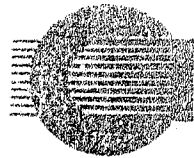


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National Centrex Users Group

P.O. Box 37-9141 • Chicago, Illinois 60637

March 28, 1990

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FLORIDA PUBLIC SERVICE COM. (FPC)
Tallahassee, Florida

Mr. Michael Wilson, Chairman
Florida Public Service Commission
101 East Gaines Street
Fletcher Building
Tallahassee, Florida 32399-0850

RECORDS / REPORTING

Dear Mr. Wilson:

Attached please find a statement of position by the National Centrex Users' Group regarding the provision of Automatic Number Identification (also variously known as Incoming Calling Line Identification or Caller*ID) to end users of telecommunications services. The organization feels strongly that this service can yield many potential benefits to telephone users and that the concerns expressed during debate on the issue, while thoughtfully presented are outweighed by these benefits.

We would hereby like to request that the enclosed paper be incorporated into public testimony during any proceedings which your jurisdiction may hold with regard to this subject,

if you would prefer that someone from the organization testify personally, we will arrange for this to the extent that our schedules and budgets permit.

If you have any questions regarding the position paper which can be answered verbally or in writing without a personal reply, please feel free to call Mr. Daniel F. Conos, NCUG Regional Vice President at (313) 995-4396.

Thank you for your consideration.

Sincerely,

Richard M. Janitor
President, National Centrex Users' Group

Attachment

DOCUMENT NUMBER-DATE

02875 APR-3 1990

FPC-RECORDS/REPORTING

A Statement of Position
on the Provision of Automatic Number Identification
to End Users of Telecommunications Services
March 28, 1990

The National Centrex Users' Group (NCUG) is an organization of large and small companies who subscribe to Centrex or a Centrex like service (e. g. Bell South ESSX, U. S. West Centron, Southwestern Bell Plexar, GTE Centranet). The NCUG represents Centrex users in regulatory and technical matters of common interest to all.

One of these items, which has received a great deal of attention recently, is the delivery of Automatic Number Identification, also known as ANI, Incoming Line Identification or Caller ID to the end user. The technology to deliver this service exists in a large percentage of densely populated areas of the U.S. today, and the upgrade of less dense areas to this current technology will make the capability virtually ubiquitous by the early 1990's.

ANI makes it possible for a subscriber to know the telephone number of a caller before that call is answered. This feature provides several advantages to potential users. For the residential customer, ANI provides a convenient "screening" device for unwanted calls. By reading the incoming caller's telephone number, the user can decide whether or not he or she wants to take the call. When a storage capacity enhancement is used, the feature can also serve as a simplistic answering device. A user who has been away from his phone can review the telephone numbers of those who have called and return the calls. This provides the added advantage to the caller that he or she does not need to incur a call charge in order to have a call returned. ANI can also provide invaluable information to telephone company or law enforcement personnel to track the source of annoying, abusive, or threatening calls.

To the business community, ANI provides a number of significant advantages. For instance in any of a number of delivery businesses who depend on accurate address and telephone information to carry out their function, ANI provides a reliable means to verify address information in the event that an address omission has been made. It also provides a cross check to make certain that a fraudulent order is not being placed, since a person placing a fraudulent order is not likely to give truthful information about his or her location and telephone number. ANI can also be a useful tool in a quality monitoring program, since telephone number information is readily available to call back customers and verify service quality.

ANI can also prove useful to police departments and emergency agencies. People in most major metropolitan areas of the country are now familiar with "E-911" emergency services, which provide local authorities in densely populated or affluent communities with the name and address of the caller even prior to answering the call. The problem with this service is that it is highly specialized and therefore expensive. Many smaller communities, both urban and rural, cannot afford E-911 equipment, even with subsidies from the state and federal governments. ANI display equipment, on the other hand, is relatively inexpensive

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to purchase, as low as \$65 to \$70 when purchased in quantity. This makes it affordable to virtually any agency that wants it. The provision of ANI makes it possible for emergency agencies to respond to calls for help even in situations where the caller is unable to give location information or neglects to do so. This timely response can save lives and minimize the impact of emergencies.

In a number of businesses, for instance colleges, universities and medical facilities, threats to the security of the institution (e.g. bomb threats) are a comparatively common occurrence. Today, valuable time and resources are wasted securing facilities subject to such threats and then attempting to find those responsible. With ANI, the source can be tracked by local law enforcement authorities much more quickly. Utilization of this feature means that private security personnel can be properly deployed and more effectively utilized.

There are a number of consumer advocates and concerned citizens who believe that ANI service should be limited to the groups who are permitted to receive it today, mainly telephone companies, long distance carriers, and law enforcement and emergency agencies. At first, their arguments might seem to be persuasive. For example, they argue that ANI is an invasion of privacy, that a merchant who they have called to make an inquiry, perhaps with no intention to buy, now has a telephone number that he can use to make annoying sales calls. Inarguably ANI can be used for this purpose. However, the situation differs little from the current practice of many credit card companies who conduct telephone solicitations of their cardholders and/or sell their subscriber lists to third parties to do the same.

Another, more serious objection to the service comes from those who perform sensitive functions within the community, for instance, community mental health workers, undercover police officers, and shelters for battered spouses. These individuals and organizations have a legitimate need to keep their telephone numbers concealed from some whom they serve. We believe that provisions should be made for these customers to block their ANI from Caller ID customers. The technology to accomplish this blocking exists and should be implemented in these cases. However, several consumer groups have argued that anyone with a non-published number should automatically receive blocking, and still others have argued that everyone should have the ability to selectively block his or her number by dialing a code. This is a trend which renders some of the greatest advantages of the service ineffective and represents overkill in the legitimate effort to protect privacy. Under one proposal, anyone who desired to make harassing, threatening or obscene telephone calls would have only to subscribe to a non-published number, and the identity of the perpetrator would be concealed just as effectively as it is today. In the latter instance, the same individual would only need to use the blocking code to accomplish the same thing.

Those subscribers to non-published service who argue that they pay for the service in order to preserve their privacy, may, at first blush, appear to have a reasonable argument. However, telephone companies are universally prohibited from revealing the identity of their non-published subscribers to anyone other than law

enforcement agencies. Telephone company employees who reveal non-published numbers to unauthorized parties are not only subject to disciplinary action which could lead to suspension or dismissal, but civil and criminal penalties as well. As a result it is virtually impossible to obtain this information from the telephone company even in an emergency. For this reason, third party data bases which contain this information have obtained it from another source unrelated to the telephone company, let alone the Caller I.D. feature. Further, there may be a significant number of non-published customers who would choose to enjoy the advantages of having their number displayed to law enforcement agencies, medical facilities, or even the local pizza parlor. In essence sufficient privacy safeguards already exist for these customers.

Further, there is a simple procedure which could enable those who have a concern about displaying a home telephone number to protect that concern. In several states it is already common practice to require telephone subscribers who use supervisory observing, a technology which enables businesses to listen to employee conversations with customers in an effort to ensure effective, quality customer service, to include with their listing in the telephone directory a distinctive mark such as an asterisk, to denote the fact that the telephone number being called is subject to supervisory observing. In this way, a caller is alerted to the fact that his or her call may be observed and can decide whether or not he or she wants to speak on an observed line. In the same way, Caller I.D. subscribers could have a similar notation made with their listings, enabling callers who are concerned about revealing their identities to go to another phone where the concern does not prevail or to forego making the call altogether. In any event, it is clear that technology and policy precedents already exist which would be more than adequate to safeguard concerns regarding threats to privacy.

In summary, the National Centrex Users' Group believes that the application of Caller I.D. technology can yield substantial personal financial, and service benefits to individual and corporate subscribers. Individuals need no longer fear the silence or heavy breathing at the opposite end of an annoyance call. They will now possess the knowledge necessary to control or eliminate the problem. Businesses who rely on accurate telephone number and address information will be able to protect their revenue streams. Furthermore consumers and businesses can benefit from more efficient customer service resulting from the business having a tool to handle a customer on a more personalized basis. Efforts to block new technology, whether the electric light over the kerosene lantern, the automobile over the horse and buggy or the telephone over the telegraph, have rarely succeeded. We believe that Caller ID, subject to prudent and proper but not excessive regulation, should not be forestalled from implementation.