of employees reasonably expected to have information responsive to these document requests. Correspondence and notes of meetings, whether typed or handwritten, are specifically requested. If a particular employee is in charge of an area related to a document request, the Citizens request the company to search the files


both of the employee in charge of the area as well as each employee reporting directly or indirectly to such person if their areas of responsibility also include matters reasonably likely to be responsive to the document request."

20. There is nothing overbroad about the search requested. BellSouth Telecommunications can comply by limiting the search to its employees and the employees of BellSouth Corporation who are reasonably expected to have information responsive to these document requests, as well as subordinates whose areas of responsibility also include matters reasonably likely to be responsive to the document requests.

WHEREFORE, the Citizens respectfully request the Florida Public Service Commission to compel BellSouth Telecommunications, Inc., to produce each of the documents responsive to the Citizens' second set of requests for production of documents dated April 3, 1992, including those responsive documents in the possession, custody or control of the parent company BellSouth Corporation.

Respectfully submitted,

Jack Shreve
Public Counsel


Charles J. Beck
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

(904) 488-9330

Attorneys for the Citizens of
the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 13th day of May, 1992.

Marshall Criser, III
Southern Bell Telephone and
Telegraph Company
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Harris B. Anthony
Southern Bell
150 W. Flagler St., Suite 1910
Miami, FL 33130

Robin Norton
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Doug Lackey
Southern Bell
4300 Southern Bell Center
Atlanta, GA 30375

Mike Twomey
Department of Legal Affairs
Attorney General
The Capitol Bldg., 16th Floor
Tallahassee, FL 32399-1050

Rick Wright
AFAD
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

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

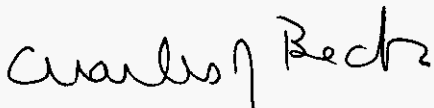
Edward Paschall
Florida AARP Capital City Task
Force
1923 Atapha Nene
Tallahassee, FL 32301

Fla. Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Charlotte Brayer
275 John Knox Rd., EE 102
Tallahassee, FL 32303

Richard D. Melson
Hopping, Boyd, Green & Sams
23 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314

Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, GA 30346


Charles J. Beck
Deputy Public Counsel

A STATEMENT OF AFFILIATES
ENGAGING IN TRANSACTIONS WITH THE
CARRIER ENTITIES

BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. (BST) is a regulated carrier which provides a variety of local exchange and interexchange services to customers in areas of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee. BST supplies long distance service within its court-defined calling zones. BST also provides access to the networks of long distance companies that offer service between BST calling zones and from state-to-state.

TRANSACTIONS WITH AFFILIATES

All services and supplies provided to or received from each affiliate, the frequency each is provided and the applicable affiliate transaction rule that will be used to determine the amount recorded on the regulated books of BST are listed below. In addition to the affiliates listed below, BST provides telecommunications services at tariffed rates to all affiliates with offices located in their service areas.

BELLSOUTH CORPORATION

BellSouth Corporation (BSC) is the parent corporation of BST, as well as various nonregulated subsidiaries engaged in businesses other than the provision of regulated local exchange service.

SERVICES PROVIDED TO BSC

<u>DESCRIPTION OF SERVICES</u>	<u>FREQUENCY</u>	<u>AFFILIATE RULE</u>
° Telecommunications services including official communications	Daily	Tariffed Rates
° Shared office space and security for buildings and support services	Daily	SEC. 64.901 Costing Standards
° Legal & medical services	On Request	SEC. 64.901 Costing Standards
° Use and maintenance of general purpose computer systems	On Request	SEC. 64.901 Costing Standards
° Aircraft	Daily	SEC. 64.901 Costing Standards
° Procurement and Provisioning services	Daily	Sec. 64.901 Costing Standards

SERVICES PROVIDED TO BSC (CON'T)

<u>DESCRIPTION OF SERVICES</u>	<u>FREQUENCY</u>	<u>AFFILIATE RULE</u>
◦ Regulatory Support	Daily	SEC. 64.901 Costing Standards
◦ Procurement and Management of Bellcore services	Daily	SEC. 64.901 Costing Standards
◦ Human Resources	Daily	SEC. 64.901 Costing Standards
◦ Production of Corporate videos	On Request	SEC. 64.901 Costing Standards
◦ Personnel Services	On Request	SEC. 64.901 Costing Standards
◦ Training	On Request	SEC. 64.901 Costing Standards
◦ Teleconferencing	On Request	SEC. 64.901 Costing Standards
◦ Corporate TV	On Request	Sec. 64.901 Costing Standards

SERVICES RECEIVED FROM BSC

<u>DESCRIPTION OF SERVICES</u>	<u>FREQUENCY</u>	<u>AFFILIATE RULE</u>
◦ Financial services, such as, securing capital, maintaining investor relations, administering pension fund, preparing consolidated financial reports, providing budget assistance and economic forecasts	Daily	SEC. 64.901 Costing Standards
◦ Regional planning services such as corporate, strategic marketing and technical (including development)	Daily	SEC. 64.901 Costing Standards
◦ Personnel services related to labor relations, relocation, wages, salaries and assessment	Daily	SEC. 64.901 Costing Standards
◦ Legal assistance on taxes, antitrust and federal matters	Daily	SEC. 64.901 Costing Standards

SERVICES RECEIVED FROM BSC (CON'T)

<u>DESCRIPTION OF SERVICES</u>	<u>FREQUENCY</u>	<u>AFFILIATE RULE</u>
° Public affairs involving federal regulatory and federal legislative activities	Daily	SEC. 64.901 Costing Standards
° Public relations related to financial advertising and media information	Daily	SEC. 64.901 Costing Standards
° Accounting and tax services such as internal corporate reports, consolidated tax returns, accounting policies rulings and interpretations and internal audit policy	Daily	SEC. 64.901 Costing Standards
° Executive Support	Daily	SEC. 64.901 Costing Standards
° Security	Daily	SEC. 64.901 Costing Standards

BELLSOUTH PRODUCTS

BellSouth Products (BSP) is a wholly owned subsidiary of BellSouth Telecommunications which sells single line telephone sets and associated products to retail distributors.

SERVICES PROVIDED TO BSP

<u>DESCRIPTION OF SERVICES</u>	<u>FREQUENCY</u>	<u>AFFILIATE RULE</u>
° Billing and Maintenance of Customer Accounts	Daily	SEC. 64.901 Costing Standards
° Marketing Support	Daily	SEC. 64.901 Costing Standards
° Legal Support	Daily	SEC. 64.901 Costing Standards
° Treasury and Accounting Support	Daily	SEC. 64.901 Costing Standards
° Telecommunications Services including official communications	Daily	Tariffed Rates

David M. Faigoust
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 4300 - Legal Department
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
404 529-3865

BY HAND DELIVERY

November 30, 1990

Mr. Charles J. Beck
Associate Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Re: FPSC Docket No. 891194-TL

Dear Charlie:

Pursuant to Commissioner Easley's oral order of November 28, 1990, Southern Bell has requested BellSouth Corporation to conduct a search for documents in its possession which would be responsive to those parts of Citizens' First Request for Production of Documents to which Commissioner Easley's order applied and to Citizens' Second Request for Production of Documents.

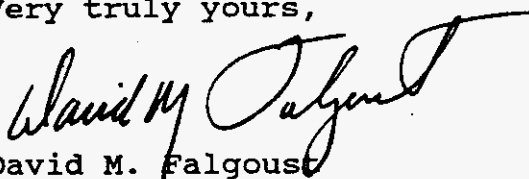
BellSouth Corporation has advised me that it has conducted such a search on a department-by-department basis. As a result of that search, BellSouth Corporation has this date delivered 180 documents, consisting of several hundred pages, to my office. The attached list describes each of the documents produced by BellSouth Corporation. Many of these documents appear to be duplicates of what has already been produced to you. They are all available, however, for your immediate review at my office. If you prefer, I will have them transported to Southern Bell's executive offices in Tallahassee for your inspection.

In addition, there are several documents which may be responsive to your requests with respect to which BellSouth Corporation has asserted attorney-client privilege. Those documents are identified and described in a memorandum dated November 30, 1990 from Bill Barfield to R. Douglas Lackey, a copy of which is also attached to this letter.

All of the documents referred to above are the result of as complete and thorough a search as BellSouth Corporation has been able to conduct in a forty-eight hour period. Of course, if any additional responsive documents are discovered, you will be so notified.

Please advise me at your earliest convenience whether you wish me to deliver the BellSouth Corporation documents to Tallahassee for your review.

Very truly yours,



David M. Falgoust

Enclosures

cc: H. R. Anthony
A. M. Lombardo
R. D. Lackey

LIST OF DOCUMENTS
PRODUCED BY BELLSOUTH CORPORATION

1. Issue NTWC 024 CPID Privacy/Anonymity
- Meeting Minutes
- Issues of Caller ID
2. Communication Daily
3. Plaintiff's Memorandum of Law
Southern Bell Telephone & Telegraph Company's Brief
Cellular ID Case
4. Plaintiff's Reply to Amended Brief of Steven W. Hamm and the
South Carolina Department of Consumer Affairs
5. Amended Brief of Steven W. Hamm and the South Carolina
Department of Consumer Affairs
6. Memo dated 8/2/90 to Tom Hamby and Jack Lightle from Ernest
Bush re: U. S. Senate testimony on Caller ID
Attached - Draft of "Written Statement of BellSouth
Corporation
7. Response of Southern Bell to the Motion of the Attorney
General to Allow Caller ID only with free blocking to all
Subscribers - North Carolina Caller ID Docket
8. PA - PUC - Statement of Commissioner Joseph Rhodes, Tr.
Re: Caller ID
9. Opinion and Order of PA PUC
Re: Caller ID
10. Memo dated 8/13/90 to ROC Members, PMC Members, etc. from
Sidney J. White Re: Florida Public Counsel's Interrogatory
and Production of Document Requests
11. Sociological Perspectives on Caller ID Privacy
12. Caller ID, ANI and Privacy Conference
Draft Carlton Baker
Presentation Outline
13. Calling Number Identification Position Dated 10/22/90

14. Caller ID - A Status Report on BellSouth Dated 9/5/90
15. Media questions and answers Re: Caller ID
16. Caller ID - Stakeholder Communications Plan
17. Caller ID Tariffs Release Date 10/19/89
18. Caller ID - Tennessee TouchStar Dated 2/27/90
19. Caller ID Survey at University of Georgia
Cover Letter from Dennis Betz
Letter from Scott Shamp - UGA
UGA Caller ID Research Report
20. National Consumer Tracking Survey - June 1990
21. Policy and Issues Climate for the Exchange Telephone
Industry - "The Stakeholder Study" August 1990
22. Uniform Provision of Calling Number Identification
Dated 2/24/89
23. Final draft of CPID Privacy/Anonymity Paper
24. IICL Position Paper on The Issue of Calling Card
Identification Privacy/Anonymity 2/22/90
25. FCC - Petition for Rulemaking Re: Calling Number Delivery
26. Memo dated 7-5-90 from Don Davis
Re: Establishment of FCC Docket Team to Address Privacy
Petition of Joseph Baer
27. Caller ID Service and the Privacy Issue: Preliminary
Analysis of the Baer Petition of the FCC - Dated 3/29/90
28. TouchStar Product Team
29. BellCore's Technical & Regulatory Analysis of Joseph Baer's
Petition Re: Calling Number Delivery
Attached: Baer Petition Technical Regulatory Analysis
30. Comments of Rochester Telephone Corporation
Re: Calling Number Delivery
31. Calling Number Delivery, The Privacy Issue - A Position
Paper - 10/88
32. Cover Letter from Don Davis Dated 8/6/90
Re: First Draft of BellSouth's Comments in Response to
Baer's Petition for Rulemaking Regarding Caller ID Service

(Document not attached due to assertion of attorney-client privilege)

33. Letter dated 6/29/90 to N.Y. Commission from Joel R. Shapiro
Re: ANI Controversy with Attached Letter Dated 7/10/90 to
FCC from Roger A. Browning of Grassman & Browning
34. Bulk Calling Line Identification Local Area Signaling
Services Feature Document IAESS™ Switch - July, 1985
35. ANI/UAN/CSA PMT - March 8, 1989 Agenda
36. Letter dated October 3, 1989 from Gary Dennis to Donna
Searcy of FCC Re: Filing and Review of Open Network
Architecture Plan
37. Letter dated 10/16/89 from T. L. Hamby to ONA Steering
Committee Re: Bulk Calling Line Identification
38. Cover Letter dated 4/19/90 from Michael Leeper with
attachment - Network CNI Control Techniques and Capabilities
Dated 2/22/90
39. Cover Letter dated 8/2/90 from Don Davis with attachment
U.S. Senate Testimony on Caller ID
40. Caller ID - Automatic Telephone Number Identification -
Updated 5/18/90
41. FAX Coversheet to Tom Rawls
Attachment - Memo dated 8/6/90 from Gary J. Dennis
Re: Caller ID
42. Caller Identification and the Constitution by Martin H.
Redish, April 1990
43. Cover Letter dated Sept. 5, 1990 from Don Davis
Re: BellSouth Senate Testimony on Caller ID. Attachment
Cover Letter dated 8/29/90 from Lynn R. Holmes with attached
copy of written statement of BellSouth Corporation re:
Hearing on The Telephone Privacy Act of 1990 dated 8/31/90
44. Appendix A, Fla. Public Service Commission, Report From:
The Law Enforcement Committee on Caller ID Findings and
Recommendations
45. Transcript for Caller ID Agenda Dated 4/2/90
46. Advanced Intelligent Network Release 0 Business Case March,
1990
47. Intelligent Network Services and Technology Deployment Plan

(1988-1998)

- 48. Residence Market Plan - 1987
- 49. Graph - Southern Bell TouchStar Revenues

SECURITY DOCUMENTS

- 50. Letter dated September 20, 1989 to Don Strohmeier from P. H. Casey Re: Touchstar - Call Trace/Caller ID Features
- 51. Touchstar Features
- 52. Cover Note from Robert Freedman with article attached - The Business of Fighting Crime
- 53. Letter dated 2/20/90 from C. D. Hathcock to Nathaniel Carpenter
- 54. Attachment D - S. 2030
- 55. Cover Letter with Attachment - Submission of teh 024-NTWC Task Group to the Non-Technical Working Committee of the IILC on the Issue of Calling Party Identification Privacy/Anonymity
- 56. Bill Insert Draft
- 57. Florida Public Service Commission - Vote Sheet, 2/20/90
Re: Caller ID
- 58. Memo from W. J. Schultz to J. R. Monk Re: New Jersey Bell ACC Case Reductions -
Attached Article: Bill Would Curb Disclosure of Phone Caller's Number
- 59. Handwritten note from Bill to Tim
- 60. Memo to Tim Monk from Bill Reed Re: Touchstar Implementation
- 61. Caller Identification (Caller ID) Stakeholder Communications Plan
- 62. Cover note dated 4/25/90 from M.E. Cox, Attached Letter dated 4/16/90 from M. J. Franklin to AVP - Public Affairs
Re: Call to Higher Management
- 63. Transcript for Caller ID Agenda - April 2, 1990
- 64. Letter dated 6/22/90 from W. J. Schultz to T. R. Monk
Re: Caller ID Program in Alabama
- 65. Letter dated 6/14/90 from T. H. Lane to M. E. Cox

Re: TouchStar/Caller ID Stakeholder Effort in Alabama
G.O. File 19-00

66. Cover note - handwritten with Attached - Reply of Southern Bell to the Attorney General Opinion Regarding Caller ID - North Carolina Docket P-55, Sub 925
67. Cover letter dated 9/3/90 Re: Caller ID Results in New Jersey
68. Class Calling Service Six Month Report for Period 11/1/89 - 4/30/90
69. Class Calling Service Six Month Report for the period May 1 through October 31, 1989
70. BellSouth Security Routing Slip dated 12/11/89 to W. J. Schultz with attached handwritten letter dated 12/11/89 to Bill Schultz from Tim Monk Re: White Paper - Touchstar/Call Trace Feature
71. Cover note from M. E. Cox with Attached Presentation made to C.M.O.C. - 6/11/90
72. TouchStar Implementation Meeting Minutes - Atlanta 6/11/90
73. Touchstar Implementation Team Meeting Minutes, Atlanta, Ga. July 23, 1990
74. Meeting Minutes ICO/911 Subcommittee (Call Trace Procedures Committee), Sept. 13, 1990
75. Cover note dated 7/23/90 to W. J. Schultz with attached letter dated 7/17/90 from M. E. Cox to Patricia J. Meyers Re: Request from Sales Leads Referral Program with Security
76. Touchstar Implementation Meeting Minutes - Atlanta, Ga. September 10, 1990
77. BellSouth Call Tracing TeleConference
78. Letter dated 4/23/90 from D. L. Strohmeier
Re: Call Tracing Support and Enhancement
79. Letter dated April 9, 1990 from Will Hendrick to Stan Washer
Re: Mechanization of Caller ID Message
80. Memo dated 7/31/90 from W. J. Schultz to J. R. Monk
Re: Report on Call Tracing Focus Group Meeting. Report Attached
81. Fax Sheet to Bill Schultz from Gerald Barger dated 5/4/90

Attached Memo dated 5/3/90 to P. H. Casey and L. L. Schoolar
(Draft) Re: Status Report for North Sector and South Sector
Annoyance Call Centers

82. Memo dated 3/20/90 from D. A. Wallace to W. J. Schultz
Re: Call Tracing
83. Letter dated 5/14/90 from Janie Yarbrough to Bill Tyler
Re: Alabama Cost Study Inputs
84. Handwritten Letter to Bill Reed Dated 8/22/89
85. Letter dated 11/2/89 from D. L. Strohmeier to P. H. Casey
Re: Touchstar® Service - Call Tracing/Caller ID
86. Cover note to Pat from Joe Schmidt - Attached letter dated
10/20/89 to Patricia Donald - Re: Annoyance Call Center
87. TouchStar Implementation Meeting, Atlanta, Ga. -
November 6, 1989 Minutes
88. Letter dated 11/2/89 from D. L. Strohmeier to P. H. Casey
Re: Touchstar® Service - Call Tracing/Caller ID
89. Fax Cover Sheet to Bill Reed with attached memo dated
11/14/89 from Noel Spicer - Re: Caller ID Bill Insert Copy
Review
90. TouchStar Implementation Meeting - Atlanta - January 8, 1990
91. TouchStar Service Implementation Team - Atlanta Meeting
July 5, 1989
92. TouchStar Implementation Meeting, Atlanta, Georgia
November 6, 1989 Minutes
93. TouchStar Implementation Meeting - Atlanta, Georgia
December 4, 1989
94. TouchStar Service Implementation Team Meeting - Atlanta
December 4, 1989
95. Meeting Notice dated November 4, 1989 Touchstar®
Implementation Team
96. TouchStar Service Implementation Team Meeting - Atlanta
8/7/89
97. BellSouth Services TouchStar Implementation Meeting
Birmingham, - 8/16/89
98. TouchStar Service Implementation Team Meeting -

Atlanta-9/5/89

99. TouchStar® Implementation Meeting Minutes - Atlanta
10/2/89
100. Meeting Minutes TouchStar Implementation Team
Birmingham - 10/18/89
101. BellSouth Routing Slip to W. J. Schultz
Attached Touchstar Implementation Meeting - Atlanta
12/4/89
102. Fax sheet to Bill Reed dated 7/5/89 Draft - Calling Number
Delivery Anonymity Protection Options 7/5/89
103. Section A.13 Florida General Subscriber Service Tariff
104. Letter dated 9/6/89 from T. H. Lane to M. E. Cox
Re: TouchStar Call Trace
105. Chart of handwritten numbers - Group 1 Group 15
Total In - Total Outgoing
106. Handwritten figures - August 1988, 1989
107. Letter dated 9/19/89 from T. H. Lane to M. E. Cox
Re: TouchStar Call Trace Problems G. O. File 19-00
108. Letter dated 9/8/89 from J. R. Monk to J. L. Schmidt
Re: Call Trace
109. Letter dated 12/12/89 from Terry Lane to Janet Bernstein
Re: Caller ID
110. Letter dated 11/7/89 from Richard Browne to J. R. Monk
Re: Should BS release "N & A"
111. Annoyance Call Center Conference Feb. 1 & 2, 1990 Agenda
112. Memo dated 5/9/89 from J. R. Monk to M. E. Cox
Re: TouchStar Caller ID
113. Handwritten note dated 5/8/89 from Bill R. to Tim
Re: TouchStar/Call I.D.
114. Letter dated 3/27/89 to Departmental TouchStar Stakeholder
Liaisons from J. C. Edwards with Tutorial explaining new
TouchStar® Service Feature - Caller ID
115. Letter dated 4/19/89 from J. R. Monk to J. L. Schmidt
Re: TouchStar Caller ID

116. Meeting Minutes Caller ID Stakeholder Communications Update - October 11, 1989
117. Cover note dated 10/16/89 from Clark Stone with attached letter dated 4/28/89 to J. L. Schmidt Re: Touchstar "Caller ID" and Law Enforcement Contact List
118. Letter dated 6/22/89 from Clark Stone to J. R. Monk Re: TouchStar "Caller ID" with TouchStar "Caller ID" Law Enforcement Contact List
119. Letter dated 5/9/89 from Clark Stone to J. R. Monk Re: TouchStar "Caller ID"
120. Memo dated 6/30/89 to Caller ID Stakeholder Communications Committee - Re: Final Concurrence
121. Meeting Notice dated 10/11/89 Caller ID Stakeholder Communications Update
122. Caller ID Communications Plan
123. Caller ID Communications Plan - Dated 6/7/89
124. Caller ID Communications Plan - Dated 6/1/89
125. Memo dated 6/14/89 from Kathy Seabolt to J. C. Edwards Re: Caller ID Communications Plan
126. South Bell Telephone Implementation Team Meeting - June 5, 1989
127. Caller ID Communications Plan Meeting Agenda dated June 21, 1989
128. Caller ID Communications Plan General Statement - (Draft 6/21/89)
129. Caller ID Communications Plan Draft - Dated 6/7/89
130. Letter dated 7/14/89 from Don Davis to Bill Reed Re: Anonymity Protection Options Associated with Caller ID
131. Meeting Notice dated June 21, 1989 Caller ID Communications Plan
132. Letter dated 9/14/89 from J. R. Monk to M. E. Cox Re: Caller ID
133. Memo dated 5/4/90 from Vic Beninate Re: Caller ID Implementation Meeting

134. Letter dated 2/2/90 from N. C. Department of Justice to Kelli Johnson Re: Caller ID Docket
135. Letter dated 5/30/90 from Robert Freedman to Charles Dunn
136. Cover note from Robert Freedman attached - Crime Control Digest
137. Letter dated Jan. 9, 1990 to N. C. Utilities Commission from Hoyle B. Adams Re: Southern Bell's Caller ID Docket
138. Letter dated 1/26/90 from Nicholas E. Viaservich to Mr. William Redman N. C. Utilities Commission Re: Caller ID
139. Letter dated 2/5/90 from Ann Zook Sandler to William Redman Re: Caller ID
140. Unsigned Letter from Elizabeth Quattlebaum to Mr. William Redman
141. Letter dated 2/5/90 from Gloria Potts to William Redman
142. Letter dated 2/7/90 from C. Adams to W. Redman
143. Letter dated 12/16/90 from Philip Avolponi to N. C. Utilities Commission
144. Letter dated 2/16/90 from Rob Mills to Jim Redman
145. Letter dated 2/16/90 from Y. Johnston to N.C. Utilities Commission
146. Letter dated 2/16/90 from Terry Young to N.C. Utilities Commission
147. Letter dated 2/16/90 from Stacie Gates to "Dear Sir"
148. Letter dated 2/13/90 from Stephen Wellons to William Redman
149. Correspondence to the N.C. Utilities Commission
150. Letter dated 2/5/90 from Ann Zook Sandler to Don Sanders
151. Letter dated 1/12/90 from JoAnn Sanford to Chief of Police - Mechenberg County, N.C.
152. Cover Memo from Roxie Moore Attached - Correspondence to N. C. Utilities Commission - Re: Caller ID
153. Letter dated 3/19/90 from J. C. Edwards
Re: Caller ID Anonymity Options for Florida Law Enforcement, Revision on March 19 to remove DISA

154. Access to Office Services, Away from the Office
155. Caller Id
156. Fax sheet to Maria Martinez dated 2/26 - Attached: Back to Back Trunking Costs
157. Caller ID Diversion Scenarios
158. South Miami Central Office (66)
159. Cover sheet to Bill Schultz - Attached memo dated 4/25/90 from General Security Manager - Garrett
160. Telecommunications Week, Feb. 19, 1990 Vol. 8, No. 7
161. Caller ID Meeting with Law Enforcement, 2/27/90
162. Memo dated 2/23/90 from Vic Beninate to Tony Lombardo
Re: Caller ID
163. Cover sheet to Mario Martinez attached memo to Marshall Criser dated 2/15/90 from Gary Allington Re: Summary of Meeting with BAFT
164. Caller ID Meeting - PSC Room 627 - 2/20/90
165. Caller ID Task Force Meeting No. 1 - 2/26/90
166. Letter dated 5/7/90 to D. L. Strohmeyer from P. H. Casey
Re: Florida Caller ID
167. Cover sheet to Bill Schultz, Attached Caller ID Enforcement Project - Florida
168. Memo dated 5/1.90 to J. R. Monk from W. J. Schultz -
Re: Caller ID Law Enforcement Project - Florida
169. Letter dated 4/17/90 from W. J. Schultz to J. R. Monk
Re: Caller Id Project - Florida
170. Memo dated 3/21/90 from W. J. Schultz to J. R. Monk
Re: Caller ID Project - Florida
171. Memo dated 4/27/90 from W. J. Schultz to J. R. Monk -
Re: Caller ID Project - N.C. Meeting 3/16/90
172. Letter dated 4/24/90 from Strohmeyer to Ackerman
Re: Caller ID Law Enforcement Project - Florida
173. Tuesday, April 17, 1990 Handwritten Committee List

174. Memo dated 3/5/90 from Monk to Cox & Schmidt
Re: Caller ID - Law Enforcement Liaison
175. Memo dated 3/20/90 from Mario Martinez - Re: Caller ID
176. Memo dated 2/22/90 from Mario Martinez - Re: Caller ID
177. Memo dated 3/7/90 from Schultz to Monk
Re: Caller ID Project
178. Memo dated 3/21/90 from Schultz to Monk
Re: Caller ID Project - Florida
179. March 6 - Committee List (Handwritten)
180. Staff Recommendation, FPSC Feb. 13, 1990
Re: Docket 891194-TL Caller ID
Issue and Recommendation Summary

November 30, 1990

MEMO TO: Mr. R. Douglas Lackey

FROM: William B. Barfield *WBB*

RE: Request for Production of Documents
in Florida Caller ID Proceeding

I have reviewed the BellSouth Corporation Legal Department files for documents which might be responsive to Public Counsel's Request to Produce. The non-privilege materials have been provided to Gary Grace.

In addition to those materials, I have in my file an undated memo from Gail F. Barber to Bill Barfield received October 16, 1989, and attaching a memorandum to D. Owen Blake, General Attorney-Alabama; Creighton E. Mershon, Sr., General Attorney-Kentucky; Jim O. Llewellyn, General Attorney-Louisiana; John M. McCullouch, General Attorney-Mississippi; R. C. Whiteaker, General Attorney-Tennessee; from Fred McCallum, Attorney, re: TouchStar-Caller ID Service-State Law, and responses thereto. These materials are subject to attorney work product privilege.

Also enclosed are three memoranda from Richard Browne's files. The memorandum to him dated September 1, 1989, and his November 7, 1989, reply are clearly covered by the attorney-client privilege. The third memorandum, dated May 21, 1990, from Jim Monk to Pat Casey and others, recites to the recipients the legal advice Mr. Monk received, which I believe also remains within the privilege. I forward these to you to assure consistent treatment with those materials which should have appeared in your files as well. Note also that Kirven Gilbert's files on Petition of Joseph Baer for Rulemaking, FCC RM No. 7397, contain extensive handwritten notes of his analysis and mental impressions regarding the case, which we have treated as attorney work product.

Mr. R. Douglas Lackey
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Finally, our law library contains back issues of Telecommunications Reports and Communications Daily, some of which undoubtedly have referenced regulatory proceedings in South Central and Southern Bell states dealing with Caller ID. I have not culled them and don't propose to. If Mr. Beck wishes to come here to read them, he may.

WBB/etc