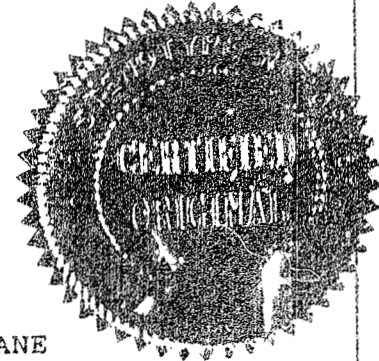


**ORIGINAL
FILE COPY**

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings)
by SOUTHERN BELL TELEPHONE AND)
TELEGRAPH COMPANY clarifying)
when a nonpublished number can)
be disclosed and introducing)
Caller ID to TouchStar Service)

DOCKET NO. 891194-TI



DEPOSITION OF:

TERRY H. LANE

TAKEN AT THE INSTANCE OF:

The Citizens of the State of
Florida, by and through
Jack Shreve, Public Counsel

DATE:

Tuesday, February 25, 1991

TIME:

Commenced at 10:20 a.m.
Concluded at 10:35 a.m.

PLACE:

Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32301

REPORTED BY:

JANE FAUROT
Notary Public in and for the
State of Florida at Large

ACCURATE STENOTYPE REPORTERS, INC.
100 SALEM COURT
TALLAHASSEE, FLORIDA 32301
(904) 878-2221

DOCUMENT NUMBER-DATE

02311 MAR -7 1991

APPEARANCES:

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I N D E X

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WITNESS

PAGE

TERRY H. LANE

Direct Examination by Mr. Beck
Cross Examination by Mr. Mathues

4
13

EXHIBITS

IDENTIFIED

1 Minutes of TouchStar Implementation Team
Meeting of 10-18-89

8

CERTIFICATE OF REPORTER

18

1 Q Mr. Lane, will you please state your full name.

2 A Terry H. Lane.

3 Q By whom are you employed?

4 A South Central Bell Telephone Company.

5 Q And what is your position with the Company?

6 A I am a Manager in the Security Department.

7 Q What are your specific job duties as a manager?

8 A I work in the -- as a staff manager providing staff
9 support for the Security Organization in South Central Bell.

10 Q To whom do you report?

11 A Mr. Cox.

12 Q And do you have specific areas of responsibility?

13 A No, sir, just providing staff in general, staff
14 support in general for the Security Department.

15 Q Again, I am trying to get a little bit of an idea of
16 what your job is day in and day out.

17 MR. KEENER: Is that a question?

18 BY MR. BECK:

19 Q Would you be able to tell me what those things are?

20 A Any matter dealing with security that came into Mr.
21 Cox's office that he asked me to handle for him having to do
22 with security matters only, I would do that.

23 Q Could you give me an example of the types of things
24 that you are involved in with security?

25 A Routine reports of Security Department type activity.

1 Any questions asked by any other department about some
2 particular matter in security, I might formulate a response to
3 that. The efforts to mechanize certain features of the
4 Annoyance, of the -- not the Annoyance Call Center, but --
5 well, that plus other security matter functions, that type of
6 thing. I guess, you know, just provide support to the people
7 who do security work.

8 Q Does the Annoyance Call Center come under Security
9 within South Central Bell?

10 A Yes, sir.

11 Q And what responsibilities do you have vis--vis the
12 Annoyance Call Center?

13 A The only responsibility that I have is to mechanize,
14 get the Annoyance Call Center function mechanized.

15 Q What do you mean by that?

16 A Well, the work done in the Annoyance Call Center, for
17 the most part, is a manual paper process, and we are just
18 trying to get that mechanized so that the employees in the
19 center can use terminals and have the data, the information
20 about customers and what have you, mechanized into a computer
21 system to make the operations more efficient.

22 Q Do you use Caller ID in your Annoyance Call Center?
23 Like if a person calls into the center, do you have something
24 that would display the telephone number from which they are
25 calling?

1 A No, sir.

2 Q Is that under consideration?

3 A Not to my knowledge.

4 Q Are you familiar with a TouchStar implementation
5 team?

6 A Yes, sir.

7 Q What is that?

8 A That is a team made up of individuals from different
9 departments that would have -- that their department would be
10 involved to some extent in the deployment of TouchStar services
11 throughout the Company.

12 Q Okay. Does this team still exist?

13 A As far as I know, it does.

14 Q Okay. Are you a member of that team?

15 A No longer.

16 Q When were you a member, if you were?

17 A In 1989 and the very first part of 1990.

18 Q What events led to your not being a member of that
19 team any more?

20 A A new manager came into our headquarters security
21 organization and took over the responsibility for the Annoyance
22 Call Center and the team membership, too.

23 Q How did that change your responsibilities?

24 A Basically, when the new manager came in I became the
25 staff manager for the security organization, and prior to that

1 time, I was the manager for the Annovance Call Center.

2 Q Who was the person who took your place on the
3 TouchStar implement team?

4 A Ms. Jane Pilkington.

5 Q Could you generally state what the purposes of the
6 team were, though?

7 A It seemed to me that the purposes of the team were to
8 meet regularly and review the status of deployment of TouchStar
9 services and to discuss any problems that any department might
10 be experiencing.

11 Q Do you have Deposition Exhibit 1 before you?

12 A Yes.

13 Q Could you take a moment to look at that and tell me
14 if you are familiar with it?

15 A Yes.

16 (Deposition Exhibit 1 marked for identification.)

17 Q Did you actually prepare these minutes or was that
18 done by somebody else?

19 A It was somebody else.

20 Q Okay. But do these reflect the minutes of the -- the
21 minutes of a meeting of the TouchStar implementation team at
22 which you were present?

23 A Yes, it appears to; on October the 18th, 1989.

24 Q Could you turn to Page 3 of the exhibit, which is the
25 last page?

1 A Okay.

2 Q Okay. And, specifically, if you could refer to the
3 section under miscellaneous, under security?

4 A Uh-huh.

5 Q About halfway down in that paragraph it states that,
6 "Terry Lane also stated that South Central Bell does not feel
7 Caller ID will reduce annoying call problems." Do you see that
8 there?

9 A Yes, sir.

10 Q Do you recall stating that at that meeting?

11 A No, sir, I didn't state that.

12 Q What did you state?

13 A At the meeting I stated that it was my opinion that
14 Caller ID would not substantially reduce the annoying call
15 problem initially in South Central Bell.

16 Q Why did you feel that way?

17 A Why did I feel that it would not substantially?

18 Q Yes.

19 A I guess the point I was trying to make there, that I
20 was concerned that someone may have the perception with Caller
21 ID that it was going to eliminate or do away with the annoyance
22 call problem. And my concern was having enough staff in the
23 Annoyance Call Center, that I was responsible for at the time,
24 to support call tracing customers that we had already. At the
25 time, we didn't have any Caller ID customers in South Central

1 Bell.

2 Q And you thought that if it were advertised as a way
3 to stop harassing calls that people would feel you wouldn't
4 need as many people in the Annoyance Call Center?

5 A No, sir. The concern I had about the advertising was
6 that I wanted to be sure that a customer didn't think that if
7 he subscribed to Caller ID, then he could then contact the
8 Annoyance Call Center to obtain some additional help and
9 resolution of his problem. For instance, if he got a harassing
10 call, and he was a Caller ID problem, that was my concern about
11 the advertising, that I wanted to be sure that the customer
12 understood, you know, what he was getting.

13 Q Okay. So, you didn't want customers of Caller ID to
14 be calling the Annoyance Call Center, is that generally it?

15 A I didn't have any problem with them calling the
16 Annoyance Call Center and getting the help that they could get
17 from the Annoyance Call Center. I didn't want them to call the
18 Annoyance Call Center thinking that, "Hey, I got a harassing
19 call. And here is the telephone number, you take care of it,"
20 that was my concern.

21 Q Down on the same paragraph, a little further, it
22 states that, "Terry Lane requested that Caller ID not be
23 promoted as a way to stop harassing calls," do you see
24 that?

25 A Yes, sir.

1 Q Is that accurate?

2 A That's accurate to the degree I just explained to
3 you. That was my point during the meeting.

4 Q Okay. Did South Central Bell promote Caller ID as a
5 way to stop harassing calls?

6 A Not to my knowledge. I was concerned that it might
7 get to that, because of the fact that Caller ID was commented
8 about as being a way to discourage annoying calls in the
9 general public.

10 Q And you don't feel the advertisements by South Central
11 Bell convey that message to customers, that if you get Caller
12 ID, harassing calls will be diminished?

13 A Say that again. I'm sorry.

14 Q Okay. You don't think the Caller ID advertising by
15 South Central Bell conveys the message that Caller ID will help
16 diminish harassing calls?

17 A To be honest, I am not sure what the advertising says
18 about Caller ID. It's certainly my opinion, though, that I
19 think Caller ID will discourage people from making certain
20 types of harassing calls. But I am not in the Marketing
21 Department or the Advertising Department, so I am not familiar
22 with exactly what they say.

23 Q In which South Central states is Caller ID available
24 now?

25 A Tennessee, Tennessee only.

1 Q How long has it been available there?

2 A I believe it was first deployed in like November of
3 '89, if I am not mistaken. I think that's correct.

4 Q What has been the effect of Caller ID in the
5 Annoyance Call Center serving Tennessee?

6 A I don't know. I can't -- I don't have any basis to
7 determine the effect on it.

8 Q Why is that?

9 A The Annoyance Call Center -- there is only one for
10 South Central Bell. It is centralized in Birmingham, Alabama,
11 and it handles customers from all five states. And the way the
12 customers contact the Annoyance Call Center, and the calls come
13 into the Annoyance Call Center, they are counted through a call
14 distributor machine. But they are not broken down. It can't
15 break them down as to what area those calls are coming from.
16 So, we don't know that there is a certain number from Kentucky
17 and a certain number from Tennessee. We just know that we have
18 got this many calls coming into the Bureau.

19 Q Okay. And has South Central Bell taken any steps to
20 try to isolate the effect of Caller ID then? I gather the
21 answer is no, but I wanted to check with you.

22 A Not that I am aware of.

23 MR. BECK: That is all I have. Thank you. There
24 may be some others.

25 MS. GREEN: No.

CROSS EXAMINATION

1
2 BY MR. MATHUES:

3 Q Mr. Lane, my name is Steve Mathues. I represent the
4 Department of General Services.

5 A Yes, sir.

6 Q Looking on this same Page 3 and the same
7 miscellaneous category, there is a statement that reads, "When
8 the market is highly penetrated with call tracing and Caller
9 ID, there may be a reduction." Do you agree or disagree with
10 that statement?

11 A I agree with that.

12 Q Why do you believe a reduction would take place?

13 A I believe that when the market --

14 MR. KEENER: A reduction of what? I'm sorry, I
15 didn't know what it is referring to.

16 THE WITNESS: I guess I was assuming, too, so let me
17 clarify that.

18 MR. MATHUES: For purposes of clarity, I assume it
19 refers to annoying call problems, which is in the
20 sentence, one sentence before what I just read. Can we
21 agree that that is what it refers to, annoying call
22 problems?

23 THE WITNESS: Yes, I can.

24 MR. MATHUES: Does your silence indicate --

25 MR. KEENER: Go ahead and ask him, I'm sorry.

1 BY MR. MATHUES:

2 Q Assuming then that that is the case, why do you
3 believe that annoying call problems would be reduced?

4 A It is just my opinion, of course, but I feel that
5 when the market is saturated with all of these TouchStar
6 features, including Call Trace and Caller ID, that there has to
7 be some discourage of people making these calls.

8 Q Are you familiar with the term Universal Call Trace?

9 A No, sir, I don't believe I am.

10 Q Assume, if you would, that universal --

11 MR. KEENER: Excuse me. Before you get into this
12 subject, if you could just show me how it relates to this
13 memo, I would be glad to consider your questions.

14 MR. MATHUES: I am pursuing his understanding of the
15 statement which I read earlier.

16 MR. KEENER: That's fine if you can just show me --
17 tell me how it has to do with the memo. I don't
18 understand how it has to do with his statement earlier.

19 MR. MATHUES: Okay.

20 MR. KEENER: Honestly, I don't.

21 MR. MATHUES: We will go about this a different way,
22 then.

23 BY MR. MATHUES:

24 Q Mr. Lane, could you tell me what call tracing means
25 to you? How does it work?

1 A Yes, sir. Call tracing to me is a service that a
2 customer can subscribe to that gives him the ability to trace
3 the previous annoying call that he has received.

4 Q Now, when you say "subscribe," could you tell me what
5 you mean by that?

6 A For a customer to have this service, he would have to
7 contact the business office and request that service. And if
8 it is available to him, where he is located, then for a charge
9 it is put on his service. And I don't know how that is done,
10 but then he has the ability at that point.

11 Q Do you know whether or not Caller ID is available the
12 same way through subscription?

13 A To the best of my knowledge, that is how you get it.

14 Q In your opinion, is it in your Company's interest to
15 reduce annoying call problems such as we have been discussing
16 here?

17 A In my opinion, is it in my Company's interest to
18 reduce annoying call problems?

19 Q Yes, sir.

20 A I would think so.

21 MR. KEENER: If I could just throw in a clarifying
22 question here. Annoying call problems, are you referring
23 to the number of calls you get to the Annoyance Call
24 Center, or are you referring to the unknown mass of
25 annoying calls that exist out there in the world?

1 THE WITNESS: I was referring to the unknown mass of
2 annoying call problems in the world.

3 MR. KEENER: When you say right here, "Terry Lane
4 also stated that Southern Bell does not feel the Caller
5 ID will not reduce annoying call problems," that was to
6 the unknown mass of annoying calls in the world?

7 THE WITNESS: Yes.

8 BY MR. MATHUES:

9 Q Referring then to this as the unknown mass of
10 annoying calls, is it, in your opinion, in your Company's best
11 interest to reduce the number of those calls?

12 A Yes, sir, I would say that is my opinion.

13 Q Toward that reduction, then, if Call Trace were
14 offered to all subscribers and charged on a per activation
15 basis; that is, it was available at anytime and they paid only
16 if they used it, would that increase the deterrent effect you
17 think it would have?

18 A I've got no idea.

19 MR. MATHUES: No further questions. Thank you, sir.

20 THE WITNESS: Yes, sir.

21 MS. GREEN: We have no questions.

22 MR. BECK: Anything -- any further questions?

23 MR. KEENER: I took care of my questions. Thank
24 you.

25 MR. BECK: Thank you very much. We appreciate it.

(The deposition was concluded at 10:35 a.m.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF LEON)

I, JANE FAUROT, Court Reporter, Notary Public in and for the State of Florida at Large:

DO HEREBY CERTIFY that the foregoing proceedings was taken before me at the time and place therein designated; that before testimony was taken the witness/witnesses were duly sworn; that my shorthand notes were thereafter reduced to typewriting; and the foregoing pages numbered 1 through 17 are a true and correct record of the proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor relative or employee of such attorney or counsel, or financially interested in the foregoing action.

WITNESS MY HAND AND SEAL this 5th day of March, 1991, in the City of Tallahassee, County of Leon, State of Florida.

Jane Faurot
JANE FAUROT, Court Reporter
Notary Public in and for the
State of Florida at Large

My Commission Expires: July 16, 1993

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings by) Docket No. 891194-TI
SOUTHERN BELL TELEPHONE AND TELEGRAPH)
COMPANY clarifying when a nonpublished)
number can be disclosed and introducing)
Caller ID to TouchStar Service)

Deposition Exhibit No. 1

Caller ID

- Tennessee has completed their stakeholder effort and has filed their Caller ID tariff. At this time there has been no intervention.
- Tennessee Customer Service Reps will be trained after the tariff effective date. The sale date will probably be 2 weeks after that effective date.

Deployment by State

- Kentucky - The deployment schedule is the same. Louisville is scheduled 2Q91. Westport and Crestview will not be included. Kentucky has not decided on how they will sell TouchStar. They will be equipped for Caller ID.
- Louisiana - The Louisiana schedule brings 7 locations up from 9/1/91 until 12/31/91 beginning with New Orleans. They include New Orleans, Baton Rouge, Shreveport, Monroe, Lafayette, Lake Charles, and Alexandria. They will try to move up generic updates. All features, including Caller ID will be ready at deployment.
- Mississippi - Jackson and the Gulfcoast are still expected to be deployed 4Q91. They will cut with all features, including Caller ID. Natchez has been upgraded to generic 10, but is being sold as generic 9. It is not a 2 LHS. The procedures are in the field for generic 10, and George Grier will check into the announcements to see if there are differences. Mississippi asked if a new TouchStar tariff would become effective as the Natchez trial tariff expired on 11/90.
- Tennessee - Deployments are on schedule. Memphis will be the first Caller ID site. SLC issues may exclude some Memphis COs from Caller ID. All the 1As are equipped with Caller ID as are and 2 SESS offices. The digital offices will bring up the non-list features in January or February.
- Nashville still has a 3/31/~~89~~⁹⁰ date. This will be advanced if possible.
Caller ID in the SOTAs will be brought up as soon as they can. Tennessee is still reviewing and checking the inventory.
- Alabama - Birmingham is on schedule for 10/1/90. The digital switches will have the non-list features plus Caller ID. (The 1A switches will, of course, have all features, plus Caller ID.) The digital switches will be equipped with Phase II no later than 1 year after the phase

I deployment. This is being done because network did not want to "piggyback" the work. By the end of 1992 Phase II will be in all metro areas deployed.

Montgomery is due 4/1/91, Huntsville 1092, and Tuscaloosa 70912.

Miscellaneous:

Security

✓ A request was made at an earlier Caller ID meeting that questions related to Caller ID number identification not be directed to the ACB. However, they are investigation questions such as shall they give published names to a customer with a CID number. Terry Lane also stated the SCS do not feel Caller ID will reduce annoying call problems. There has been no substantial reduction in load with Call Tracing. When the market is highly penetrated with Call Tracing and Caller ID, there may be a reduction. Terry Lane requested that CID not be promoted as a way to stop harassing calls. Mick Chlon agreed and said all ads would show positive benefits of who is calling.

M&Ps

SESS M&Ps have been completed. Tennessee will get them via normal distribution which takes approximately 4 weeks.

The next TouchStar meeting in Birmingham is on December 5 at SCS headquarters in room 5 on the 12th floor at 9.00 a.m.

The telephone bridge is (404) 577-6439, access code 4285.