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October 11, 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 Answer to Public Counsel's Petition
for filing in the above stated matter.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____

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,

- LIN 6 Thomas R. Parker
- OPC _____
- RCH _____
- SEC 1 Enclosures
- WAS _____
- OTH _____

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FPC/RECORDS & REPORTING
GTE South Incorporated
A part of GTE Corporation

DOCUMENT NUMBER DATE
09123 OCT 11 1990
FPC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Proposed Tariff Filing by)
Southern Bell Telephone and Telegraph) Docket No. 891194-TL
Company Clarifying when a nonpublished) Filed: 10-12-90
Number can be Disclosed and Introducing)
Caller ID to TouchStar Service.)

ANSWER OF GTE FLORIDA INCORPORATED

GTE Florida Incorporated ("GTEFL"), pursuant to Commission Rule 25-22.037, Fla. Admin. Code, hereby submits its answer to the petition of Public Counsel which seeks to require Florida local exchange companies ("LECs") to offer ubiquitous call tracing service at usage sensitive rates of no more than one dollar. GTEFL submits that Public Counsel's petition is inappropriate and should be summarily denied. In support thereof, GTEFL states as follows:

1. Initially, it is necessary to point out a fundamental procedural defect apparent on the face of Public Counsel's petition. The petition pertains solely to call tracing and seeks to impose specific requirements upon the LECs' provision of this service. Except for the required caption, nowhere does the petition even mention Caller ID. Nevertheless, the filing has been submitted, without explanation, in the instant proceeding which will determine the terms and conditions upon which Caller ID may be offered.¹

¹ See Order on Prehearing Procedure in this docket, September 6, 1990, at page 5 ("List of Issues").

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Call tracing service and Caller ID are, of course, wholly distinct offerings with differing features and applications. A request for the Commission to formulate generic call tracing rules in the context of the Caller ID proceeding simply makes no sense. Its submission in this docket is thus best viewed as an inappropriate attempt to inject irrelevant matter into the Caller ID proceeding. Additionally, it would be unfair to permit introduction of wholly new matters at this stage, when direct testimony has already been filed. Indeed, Public Counsel has not met the requirements of Commission Rule 25-22.035(2), Fla. Admin. Code, to consolidate his petition into this proceeding.

GTEFL submits that the Commission should decline to entertain the petition, consistent with the goal of avoiding unnecessary delay and complication of the issues properly presented in this proceeding. Should the Commission determine that an in-depth examination of call tracing issues is warranted, initiation of a separate docket would be proper.

Despite GTEFL's belief that the petition is procedurally misplaced, the company will briefly respond to the matters it raises in order to aid the Commission to expeditiously dispose of the filing.

2. As noted above, Public Counsel urges the Commission to require those LECs offering call tracing to do so at usage sensitive rates of no more than one dollar per use. Under-

lying this request is the broad assumption that it is technically and economically feasible for all LECs to provide call tracing service on a per use (as opposed to subscription) basis. As set forth below, this basic premise is seriously flawed for a number of reasons.

In the process of developing its new Call Tracing Service, it quickly became apparent to GTEFL that ubiquitous, usage-based service would be impractical, due to technical constraints.² A chief difficulty in this respect stems from the fact that an unlimited, usage sensitive tracing service would necessitate the permanent allocation of memory to each subscriber's line. This ubiquitous distribution of central processor capability would impede the ability of the switch to record certain essential information about the call and otherwise place undue loads on the switch. Specifically, the majority of GTEFL's central offices do not have the ability to record the time at which a call was made, when that call is the first to be traced after a seven to eight day period of no trace activity. Since a principal feature of Call Tracing Service is its ability to produce official documentation for use in prosecuting nuisance callers, this limitation undermines the utility of the service and its attractiveness for subscribers.

² GTEFL recently requested Commission permission to offer Call Tracing Service in Florida. See proposed General Services Tariff revision A.13.14.4b(8), filed on October 9, 1990.

In comparison, there are no such problems with a subscription offering, where there is no requirement of universal memory allocation. Under these circumstances, all information will be recorded on all calls. Call tracing on an ubiquitous, usage sensitive basis is thus an inferior service relative to the subscription version of the offering. Furthermore, universal memory allocation would place additional demands on the central office, thus reducing capacity which could be better used for other functions.

Modification of GTEFL's switches to remedy the problems associated with usage sensitive call tracing are certain to be expensive and unreasonably protracted. For instance, generic changes to the existing System Version Releases would need to be developed and implemented, a process which would take an extended period of time.

3. A second, major technical obstacle to GTEFL's ability to offer call tracing on a per use basis concerns the billing functions necessary to accommodate this type of offering. GTEFL's billing system currently is unable to render billings for per use tracings. Activation of usage sensitive Call Tracing Service will cause unique Automatic Message Accounting ("AMA") recordings to be produced, thus requiring the billing system to be modified in several respects. First, the billing system will need to be enhanced to: (1) recognize the new Call Tracing Service AMA recordings, (2) create a new internal record format, (3) process

the information, and (4) pass the record along to toll for rating. Second, alterations to the toll system will be necessary to rate each Call Tracing Service record. Third, Customer Records and Billing ("CRB") will have to be enhanced to display the Call Tracing Service charges on the customer's bill. Fourth, all enhancements to the present toll/CRB operations will, in turn, need to be made to the planned Customer Billing Services System. As in the case of the necessary switch alterations, current preliminary estimates reveal that these modifications will be very costly and unable to be implemented without substantial delay.

This discussion assumes that billing will occur for each activation of Call Tracing Service, whether or not the trace is successfully completed. GTEFL is unaware of automated means through which it is possible to bill for successful traces only. The need to bill for unsuccessful traces will lead to certain consumer dissatisfaction and reduced attractiveness of the service -- in short, a service that is inferior to a subscription offering.

4. Further analysis would be necessary to determine with complete accuracy the total, additional costs of providing ubiquitous, usage sensitive call tracing versus the preferred subscription offering. Nonetheless, the magnitude of the changes required compels the conclusion that an ubiquitous, usage-based service is prohibitively expensive for the benefits provided, assuming that the technical problems can

be overcome. There are no grounds upon which to justify the time, effort and expense involved in providing per use tracing, especially when the relative benefits of doing so remain merely speculative. Indeed, Public Counsel's petition merely assumes that subscribers would prefer per call pricing, rather than a flat rate; it offers no support for the assertion that the current Florida Southern Bell subscription rate structure and rate level for call tracing discourage "wide use and availability of the service."³ GTEFL believes that costly and unnecessary alterations to the service as planned can only raise the price of the offering for all users.

Although the foregoing discussion has been limited to matters dealing with equipment expenses, it should also be noted that Public Counsel's request, if adopted, will increase administrative and personnel expenses. For instance, implementation of an ubiquitous call trace service will require staffing additions to existing Security Department personnel beyond reasonable levels. This problem will not arise under the subscription approach, which includes a certain "take rate" by the potential population base.

5. Given the level of expense involved in tailoring operations to allow an ubiquitous, usage sensitive call tracing service, the unreasonableness of Public Counsel's suggested one dollar per use charge for this service becomes

³ Public Counsel's petition at 2, para. 5.

immediately apparent. No complex calculations are necessary to determine that a one dollar charge is not within the realm of economic possibility under these circumstances. Even assuming away the increased costs flowing from a usage-based offering, there is simply no plausible basis for proposing a \$1.00 per use figure.

It has long been the policy of this Commission to price discretionary services at levels which support universal service. Under Public Counsel's proposal, the Company would have to deploy a tremendous amount of capacity, investment and expense "up front," with recovery obtained only if the service is utilized. GTEFL submits that it will never receive a return of its investment under the proposal contained in Public Counsel's petition.

6. The foregoing discussion demonstrates that Public Counsel's proposal to mandate usage sensitive call tracing service at a one dollar rate is devoid of merit. Due to technical limitations, usage sensitive call tracing is currently infeasible. The cost of removing these limitations and instituting other, necessary changes would render this type of offering economically infeasible. Finally, the suggested one dollar charge is arbitrary and unreasonable.

Given the lack of any factual basis to support the numerous assumptions upon which the petition is based, GTEFL believes it warrants no further consideration. However, if the Commission wishes to formulate rules to govern call

tracing, that objective would best be served by initiating a docket separate from this Caller ID inquiry. The inefficiencies inherent in defining call tracing requirements in the present proceeding can only result in delay in bringing new technology to the public.

Respectfully submitted this the 11th day of October, 1990.

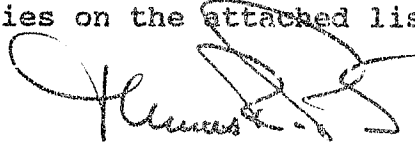
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Answer to Public Counsel's Petition in Docket No. 891194-TL has been furnished by U.S. mail on the 11th day of October, 1990, to the parties on the attached list.



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