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Alan N. Berg
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January 11, 1991

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

Re: Docket No. 891194-TI - Caller ID

Dear Mr. Tribble:

Enclosed for filing in the above referenced docket please find the original and fifteen copies of the Brief of United Telephone Company of Florida.

A copy of same has been furnished to all parties of record as shown on the attached Certificate of Service.

Sincerely,

Alan N. Berg

ANB/prc
Enclosure

- ACK
- APC _____
- APP _____
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- OPC _____
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- SEC _____
- WAB _____
- WHI _____

DOCUMENT NUMBER DATE
00339 JAN 11 1991
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings by)
Southern Bell Telephone and Telegraph) Docket No. 891194-TL
Company clarifying when a non-published)
number can be disclosed and introducing) Filed: January 11, 1990
Caller ID to TouchStar Service)
_____)

**POST HEARING BRIEF
OF
UNITED TELEPHONE COMPANY OF FLORIDA**

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BASIC POSITION OF UNITED

United Telephone Company of Florida's basic position in this Docket is that Caller ID provides substantial benefits to consumers.

United has filed a tariff with the Florida Public Service Commission that offers Caller ID to United's customers with the option of having free per-call blocking assigned to their line. This will not be an ubiquitous offering, but will only be provided to those customers who request the service. Normal service order charges will apply to any request for per-call blocking except during new service requests and during the initial 60 days after the tariff is approved when service order charges are waived to promote the ExpressTouchSM Service. There will not be a disconnect charge. Special considerations for customers with non-published numbers will not be required since they will be able to request free per-call blocking, just as anyone else.

Caller ID is not a prohibited trap and trace device as defined in Florida Statutes, nor does it violate any provision of the Florida Constitution, Florida Statutes or Federal Statutes.

Issue 1

(Informational) For the purposes of this docket, what is the definition of Caller ID?

Caller ID essentially has two definitions in today's environment, the first (more of a global term) encompassing the broad scope of passing information about the calling party through the network and the second (more of a specific term) being the actual Caller ID feature provided by Custom Local Area Signaling Service (CLASSSM)¹. (Jones, T. 489)

The first definition of Caller ID, the broad form of calling party identity is referred to by United Telephone Company of Florida (United), as Calling Party Identification (CPID) information. CPID has been broadly defined and developed within the Information Industry Liaison Committee (IILC) to encompass all forms of calling party identification information (including the Caller ID feature), which automatically allows the called party to identify the calling party, station, or line. Additional forms of CPID include Automatic Number Identification (ANI), directory numbers, calling party name, calling party address, and personal identification codes. CPID delivery services are made available through such methods as Feature Group D access, Common Channel Signaling System 7 (SS7), Feature Group B access, CLASS, Simplified Message Desk Interface (SMDI), and Integrated Services Digital Network (ISDN). (Jones, T. 489-490)

¹ CLASS is a service mark of Bell Communications Research, Inc.

The Caller ID feature, which is the primary focus of this Docket, is a subset of CPID. It enables the called customer to view, via a display unit, the primary telephone number of the calling party who initiated the incoming call. The display unit may be an adjunct device which sits next to the customer's telephone set or it may be a special telephone set with the display unit built into the telephone. (Jones, T. 490)

The Caller ID feature is one of the CLASS services. United has filed its tariff for the CLASS services under the name of ExpressTouch^{SM 2} Service. The Caller ID feature will only work on calls which originate and terminate within the CLASS equipped network area. (Jones, T. 490)

The differences and similarities between the CPID and its Caller ID feature subset, are important because while the method of providing the Caller ID feature is new, the act of sending information about the calling party through the network (CPID) is not new, and has been going on for years. CPID is an essential factor in meeting today's telecommunication needs and should not be restricted. (Jones, T. 491)

² ExpressTouch is a service mark of United Telecommunications, Inc.

Issue 2

[Legal] Is Caller ID a trap and trace device as described in Chapter 934, Florida Statutes?

Issue 3

[Legal] Does Caller ID violate any federal laws or any laws of the State of Florida?

Section 934.02(21), Florida Statutes, defines a trap and trace device as a "device which captures the incoming electronic or other impulses which identify the originating number of an instrument or a device from which a wire or electronic communication was transmitted."

Caller ID is a service (not a device) which allows the called party to see the calling party's telephone number displayed before answering the telephone. (See, Simms, T. 52) Caller ID does make use of customer premises equipment (CPE) to display the calling number, but the CPE is the equivalent of a dumb terminal which does nothing more than display, and, in some cases, record information sent to it. The CPE does not have the capability of capturing incoming electronic impulses which identify the originating number, it can only display or record information sent to it. The CPE is a passive device; it does not actively seek out and capture impulses, it merely displays what is sent to it.

Caller ID and the CPE used in conjunction with it is not a trap and trace device.

If it is assumed, for the sake of argument, that the CPE used in provision of Caller ID service is a trap and trace device as defined in the Chapter 934, Florida Statutes, such an assumption

does not affect the legality of the service under Chapter 934, Florida Statutes.

Section 934.31(1), Florida Statutes, states "Except as provided in this section, no person may install or use a pen register or a trap and trace device without first obtaining a court order under s.934.33." Section 934.31(2), Florida Statutes states: "The prohibition of subsection (1) does not apply with respect to the use of a pen register or a trap and trace device by a provider of electronic or wire communication service:

* * *

(c) Where the consent of the user of the service has been obtained."

The user of the service is the person receiving calls in a trap and trace situation. The statutory language uses the singular word "user" not the plural word "users." Use of the singular establishes under the clear language of the statute that only the consent of the person receiving the calls in a trap and trace situation is required under the statute. This statutory language is further supported by practices of telephone companies and law enforcement agencies. Trap and trace is used by telecommunication companies in conjunction with law enforcement agencies, on requests of customers, to resolve cases of harassing and abusive telephone calls. No attempt is made, could be made, or is required, to obtain the consent of the person placing the harassing or abusive calls. To interpret the statute as requiring the consent of both parties to a trap and trace request renders the consent exception

meaningless. It would require the consent of unknown persons prior to those unknown persons placing calls. It can not be assumed that the legislature inserted a meaningless exception into the statute.

Obtaining the consent of a customer for a pen register is a different matter. The user of the service in a pen register situation is the person making the call. In most cases, a user of the service could write down the numbers, he or she calls, and does not need to have the numbers recorded for him or her by a pen register. Pen registers are most frequently used to gather information about a customer's called numbers without the calling or called parties' knowledge or consent. This is an entirely different situation from a trap and trace which is almost invariably done at the customer's request.

If trap and trace at the request of the customer were in violation of the Chapter 934, Florida Statutes, the emergency E-911 system which allows the 911 answering point to see a display of the calling number (and other information) would not be legally permissible.³

It is thus clear that a trap and trace device can be used under Section 934.31(2)(c), Florida Statutes, where the consent of the user of the service has been obtained.

³ The exception for 911 service established in Section 934.03(2)(g)(2), Florida Statutes, applies to intercept and recording "of incoming wire communications; . . ." not the trap and trace of incoming numbers. The exception for trap and trace of incoming calls for 911 system providers, as well as other customers, is provided in Section 934.31(2)(c), Florida Statutes.

The language of the federal statute dealing with pen registers and trap and trace devices found in 18 USC § 3121 et seq. is almost identical to that of the Section 934.31 et seq., Florida Statutes. The federal statute, like the Florida Statute, contains an exception "where the consent of the user of that service has been obtained." (18 USC § 3121(b)(3)) The same arguments made above in regard to the Florida Statute also apply to the federal statute.

United knows of no case where use of a trap and trace device with the consent of the user of the service has resulted in a prosecution for the violation of either the Florida or federal statute.

Caller ID and the CPE used with it are not trap and trace devices. Even if the CPE used with Caller ID was considered to be a trap and trace device it would not violate either Florida or federal laws because it is used with the consent of the user of the service.

Issue 1

[Legal] Does Caller ID violate Florida's Constitution?

Article I, Section 23, of the Florida Constitution (1968) states:

Right to Privacy.--Every natural person has the right to be let alone and free from governmental intrusion into his private life except as otherwise provided herein. This section shall not be construed to limit the public's right of access to public records and meetings as provided by law.⁴

This provision of Florida's Constitution protects natural persons against governmental intrusions into their private lives. Caller ID is not a "governmental intrusion."

This Section of the Florida Constitution was recently examined in the case of Shaktman v. State, 553 So.2d 148 (Fla. 1989). The Shaktman case involved the use of a pen register without the consent of the user of the service. The law enforcement agency involved followed the provisions of Sections 934.32 and 934.33, Florida Statutes, and obtained a court order prior to installing the pen register. The use of the pen register was upheld by the Supreme Court in the Shaktman case; however, in its decision the Florida Supreme Court stated: "We agree with the Third District that the privacy interests of article I, section 23 are implicated when the government gathers telephone numbers through the use of a pen register." (emphasis added, at page 151)

⁴ Section 23 was added to the Constitution in 1980.

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Caller ID is not a governmental intrusion or the government gathering telephone numbers. Caller ID is a service offered by private businesses for its customers.

The fact that the private business involved is a regulated utility does not make the service a governmental intrusion or a state action. The United States Supreme Court in the case of Jackson v. Metropolitan Edison Co., 419 U.S. 345 (1974), stated:

The mere fact that a business is subject to state regulation does not by itself convert its action into that of the state for purposes of the fourteenth Amendment. Nor does the fact that regulation is extensive and detailed, as in the case of most public utilities, do so. (at page 350)

Although the finding quoted above from the Jackson case deals with state action under the fourteenth amendment of the U. S. Constitution, the rationale is transferable to the case at issue in the absence of any state decisions on the issue. The mere approval of a tariff of a private, regulated business by the FPSC allowing the offering of a new service, does not rise to the level of state action, nor does the use of that service become a "governmental intrusion" within the meaning of the Shaktman case or Article I, Section 23 of the Constitution of the State of Florida.

Another federal case involving a Florida telephone company tariff relied upon and reached the same conclusion as the Jackson case. In Carlin v. Southern Bell, 802 F.2d 1352 (11 Cir. 1986), the Eleventh Circuit Court of Appeals found that: "As noted above, the mere approval by the FSC of a business practice of the regulated utility does not 'transmute a practice initiated by the

utility' into state action. Jackson, 419 U.S. at 345. . ." (at page 1361)

Caller ID is a service initiated by local telephone companies. It is not a service that the state required the local telephone companies to offer. Caller ID is a service offered by private businesses which happen to be regulated by the State of Florida. That regulation does not constitute state action which would raise Caller ID to the level of a "governmental intrusion" prohibited by Article I, Section 23 of the Constitution of the State of Florida.

Caller ID does not violate the Constitution of the State of Florida.

Issue 5

What are the benefits and detriments to Florida's consumers of Caller ID services?

The hearing described many benefits of Caller ID services.

Among the benefits described were:

Discouragement of obscene, annoying and harassing calls, increased security and privacy for persons subscribing to the Caller ID feature, increased security in access to data bases, storage of numbers of calls missed so they can be returned later, and the ability of hearing impaired persons to distinguish calls which should be answered with a Telecommunications Device for Deaf (TDD) persons from those calls which should be answered with an automated recording or announcement device. (Sims, T. 55-57)

Other benefits include reduction of bomb threats and false fire alarms, reduction of prank calls, verification of originating point of calls from persons under house arrest or on parole. Caller ID will also allow businesses to be more responsive to customers and reduce the occurrence of fraudulent orders received by telephone. (Sims, T. 57-59)

The primary detriments disclosed at the hearing include the reduction of privacy of the calling party (See, Cooper, T. 600, Elsewi, T. 368-369 and Phoenix, T. 953), revealing the telephone numbers of undercover law enforcement officers and informants (See, Tudor, T. 816-818), revealing the telephone numbers of persons calling "hot lines" (See, Elsewi, T. 369), and revealing the telephone numbers of persons calling abusive spouses in

circumstances involving domestic violence.⁵ (See, Dunn, T. 999-1000)

Although conflicting testimony was heard concerning whether Caller ID deters harassing calls, bomb threats and prank calls, the results cited from states where Caller ID is in use indicated that Caller ID does have these beneficial effects. (See Exhibits 22 and 23)

Caller ID is a service which does provide benefits where it is made available, but several parties to the Docket questioned whether the benefits outweigh the detriments listed above.

Numerous methods of ameliorating the alleged detriments of Caller ID were proposed. (See, Sims, T.62-66, Radin, T. 440-442 and Jones, T. 496-498, 501) Conflicting testimony was heard concerning the efficacy of the proposed methods of protecting undercover law enforcement officers and informants, and in maintaining the privacy of calling parties in general, in preserving the anonymity of callers to "hot lines", and in maintaining the secrecy of locations of persons calling abusive spouses.

The general consensus was that some form of blocking of Caller ID would be beneficial in ameliorating the detriments of Caller ID (See, Tudor, T. 815, 819, 824, Brown T. 897-898 and Phoenix, T. 954 and 956), although at least one witness from the Florida Coalition

⁵ In domestic violence situations, the problem arises from the ability of the called party who subscribes to Caller ID to obtain the calling party's telephone number, and through use of the telephone number, ascertain the location of the calling party.

for Domestic Non-Violence expressed her desire that Caller ID not be implemented even with blocking. (See, Dunn, T. 1011-1012)

The variety of methods of maintaining anonymity or not disclosing the calling party's telephone number proposed by the local exchange companies, along with per call blocking on request without charge as proposed by United, would offset most, if not all, of the detriments pointed out in the testimony in the Docket. The offering of per call blocking on request also eliminates the administratively burdensome necessity of determining which domestic non-violence and other social service organizations should be eligible for per line blocking. (Jones, T. 513)

Universally available per call blocking as proposed by Centel would be equally effective, but in at least the case of United, would involve considerable expense to provide memory in each switch to provide every access line with blocking capability. (See, Jones T. 507-508)

Many access lines will never require anonymity. A recent US West trial cited by Southern Bell's witness Sims revealed that customers activated per call blocking only 143 times on a million calls. (Sims, P. 65) Many residential customers will not use blocking. Many business lines, pay telephones, and governmental offices⁶ will not require anonymity. It makes no economic sense to provide memory for those access lines which will never use

⁶ Under Florida's Public Records Laws, any citizen of the state could acquire information concerning telephone numbers of State offices with few limited exceptions.

blocking service. For lines which require blocking, it is available on request without charge under United's proposal.

The benefits of Caller ID can be obtained, and the detriments ameliorated by the offering of per call blocking on request without charge. (See Ex. 23, p. 18-20)

Issue 6

Are there any existing CLASS services (e.g., Call Trace, Call Return, Call Block, etc.) that have similar functions and/or benefits as Caller ID; if so, what are their detriments? Is their rate structure appropriate?

No other existing or proposed CLASSSM services offer functions or benefits similar to Caller ID. (See, Jones, T. 493-494 and Sims, T. 67) The closest proposed service is Call Trace (or Call Tracing in United's proposed tariff), but it does not provide calling party telephone numbers to the called party.

Call Trace allows the customer to activate a system that records the number of the telephone from which the call was made. (Sims, T.68) Local exchange companies generally do not make information about the subscriber assigned the number recorded available to the customer. (See, Sims, T. 68 and Radin, T. 469)

Unlike Caller ID, Call Trace does not let the customer know what number the call is coming from prior to answering the call. A customer relying only on Call Trace may answer calls from the same harassing caller several times before Call Trace will be effective in deterring the calls. Call Trace also requires that the called party hang up before the call can be traced. In an emergency situation, such as a potential suicide, breaking the connection with the potential victim could jeopardize any rescue effort. (Sims, T. 68)

Caller ID is a distinct and different service from Call Trace with distinct and different capabilities, benefits and detriments.

Call Trace is not the same or substantially the same service as Caller ID.

The rate structure of Call Trace has been a matter of disagreement in this docket. Southern Bell has favored offering Call Trace on a monthly flat rate basis. (See, Southern Bell Position, Prehearing Order No. 23791, p. 27) The Office of Public Counsel (OPC) has proposed a usage based charge of no more than \$1.00 per use. (See OPC Position, Prehearing Order No. 23791, p. 28-29)

United can see logic in both proposals. Call Trace involves both fixed costs in making the service available, and usage cost each time the service is used. United has submitted a Call Trace⁷ tariff proposal combining flat rate and usage bases proposed by Southern Bell and the OPC. The Call Trace tariff provision United has submitted makes the service available for a flat rate monthly charge of \$1.00. This will make the service widely available, and recover United's cost of making the service available. United also proposes to charge \$5.00 each time the service is used. This will cover the cost incurred each time the service is used, and discourage its frivolous use.

This is a practical compromise of the opposing positions on the rate structure in this matter. Rate levels depend upon the circumstances of each company.

⁷ United calls the service Call Tracing.

Issue 7

What effect will Caller ID have on nonpublished and unlisted subscribers?

If United's proposal to offer per call blocking on request at no charge is approved, United see no effect of Caller ID on nonpublished and unlisted subscribers.

With the availability of per call blocking on request, any nonpublished or unlisted subscriber who wishes to prevent his or her number from being revealed through Caller ID, can request per call blocking and use the service in those situations where the caller sees fit. The restricted availability of their telephone number will be preserved.

Even in areas where per call blocking has not been made available, a large percentage of customers with nonpublished numbers take the Caller ID service, and very few customers with nonpublished numbers cancel their nonpublished service. (See Sims, T. 61-62)

Issue 8

What alternatives to Caller ID blocking are available and do they sufficiently protect customers' anonymity?

United agrees with the position of GTE-Florida that this issue implies that a calling party has a right to anonymity. Such a right does not exist. United's General Exchange Tariff in Section A2,B.2.a., provides that:

"2. Establishment of Identity

a. The calling party shall establish his identity in the course of any communications as often as may be necessary."

The Southern Bell and GTE-Florida General Exchange Tariffs have similar provisions. (See Sims, T.60, and the Position of GTE-Florida on this Issue in Prehearing Order No. 23791 at page 23)

A calling party has no right to anonymity under existing tariff language; however, a calling party can reveal his or her identity under the tariff provisions cited without being required to reveal his or her telephone number.

Numerous alternatives to Caller ID blocking which would allow a calling party not to reveal his or her telephone number are available and were discussed during the hearing in this Docket. Among the alternatives to blocking which were discussed were: placing calls through an operator, use of calling cards, use of pay telephones, processing calls through third parties, such as answering services and office PBX's, use of out dial only lines, use of RingMaster type services, use of foreign central office or

foreign exchange services, and use of cellular telephones. (See Sims, T. 65 and 66, and Jones, T. 496-497)

All of the above listed alternatives allow a calling party to make a call in a Caller ID environment without revealing his or her telephone number.

United agrees with the testimony of Southern Bell witness Sims that for the "vast majority of calls customers have no need or desire for anonymity," which she supported by citing a US West trial where customers activated per call blocking only 143 times on a million calls. (Sims, T. 65)

In spite of United's belief that on the vast majority of calls customers will not need or desire to maintain confidentiality of their telephone numbers, United has proposed per call blocking on request at no charge. Per call blocking will provide convenience for customers in preserving the confidentiality of their telephone numbers in those few situations in which such confidentiality is desired.

Issue 9

Should the Commission allow or require the blocking of Caller ID? If so, to whom and under what rates, terms, and conditions?

United has proposed that the FPSC should allow per call blocking of Caller ID on request without charge.

Under United's proposal a customer would be allowed to request per call blocking service from United. If the request was made during the initial sixty day offering period of United's ExpressTouchSM service or during an initial request for telephone service, the service order charge would be waived. If ordered outside the initial sixty day ExpressTouchSM offering period or other than in an initial service request, the normal service order charge would apply. The service, once ordered, would be free of charge. No charge would be assessed for disconnection of the service.

The offering of per call blocking on request, offsets most, if not all, of the detriments of Caller ID pointed out in the testimony in the Docket. The offering of per call blocking on request also eliminates the administratively burdensome necessity of determining which domestic non-violence and other social service organizations should be eligible for per line blocking. (Jones, T. 513)

Universally available per call blocking as proposed by Centel (along with other methods proposed) would be equally effective, but in at least the case of United, would involve considerable expense

to provide memory in each switch to provide every access line with blocking capability. (See, Jones T. 507-508)

Many access lines will never require anonymity. A recent US West trial cited by Southern Bell's witness Sims revealed that customers activated per call blocking only 143 times on a million calls. (Sims, T. 65) Many residential customers will not use blocking. Many business lines, pay telephones, and governmental offices⁸ will not require that their telephone numbers not be revealed. It makes no economic sense to provide memory for those lines that will never use blocking service. For lines which require blocking, it is available on request without charge under United's proposal.

The benefits of Caller ID can be obtained, and the detriments ameliorated by the offering of per call blocking on request without charge.

⁸ Under Florida's Public Records Laws, any citizen of the State could acquire information concerning telephone numbers of State offices with few limited exceptions.

Issue 10

What special arrangements, if any, should be made regarding Caller ID for law enforcement operations and personnel?

The goal of United is to provide law enforcement with the necessary alternatives to ensure that the safety of their personnel and informants is not jeopardized by the offering of Caller ID service.

Per call blocking on request as proposed by United offers significant protection for law enforcement personnel and their informants.

In addition to per call blocking on request, United will make special arrangements with law enforcement agencies for the use of calling cards, SignalRingsm (which is similar to the RingMaster and PNS services of Southern Bell and GTE-Florida), outward only service, foreign exchange and foreign central office service. (See, Jones T. 496-497 for a description of each of these services.) Additional methods not presently thought of may become available in the future, and unique needs of law enforcement in particular situations may require unique solutions. United will continue to work with law enforcement to provide solutions to unique situations and to develop other special arrangements.

United is troubled by the proposal which would transmit numbers from other locations as the calling party's number. (See, Tudor, T. 837-838 and 848-849) For example, if a call is made from

⁹ A service mark of United Telecommunications, Inc.

a telephone in the police station, but a bus station pay telephone number is transmitted to the person receiving the call, innocent persons could be endangered. This situation could occur if an undercover police officer tells a drug dealer that he will call the drug dealer from the bus station pay telephone at 11:00 P.M. The drug dealer receives a call from the law enforcement officer at 11:00 P.M. which shows the bus station pay telephone number, but is actually from the police station. A person actually using the bus station pay telephone at 11:00 P.M. or answering a return call by the drug dealer to that number, may be subject to harm, or misidentified as a person involved in a criminal enterprise, by the drug dealer or his or her accomplices. United opposes the substitution of telephone numbers in use by the general public for those of the calling law enforcement entity which might result in harm or danger to a member of the general public.

The proposal to provide universal blocking and then create exceptions that would have calling numbers delivered regardless of whether they were blocked or not (Tudor, T. 851-852) is not fully understood by United. This proposal requires further explanation, and further study before being ruled upon by the Commission. At this point United cannot even determine if the proposal is technically feasible.

Issue 11

What special arrangements, if any, should be made regarding Caller ID for any other group or groups?

As in the case of law enforcement, per call blocking on request as proposed by United offers significant protection for social service organizations, their employees, and clients. Per call blocking on request also eliminates the need to certify any particular organization or individual as qualifying for blocking.

(Jones, T. 513)

To the extent that per call blocking on request does not satisfy the requirements of social service organizations, United will provide special arrangements which would correspond closely with those developed for law enforcement and discussed in Issue 10 above.

Issue 12

Is Caller ID in the public interest?

Caller ID is in the public interest. It offers significant benefits to the public, which are discussed in Issue 5 above. The detriments identified by opponents of Caller ID, which are also discussed in Issue 5 above, are substantially lessened, if not eliminated, by the offering of per call blocking on request without charge and the other alternatives to per call blocking which are available to law enforcement agencies and social service organizations.

With per call blocking on request, the many benefits of Caller ID can be made available to the Citizens of the State of Florida, with little, if any, effect of the identified detriments. (See Exhibit 23, p. 19-20)

Caller ID should be approved with per call blocking on request.

Issue 13

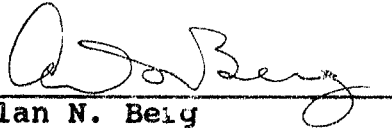
What further action should be taken on Southern Bell's tariff filings introducing Caller ID (T-89-507) and changing the conditions under which nonpublished number information will be divulged (T-90-023)? What should be the effective date of such action?

United takes no position on action which should be taken on Southern Bell's tariff.

United has filed its own tariff which is suitable for conditions existing within United's service territory and United's configuration of its network. United's proposed tariff differs from the Southern Bell tariff in that it offers Caller ID with per call blocking on request under terms and conditions described in Issue 9 above. United's proposed tariff also differs from the Southern Bell tariff in that it offers Call Trace with a fixed element of \$1.00 per month for access to the service, and \$5.00 per each use of the service. This pricing level and structure will make the service widely available, recover the cost of the service, and discourage frivolous use of the service.

The terms and conditions proposed in United's tariff are suitable for conditions existing in United's service territory, and it requests that its tariff be approved within sixty days of its filing.

Respectfully submitted,



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CERTIFICATE OF SERVICE
DOCKET NO. 891194-TI

I HEREBY CERTIFY that a copy of United Telephone Company of Florida's Brief has been furnished by U.S. Mail or hand-delivery to the following parties this 11th day of January, 1991:

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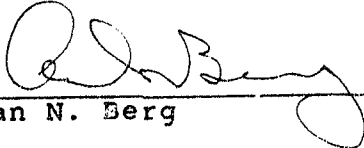
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