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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 the
Rebuttal Testimony of Dr. Sue W. Elseewi 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
FP: fm

Enclosures

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FLORIDA PUBLIC SERVICE COMMISSION

GTE Florida Incorporated
GTE South Incorporated
A part of GTE Corporation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the Rebuttal Testimony of Dr. Sue W. Elseewi 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.



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1 REBUTTAL TESTIMONY OF DR. SUE W. ELSEEWI

2
3 DOCKET NO. 891194-TL

4
5 Q. Please state your name and business address.

6
7 A. My name is Dr. Sue W. Elseewi, and my business
8 address is One GTE Place, Thousand Oaks, CA 91362.

9
10 Q. By whom are you employed and what is your posi-
11 tion?

12
13 A. I am employed by GTE Telephone Operations as Staff
14 Administrator in Market Research.

15
16 Q. Briefly state your educational background and
17 business experience.

18
19 A. I graduated from the University of California,
20 Riverside in 1975 with a Bachelor of Arts degree in
21 Sociology and in Political Science, from the same
22 university in 1976 with a Master of Arts degree in
23 Political Science. I received a doctorate in
24 Political Science in 1980 also from the University
25 of California, Riverside. I taught various courses

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1 in Political Science at Chaffey College as lecturer
2 and assistant professor through 1986. I joined GTE
3 in 1987 as a Market Research Analyst, was promoted
4 to Senior Analyst in 1988 and to my current posi-
5 tion as Staff Administrator-Consumer Market
6 Research in 1989. I have had primary responsibili-
7 ty for research in custom local area signalling
8 service since July 1988.

9
10 Q. Have you previously filed direct testimony in this
11 proceeding?

12
13 A. Yes. I have previously submitted pre-filed testi-
14 mony on behalf of GTE Florida in Docket No. 891194-
15 TT.

16
17 Q. What is the purpose of the additional testimony
18 which you offer at this time?

19
20 A. The purpose of this testimony is to rebut testimony
21 filed by Dr. Mark Cooper on behalf of Public
22 Counsel regarding consumer reaction to Caller I.D.
23
24
25

1 Q. Specifically, what shortcomings did you find in the
2 studies cited by Dr. Cooper?

3
4 A. On page 12 of his filed testimony, Dr. Cooper
5 states that "The number of telephone subscribers
6 who find [Caller I.D.] troubling equals or exceeds
7 the number who find the service interesting or
8 valuable." No empirical evidence is cited to
9 support this conclusion. Research conducted by GTE
10 in Kentucky demonstrates that this conclusion is
11 contrary to fact, as the proportion of consumers
12 who express privacy concerns has decreased dramati-
13 cally in Elizabethtown, Kentucky since introduction
14 of the service. Further, the number of those who
15 wish to subscribe to CNID far exceeds those
16 expressing privacy concerns.

17
18 An Equifax poll is cited later on the same page in
19 support of an assertion concerning public concern
20 about Caller I.D. I believe that this poll
21 utilizes unsound methodology by asking "leading"
22 questions. The Equifax question was as follows:

23
24 "A new telephone service, Caller
25 I.D. is available in some states.

1 People with this service will be
2 able to see the telephone number of
3 the person calling them. Do you
4 think telephone companies should be
5 allowed to sell this service to
6 people who want to buy it, or not?"

7
8 "The Equifax Report on Consumers in
9 the Information Age", 1990, p.78,
10 Atlanta, GA.

11
12 Rather than determining what the respondent thinks
13 of Caller I.D., or if there are inherent privacy
14 concerns associated with the service, the respon-
15 dent is presented with an essentially negative bias
16 as to whether telephone companies should be allowed
17 to sell it or not. The phraseology of the question
18 suggests that there is something threatening about
19 the service. Further the respondent is led to only
20 two alternatives: "Yes," the telephone company
21 should be allowed to sell the service; or "No," the
22 company should not be allowed to sell it. Even
23 though preceded by this bias, in excess of half the
24 respondents felt that the service should be allowed
25 (55%, compared to 43% who said no).

1 Again, when further pursuing the question by pre-
2 senting arguments for and against Caller I. D., a
3 basic principle of research was violated in that
4 the arguments were not rotated, i.e., presented to
5 half the respondents with the pro argument coming
6 first and to the other half with the con argument
7 coming first. Instead, the last argument heard
8 prior to asking the question was that Caller I.D.
9 was a "bad" idea. This is an example of order bias
10 and may well incline respondents toward answering
11 with the most recent thought presented to them,
12 i.e., Caller I.D. is bad. This is a methodological
13 error which should always be avoided in conducting
14 objective research.

15
16 I submit that the phrasing of the questions in the
17 Equifax poll is biased; that the lack of rotation
18 order introduces yet another bias; that the results
19 are therefore suspect and have no implications for
20 views on privacy.

21
22 Dr. Cooper also cites an informal poll from Glamour
23 magazine. Such polls of self-selected respondents
24 necessarily reflect the extremes of opinion as only
25 those with intensely held opinions are likely to

1 take the effort to respond. The Glamour poll thus
2 should not be considered reflective of public
3 sentiment.

4
5 The Pennsylvania Exhibit presented on page 19 is
6 highly misleading and misrepresents the available
7 data. In actuality only 5% of respondents felt
8 there were "many occasions" in which they would
9 mind forwarding their number. Thirty-one percent
10 felt there were "a few occasions in which they
11 would mind forwarding their number and 63% said
12 there were "no occasions" in which they would mind
13 forwarding their number.

14
15 Seventy-eight percent of the non-published respon-
16 dents felt it was an excellent or good idea that
17 the service be offered. Only three percent felt
18 that it was a poor idea.

19
20 Dr. Cooper presents a chart on page 15 of his
21 testimony to substantiate his views that "a large
22 segment of the population feels that forwarding the
23 outgoing number will decrease privacy". See Cooper
24 prefiled testimony at 14. A more objective inter-
25 pretation of this table is that three-quarters of

1 all respondents perceive that number forwarding
2 produces no change or an increase in privacy.
3 These percentages are even higher among those who
4 are likely to subscribe to the service and those
5 who currently have non-published listings.

6
7 On the other hand, receiving the incoming number is
8 perceived by 9 of 10 respondents as increasing
9 their privacy or having no effect upon privacy.
10 These results corroborate GTF findings which demon-
11 strated that those with experience with CLASS
12 services felt that these services enhanced their
13 privacy. See Elseewi prefiled testimony.

14
15 The New Jersey Bell table cited on page 17 of Dr.
16 Cooper's testimony is an interpolation of data
17 garnered from different questions. Although it is
18 true that as high as 59% of non-published customers
19 expressed concern about display of their phone
20 number, the vast majority of these same respondents
21 felt that it was a good or excellent idea for New
22 Jersey Bell to offer the service.

23
24
25

1 In summary, Dr. Cooper has juxtaposed data to
2 obfuscate the point that one can be aware of pri-
3 vacy concerns and still feel that Calling Number
4 I.D. is a service that should be offered.
5

6 Q. Have you any remarks regarding Dr. Cooper's conten-
7 tion that Call Tracing or Call Block are substi-
8 tutes for Caller I.D.?
9

10 A. Yes. GTE research in Kentucky among users of all
11 services indicates that Caller I D. is preferred
12 over Call Tracing and Call Block, which are
13 perceived as imperfect substitutes for Caller I.D.
14 Eighty-three percent of respondents had programmed
15 no numbers for Call Block. Only 11 percent ever
16 tried Call Tracing.
17

18 Focus group discussions indicated that, generally,
19 consumers correctly perceived Call Tracing as a
20 service to resort to only when the threatening
21 nature of the call mandated legal intervention.
22 Respondents felt that Caller I.D. (and among those
23 who did not have Caller I.D., Automatic Call
24 Return) more aptly met their needs to handle
25 nuisance calls.

1 Automatic Call Return can fulfill this function
2 only if invoked immediately after receiving a call,
3 and cannot enjoin future calls. Call Block can
4 screen out future calls only if it is immediately
5 employed. However, this alternative requires the
6 customer to subscribe to the two services whose
7 combined costs exceed Caller I.D. and whose utility
8 is less than Caller I.D. in ordinary circum-
9 stances.

10
11 Additionally, suggesting Call Tracing or Call Block
12 are substitutes for Caller I.D. places the burden
13 on the consumer to use clumsy methods for dealing
14 with the nuisance situation. Call Block, for
15 instance, requires programming. GTF research shows
16 that the more complex the requirement for customer
17 action, the less likely the customer is to use the
18 service. For this reason, passive services such as
19 Call Waiting or Caller I.D. are preferred by the
20 customer.

21
22 Q. Dr. Cooper's testimony implies that there is
23 consumer concern about number forwarding. You
24 have personally stated that the empirical basis
25 for this contention is lacking. Do you have any

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data which addresses consumer concern about number forwarding?

A. Yes, I do. Preliminary data from a follow-up study of test respondents in Elizabethtown, Kentucky indicates that less than one in five (19%) feel there are ever times when they would not want their telephone number revealed to the person they are calling. Of this minority who would not want their number revealed on certain occasions, half said this would apply to only 1 to 10 percent of the calls they place. The types of calls to which the restriction applied were primarily to stores and businesses.

Q. Have you any information pertinent to consumer desire for Call Blocking?

A. Yes. Test respondents in Kentucky were asked how often they would use a service to block their number from being sent forward if the service were available at no charge. Only a small percentage of respondents would make frequent use of a blocking service if it were free. Three-quarters of respondents said they would invoke such a service never

1 (45%) or less than once a month (29%) even if it
2 were free.
3

4 Q. Do you have any concluding observations regarding
5 Dr. Cooper's testimony?
6

7 A. Yes. The hypothetical problems of abuse cited by
8 Dr. Cooper have not occurred in the New Jersey
9 experience. See Cooper prefiled testimony at 8-11.
10 See also BPU Docket No. TT88070825, Six Month
11 Report; Pennsylvania Docket No. R-891200, Respon-
12 dents Statements No. 2 (Fortescue): "Hypothetical
13 concerns expressed before the introduction of
14 Caller I.D. have not materialized." Neither have
15 any of these theoretical concerns been evidenced in
16 the CLASS Market Trial in Elizabethtown, KY.
17 Indeed, concerns about privacy have decreased as
18 users overwhelmingly feel Caller I.D. protects
19 their privacy.
20

21 I submit there is little need among the public at
22 large for Calling Number Delivery Blocking. Rather
23 the small numbers of persons expressing concern
24 could best be served by operator assisted calls,
25

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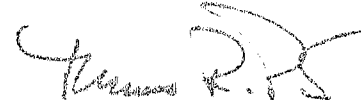
calling cards, public phones or GTE's proposed
Protected Number Service.

Q. Does this conclude your testimony?

A. Yes.

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