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September 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

- ACK  Please find enclosed the original and 15 copies of GTE
- AFA  Florida Incorporated's Testimony of Larry K. Radin and Sue
- APP  Elsewrl for filing in the above stated matter.
- CAF  Service has been made as indicated on the attached
- CMD  Certificate of Service. If there are any questions with
- CTR  regard to this matter, please contact the undersigned at
- EAG  (813) 228-3087.
- LES  Very truly yours,
- LIN  *Thomas R. Parker*
- OPC  Thomas R. Parker
- RCH
- SEC  TP: fm
- WAS  Enclosures
- OTH

Elsewrl  
DOCUMENT NO. 891194-TL  
03607 SEP 26 1990  
FPC-RECORDS/REPORTING

*2 filings*

GTE Florida Incorporated  
GTE South Incorporated  
A part of GTE Corporation

RECEIVED & FILED

*Rad. O*  
FPC-BUREAU OF RECORDS

DOCUMENT NO. 891194-TL

03607 SEP 26 1990

FPC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Testimony by Larry K. Radin and Sue Elseewi in Docket No. 891194-TL has been furnished by U.S. mail on the 26th day of September, 1990, to the parties on the attached list.



---

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1 TESTIMONY OF LARRY K. RADIN

2 DOCKET NO. 891194-TL

3 Q. Please state your name and business address.

4  
5 A. My name is Larry K. Radin, and my business address  
6 is 201 North Franklin, Tampa, Florida 33602.

7  
8 Q. By whom are you employed and what is your  
9 position?

10  
11 A. I am employed by GTE Telephone Operations as the  
12 South Area security director.

13  
14 Q. Please briefly describe your educational background  
15 and business experience.

16  
17 A. I am a graduate of Florida State University with a  
18 Bachelor of Science degree in criminology. I have  
19 been employed by GTE for the past 18 years. In  
20 addition to my current position, I have held  
21 positions of increasing responsibility within the  
22 security organization, including fraud investi-  
23 gator, security investigator, special agent,  
24 security manager-investigations, and corporate  
25 security manager.

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PSC-RECORDS/REPORTING

1 Q. Please list any additional training and/or profes-  
2 sional memberships relevant to your current  
3 position at GTE.  
4

5 A. I performed an internship with the St. Petersburg  
6 Police Department in 1971, and in 1986, I completed  
7 the Citizens Police Academy training course. I am  
8 an officer in the American Society of Industrial  
9 Security. In addition, I have attended numerous  
10 seminars on technical and managerial security-  
11 related issues.  
12

13 Q. What are your current responsibilities at GTE?  
14

15 A. As the security director, I am responsible for  
16 oversight of all aspects of security services in  
17 our nine-state operating area, including the inves-  
18 tigation of criminal acts against GTE, subpoena  
19 compliance, physical security, telephone tracing,  
20 and administering all matters relating to the needs  
21 of law enforcement agencies and the courts. In  
22 support of these duties, I work on a daily basis  
23 with all federal, state and local law enforcement  
24 agencies on security matters requiring technical  
25

1 expertise. In short, I act as the liaison between  
2 GTE and the law enforcement community.

3  
4 Q. What is the purpose of your testimony in this  
5 proceeding?

6  
7 A. I will discuss the benefits, as well as the  
8 perceived risks, of calling number delivery  
9 services for law enforcement and other public  
10 safety organizations. I will also describe the  
11 best method for ensuring that calling number deliv-  
12 ery does not compromise the anonymity of such  
13 agencies.

14  
15 Q. What has been GTE's policy with regard to address-  
16 ing concerns raised by the law enforcement commun-  
17 ity?

18  
19 A. As a responsible community member, GTE has histori-  
20 cally been sensitive to and supportive of law  
21 enforcement needs. In this vein, GTE is committed  
22 to working in concert with law enforcement in an  
23 attempt to address their concerns about calling  
24 number delivery, without unduly compromising the  
25 value of this technology for the general public.

1 Q. To what extent have you had the opportunity to  
2 familiarize yourself with the views of law enforce-  
3 ment agencies regarding calling number delivery  
4 services?

5  
6 A. Because GTE Florida plans to seek permission to  
7 offer its own calling number identification  
8 service, I have made substantial efforts to become  
9 aware of law enforcement's concerns relative to  
10 potential risks posed by these services. Through  
11 numerous discussions and meetings, I have attempted  
12 to cooperate with agency representatives at the  
13 state and local levels in an effort to address  
14 these concerns, while still maintaining the  
15 integrity of the calling number identification  
16 service offering. In addition, I continue to  
17 monitor calling number delivery issues as they have  
18 developed in other states.

19  
20 Q. In what ways can calling number delivery services  
21 enhance law enforcement capabilities?

22  
23 A. Law enforcement officials, as well as the general  
24 public, can benefit from subscription to calling  
25 number identification service. Moreover, I believe

1 that this service will provide a meaningful  
2 deterrent to persons who make annoyance,  
3 threatening, or obscene calls. It will also  
4 facilitate enhanced call-tracing capabilities and  
5 once in widespread use, should lead to a reduction  
6 of such calls as bomb threats, false fire alarms,  
7 and related prank and menacing type calls.  
8

9 Q. Have your discussions with the law enforcement  
10 community identified any concerns about potential  
11 negative effects of calling number delivery on  
12 police operations?  
13

14 A. Law enforcement's concerns derive from the possi-  
15 bility that certain types of undercover police  
16 operations could be jeopardized if calling number  
17 delivery were offered without a mechanism for  
18 preserving confidentiality. I believe that, in  
19 most circumstances, number forwarding is not a  
20 problem for law enforcement operations. However,  
21 in certain exceptional situations, it may be impor-  
22 tant to conceal the calling number -- for example,  
23 when an officer is compelled to call an informant  
24 or target from his home. To the extent that these  
25 exceptions do occur, GTE recognizes the need to



1           devise a means to mask the source of these calls  
2           without severely compromising the overall benefits  
3           of calling number identification. As set forth  
4           more fully below, the issue of controlling number  
5           delivery has become the principal focus of my  
6           dialogue with the law enforcement community.

7  
8           Q.   Please list and describe the potential controls on  
9           number delivery that have been explored in your  
10          discussions with police officers.

11  
12          A.   As presented to me, state law enforcement officials  
13          expressed their desire for the telephone companies  
14          in Florida to adopt universal blocking on a per  
15          call or a per line basis. Per call blocking would  
16          enable delivery of the calling number on all local  
17          calls placed from a particular line, unless the  
18          caller dialed a prescribed code to block such  
19          delivery. Per line blocking would prevent delivery  
20          of the calling number on all local calls placed  
21          from a particular line. In both cases, the calling  
22          number identification device would display a  
23          protected call indicator -- "private #", for  
24          example -- instead of the calling number.

25

1 The control technique that GTE has most strongly  
2 advocated is Protected Number Service ("PNS"). PNS  
3 is designed to meet the needs of police agencies  
4 and public abuse centers to make calls without  
5 revealing their actual telephone number, or provid-  
6 ing any clue to the called party that the caller is  
7 with a governmental agency. The service will allow  
8 the agency to prevent its current telephone number  
9 from being passed to calling number identification  
10 devices or being announced via the use of GTE  
11 SmartCall features such as Automatic Call Return or  
12 Call Block. This is accomplished by assigning a  
13 second telephone number to a single line -- the  
14 current number and a new, nonpublished number.  
15 When the customer makes a call, the new number will  
16 appear on calling number identification devices of  
17 people who are called, or during voice announce-  
18 ments used with other SmartCall features. The  
19 actual subscriber number will never be seen or  
20 heard by the receiving party, not even on a toll  
21 call.

22  
23 When receiving legitimate calls from persons using  
24 the existing telephone number, the phone will ring  
25 normally, allowing the customer to recognize the

1 call as a familiar call. If someone returns a call  
2 using the number viewed on a calling number identi-  
3 fication device or via the use of Automatic Call  
4 Return, the telephone will ring distinctively,  
5 alerting the customer that this may be an unwanted  
6 caller.

7  
8 Additionally, efforts are underway to develop the  
9 capacity for PNS users to automatically route those  
10 calls made to their displayed telephone number to a  
11 recorded announcement advising the caller that the  
12 subscriber is not accepting calls.

13  
14 Other possible solutions discussed include the use  
15 of operator-handled calls, credit cards, cellular  
16 services, and coin telephones. These continue to  
17 remain viable options for use by law enforcement  
18 and others as a means of preventing recipients of  
19 calls from identifying originating subscriber  
20 information on both local and toll calls.

21  
22 Q. In your opinion, which of these options would best  
23 remedy the perceived security problems associated  
24 with calling number delivery services?  
25

1 A. I view the adoption of PNS as the best method of  
2 resolving governmental concerns, while maximizing  
3 the many benefits of calling number identification  
4 for the public at large. In contrast, universal  
5 blocking on a per call or per line basis would make  
6 it convenient for harassing callers to conceal  
7 their identities, thus undermining the broad  
8 benefits that calling number delivery provides to  
9 society by its ability to provide a meaningful  
10 deterrent to such calls.

11

12 Q. Should PNS be made available to groups other than  
13 law enforcement agencies?

14

15 A. It is likely that some types of social service  
16 agencies would find value in adopting PNS, and GTE  
17 plans to make it available to these groups as well.  
18 To my knowledge, GTE does not plan to make PNS a  
19 general offering in the state of Florida.

20

21 Q. To what extent have law enforcement personnel been  
22 receptive to the concept of PNS?

23

24

25

1 A. My contacts with law enforcement officials have led  
2 to a recognition that PNS will address the majority  
3 of their concerns regarding the need for confiden-  
4 tiality. The principal objection to PNS raised by  
5 law enforcement officials has been their desire for  
6 uniformity in the way calling number identification  
7 features are offered throughout Florida. From an  
8 operational and logistical standpoint, a uniform  
9 approach for addressing law enforcement concerns  
10 certainly has merit. This consideration, however,  
11 fails to weaken GTE's view that PNS is the  
12 preferred method of addressing law enforcement  
13 concerns, since GTE believes that PNS can be made  
14 available on a statewide basis.

15

16 Q. Does this conclude your testimony?

17

18 A. Yes, it does.

19

20

21

22

23

24

25