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ORIGINAL
FILE COPY

March 25, 1991

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 891194-TI

Dear Mr. Tribble:

Enclosed is the original and fifteen copies of Southern Bell Telephone and Telegraph Company's Supplemental Brief which we ask that you file in the above-referenced docket.

A copy of this letter is enclosed. Please mark it to indicate that it was received and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely yours,

E. Barlow Keener

E. Barlow Keener

Enclosures

cc: All parties of record
A. M. Lombardo
H. R. Anthony
R. Douglas Lackey

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

CERTIFICATE OF SERVICE
Docket No. 891194-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 25th day of March, 1991 to:

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E. Barlow Keener

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 Filed: March 25, 1991

SUPPLEMENTAL BRIEF

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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INTRODUCTION

On September 29, 1989, Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") filed with the Florida Public Service Commission ("Commission") two tariff revisions. One tariff revision introduced Caller ID as a seventh call management feature of the TouchStar Service Offerings (proposed General Subscriber Services Tariff ("GSST") A13.19.2(G)). The other tariff revision clarified conditions under which a number associated with a non-published listing may be disclosed (proposed GSST A1 and A6.4.1(A)).

On June 19, 1990 and June 21, 1990, approximately six months prior to the evidentiary hearings, the Office of Public Counsel ("Public Counsel") served two requests for production of documents regarding Southern Bell. Public Counsel requested that Southern Bell provide documents in the control of "BellSouth Corporation" ("BellSouth"). On July 24, 1990 and July 26, 1990, Southern Bell filed its responses and objections. Southern Bell objected to producing documents which were in the control of BellSouth Corporation. On August 14, 1990, Public Counsel filed a motion to compel the production of the BellSouth documents. Public Counsel did not notice its motion for hearing and failed to raise its argument at the November 15, 1990 Prehearing Conference when the Prehearing Officer asked Public Counsel if there was further argument to make.

Even though Public Counsel failed to have its argument heard prior to the evidentiary hearing, Public Counsel finally requested on the first day of the November 28, 1990 hearing that the Prehearing Officer grant its Motion to Compel with respect to the BellSouth documents. In addition, Public Counsel requested that the hearings be delayed until the BellSouth documents were produced. The Prehearing Officer refused to delay the hearing but ordered Southern Bell to file a list of the responsive BellSouth documents and to produce the documents. Southern Bell timely produced the documents to Public Counsel.

After reviewing the BellSouth documents, Public Counsel filed, on December 20, 1990, a Motion for Additional Limited Hearing regarding a "host of new information concerning the issues in this docket". On January 16, 1991, the Commission issued Order No. 23995, granting Public Counsel's motion. In Order No. 23995, the Commission required Public Counsel to specifically identify the documents that he proposed to use during the additional hearing, and to identify the specific issue to which each such document related. In Order No. 24113, issued on February 15, 1991, the Prehearing Officer held that Public Counsel could use six of the documents during the discovery depositions and during the additional hearing. These documents included:

Exhibit I) A memorandum, dated August 6, 1990, from Dennis to Hamby and Bush ("Dennis Memorandum"), addressing Issues 5 and 9;

Exhibit II) An undated memorandum from Shultz to Monk with an attached article from the New York Times, dated January 19, 1990 ("Shultz Memorandum"), addressing Issues 5 and 6;

Exhibit III) A memorandum, dated April 25, 1990, from Cox to Casey with an attached letter dated April 16, 1990 ("Cox Memorandum"), addressing Issue 5;

Exhibit IV) The TouchStar Implementation Team meeting minutes, dated October 19, 1989 ("Lane Document"), addressing Issues 5 and 6;

Exhibit V) A memorandum dated April 20, 1990, from Wallace to Shultz ("Wallace Memorandum"), addressing Issue 6; and

Exhibit VI) The Touchstar Implementation Team meeting minutes, dated September 10, 1990 ("Rollins Document"), addressing Issue 6.

Subsequent to the Prehearing Conference, Public Counsel took the depositions of two Southern Bell employees, two South Central Bell Telephone Company ("South Central Bell") employees, one BellSouth employee and one BellSouth-D.C., Inc. employee all of whom were associated with the documents listed above. After the depositions were completed, Southern Bell and Public Counsel agreed to cancel the scheduled limited hearing and to enter the depositions and six exhibits into evidence. The Commission accepted the agreement as set forth in Order No. 24231, issued on March 12, 1991.

STATEMENT OF POSITION

Public Counsel requested that the Commission allow the six documents described above to be entered into evidence because the documents "contain a host of new information concerning issues in this docket". Public Counsel asserted that the six documents addressed Issues 5, 6 and 9. These issues are:

> Issue 5 - What are the benefits and detriments to Florida's consumers of Caller ID service;
>
> 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; and
>
> Issue 9 - Should the Commission allow or require the blocking of Caller ID, if so, to whom and to under what circumstances?

As set forth herein and as revealed through a review of the six exhibits and depositions, it is evident that the exhibits and depositions did not "contain a host of new information" as suggested by Public Counsel. In fact, it appears that Public Counsel used the exhibits and depositions as an opportunity to rehash the same old arguments addressed during the two day hearing, in 1110 pages of transcripts, and a voluminous number of exhibit pages. The absence of significant "new" information, can only lead to one conclusion: there was no practical need for an additional hearing or discovery depositions. Rather, the

procedure demanded by Public Counsel appears to be an attempt, though as shown below unsuccessful, to find Southern Bell, South Central Bell, or BellSouth employees whose personal opinions reflected the official position of Public Counsel.

In order to avoid being repetitious and for the sake of simplicity, Southern Bell addresses each document and discusses the relationship of the document to the issues rather than addressing each issue separately.

EXHIBIT I: DENNIS MEMORANDUM

Public Counsel suggested that the Dennis Memorandum, dated August 6, 1990, from Gary J. Dennis to T. Hamby and E. Rush, addresses Issues 5 and 9, because it discusses the benefits and detriments of Caller ID and various types of blocking. (Public Counsel's Response to Order No. 23995). Mr. Dennis is a BellSouth-D.C., Inc. staff manager who is familiar with Caller ID matters before the Federal Communications Commission ("FCC"). Mr. Dennis created the memorandum in order to communicate a suggestion, which he "dreamed up", to BellSouth Services, Inc. employees responsible for Caller ID. (Dennis Dep., p.7) Mr. Dennis thought that if Caller ID were implemented as he suggested the public debate surrounding Caller ID could possibly be eliminated. Mr. Dennis suggested that Caller ID could be

provided one of three ways: 1) Caller ID with blocking for unidentified calls; 2) Caller ID that would not block unidentifiable calls; and (3) Caller ID with per call blocking. (Dennis Dep., pp. 7-8).

During the deposition, Mr. Dennis explained that suggestions such as his are a necessary part of the process of creating sound Company policy, but that his suggestion did not represent the Company's position or policy:

> Q. Would it be correct to say that you had more or less abandoned your position because of the technological impossibility of your suggestions?
>
> A. I certainly pretty well put it aside. I guess I also felt that, this is just part of the ongoing internal discussion that is healthy to a company in that -- for providing suggestions and making sure that others have thought of various things and that there are things still in the mill. I am not sure with this proceeding that I am going to be as forthright with suggestions in the future. But, essentially, I had fairly well put that aside. And to my knowledge, it still is a technology that is a possibility, one that we haven't even made purchase decisions on, to my knowledge. And there is a lot [that might] happen before that technology could be in place in any part of the region.
>
> * * *
>
> I think what I did was, as I would hope that other people in the corporation would, and I would hope that people external to the corporation would understand there is a certain amount of suggesting and suggestion and discussion that goes on in any policy decision.

Dennis Dep., pp. 16-17.

As explained by Mr. Dennis, a Company requires the input of numerous employees with various opinions, ideas, and suggestions in order to formulate a policy that best meets the needs of the Company and its customers. Mr. Dennis' Memorandum contains one of many ideas and suggestions and was a suggestion considered by the Company in formulating the Company's Caller ID position which was presented by Southern Bell's witness Ms. Sims at the Caller ID hearing.

Regardless of the fact that Mr. Dennis' suggestion was not the Company's position, Public Counsel's rationale that this document contains a "host of new information" is clearly an exaggeration. The Dennis Memorandum fails to provide ideas or concepts which the Commission had not already reviewed during the Caller ID hearing (See Tr. p. 141).[1] Clearly, Public Counsel is attempting to use this exhibit as a device to rehash issues such as per call blocking which were thoroughly discussed during the hearing. Southern Bell submits that the use of these exhibits for the purpose of rehashing issues raised during the hearing is a waste of the Commission's time and resources.

---

[1]Southern Bell responded to the technical capability of blocking the blocker in response to a Staff interrogatory prior to the hearing. The issue of per call blocking was discussed by all the parties throughout the two days of the hearing.

Contrary to Public Counsel's old argument regarding universal blocking, Southern Bell's position as presented by Ms. Sims during the hearing is that in order to maximize the benefits offered by Caller ID to all customers, both those who subscribe and those who do not subscribe to the service, there should be no universal blocking (Tr. Sims, p. 62). Southern Bell's witness clearly stated at the hearing that:

> I think with [the availability of universal blocking] that the [Caller ID] service will be affected by the fact more and more people will use [blocking]. And the wrong people.

Tr, Sims, p. 208. In addition, a study performed by Pacific Bell of California revealed that universal per call blocking would devalue Caller ID by 30%. Most importantly, Southern Bell believes that universal blocking will obliterate one of the major benefits of Caller ID service: the curtailing or eliminating of abusive, threatening, harassing and annoying calls. (Tr. Sims, p. 109).

EXHIBIT II: SHULTZ MEMORANDUM

The second exhibit which Public Counsel entered into evidence is the undated memorandum from W. J. Shultz, Security Staff Manager, BellSouth Corporation, to J. R. Monk, General Security Manager, BellSouth Corporation, with an attached article from the New York Times, dated January 19, 1990. Public Counsel

claimed that the Shultz Memorandum addressed Issue 5 because it discusses the reduction in trap and traces in New Jersey and because it states that New Jersey Bell appeared to be "playing with the numbers." Public Counsel argued that Exhibit II addressed Issue 6 because it describes the similarity of functions and benefits between Caller ID and Call Trace. Public Counsel's response to Order No. 23995, p. 3.

> Public Counsel's comments refer to the New York Times article appended to the Shultz Memorandum which states that: Mr. Pitt [a spokesman for Bell Atlantic Corporation] cited a recent study by New Jersey Bell that shows the number of harassing or obscene telephone calls in New Jersey has declined by half since the introduction of the new [Caller ID] service.

Refarring to that quote, Mr. Shultz concluded that "it appears that thay (New Jersey Bell) are playing with the numbers". Shultz Memorandum. It is obvious that common sense and experience with the newspaper industry should have caused Mr. Shultz to question if the newspaper reporter correctly paraphrased the comments of the Bell Atlantic spokesman or if the spokesman mistakenly provided the wrong information. Rather, Mr. Shultz drew certain conclusions about New Jersey Bell's integrity without questioning the source of the information. (Shultz Dep., pp. 8-10). As noted during the hearing, the New Jersey Bell Caller ID report stated that there was a 50% reduction in traps and traces (Tr. Sims p.

56). More importantly for purposes of this proceeding, the Shultz Memorandum supports Southern Bell's position that Caller ID will discourage annoying calls. Mr. Shultz noted in his memorandum that Bell Atlantic Security employees estimated that Caller ID had resulted in a 10% reduction in annoying, harassing, and obscene calls. (Shultz Dep., at p. 9). Thus, while it is clear that Mr. Shultz' comments regarding the New York Times article are unimportant if not irrelevant, it is also clear that the Shultz Memorandum supports Southern Bell's contention that Caller ID should discourage and reduce annoying, harassing, and obscene telephone calls in Florida.

Public Counsel also argues that the Shultz Memorandum addresses the similarity of Call Tracing and Caller ID because the exhibit notes a decrease in Call Tracing activity in New Jersey as a result of introducing Caller ID. This fact was set forth in Southern Bell's testimony and is not "new information" as Public Counsel suggests. (Tr. Sims, p. 56). Southern Bell's witness Ms. Sims explained that Caller ID and Call Tracing are two different services which provide different benefits.

> While there is a possibility of cross elasticity among the TouchStar features, only Caller ID displays the telephone number of the party who is calling.

(Tr. Sims, p. 66) Call Tracing, a TouchStar Service, allows the customer to activate the system that records the telephone number

associated with the calling party. In order to activate the service, a customer must first answer the call, hang up and then dial an access code. In accord with Southern Bell's Call Tracing tariff, GSST A13.19.2(F): "The customer is not provided with the trace number."

In addition, as Ms. Sims testified during the hearing, Southern Bell performed a survey of customers who subscribed to Call Tracing and discovered that there was a strong desire by the customers to see the telephone number. (Tr. Sims, p. 330) Unlike Call Tracing, Caller ID would immediately disclose the calling number to the called party which would allow the called party to make an informed decision as to how to answer a call or whether or not to answer a call at all.

EXHIBIT III: COX MEMORANDUM

The third exhibit placed into evidence by Public Counsel is a memorandum dated April 25, 1990, from M. E. Cox, Assistant Vice President, Security, South Central Bell, to Pat Casey, Vice President and Comptroller, BellSouth Corporation. The Cox Memorandum regards a complaint in which a customer in Tennessee was referred to the South Central Bell Annoyance Call Center complaining that a woman with Caller ID had been making threatening and obscene calls. South Central Bell responded by

placing trap and trace equipment on the customer's line. Mr. Cox explained during his deposition that the primary reason he wrote the memorandum was out of concern that so many employees were required to handle a single appeal:

> My concern when I read the accompanying letter that came to my desk was that the number of employees that it took to handle this one customer appeal.

(Cox dep., at p.6)

Public Counsel's Response to Order No. 23995 noted that the Cox Memorandum was "a 'prime example' of how the Company may expect a number of customers to react in the future to Caller ID when wrong numbers and misdials occur." Id at p. 3. As Mr. Cox explained in his deposition, it is apparent that the customer subscribing to Caller ID was making abusive calls to another customer and the South Central Bell Annoyance Call Center attempted to deter the abusive calls. (Cox Dep., pp. 7-8). As thoroughly discussed during the hearing, Southern Bell does not believe that Caller ID will eliminate every abusive call, even abusive calls made by subscribers of Caller ID. However, as Southern Bell testified during the hearing, Caller ID will undoubtedly discourage abusive, harassing, and obscene calls (Tr. Sims, pp. 59 and 109).

Moreover, contrary to Public Counsel's argument that Caller ID will result in a "number of customers" using Caller ID to make

abusive calls, the facts have simply not supported such a theory. Mr. Cox told Public Counsel during his deposition that this was the only complaint he had ever received regarding Caller ID:

> Q. Have you continued to get complaints from people about Caller ID, to your knowledge?
>
> A. No.
>
> Q. Would you know one way or the other?
>
> A. Yes.
>
> Q. Okay. And you don't get any complaints at all from people about Caller ID.
>
> A. This is the only one I have ever received, to my knowledge.

(Cox Dep., pp. 8-9)

Nevertheless, it is clear from a review of the Cox Memorandum that it does not contain a "host of new information" as claimed by Public Counsel. Rather than educate the Commission regarding a new significant fact, Public Counsel appears to be using the document to unnecessarily rehash his old argument that Caller ID will not eliminate all abusive calls.

EXHIBIT IV: LANE MINUTES

The fourth document introduced into evidence by Public Counsel is the minutes of the meeting of the Touchstar Implementation Team, dated October 19, 1989. Contained within the minutes is a sentence that states: "Terry Lane also stated

that SCB [South Central Bell] doe [sic] not feel Caller ID will reduce annoying call problems." (Lane Exhibit, p. 3) Public Counsel took the deposition of Terry H. Lane, Security Department Manager, South Central Bell.

Mr. Lane explained that he had been misquoted in the meeting minutes. (Lane Dep., p. 9) He stated that it was his opinion that annoying calls would not be substantially reduced immediately after the implementation of Caller ID:

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

(Lane Dep., pp. 9-10) Public Counsel questioned Mr. Lane regarding the statement in the Lane Document which states that: "Terry Lane requested that CID not be promoted as a way to stop harassing calls." Mr. Lane explained that, as the supervisor of an Annoyance Call Center, he was concerned that customers with Caller ID would incorrectly believe that merely because they had Caller ID that they could call the Annoyance Call Center and the Center would immediately handle an abusive caller reported to them by the Caller ID subscriber. (Lane Dep., p. 10) Mr. Lane

stated that he believed Caller ID would discourage annoying calls but would not entirely eliminate them. However, Mr. Lane emphatically stated that Caller ID would discourage annoying calls:

> It's certainly my opinion, though, that I think Caller ID will discourage people from making certain types of harassing calls.

(Lane Dep., p. 11).

Contrary to Public Counsel's claim in its Response to Order No. 23995 that the document revealed that Caller ID did not reduce annoying call problems, Mr. Lane had given his opinion before Caller ID had been implemented in Tennessee. Mr. Lane further testified that because the Annoyance Call Center serves five states, he was unable to know if Caller ID had reduced annoying calls in Tennessee. In addition, Mr. Lane told Public Counsel that he did not know how Caller ID was advertised. As with other deponents, Mr. Lane does not represent the position or opinion of the Company but merely his own personal opinion.

Regardless of Mr. Lane's opinion regarding the effects of Caller ID on annoying calls, opinions such as Mr. Lane's were thoroughly discussed and examined at the hearing. Public Counsel again appears to be using this opportunity to reargue the same old positions regarding Caller ID. As such, Public Counsel's attempt should be ignored.

EXHIBIT V: WALLACE MEMORANDUM

The fifth document introduced into evidence by Public Counsel is a memorandum dated March 20, 1990, from D. A. Wallace, Florida Annoyance Call Center Manager, Southern Bell, to W. J. Shultz, Security Staff Manager, BellSouth Corporation. Public Counsel argued in its Response to Order No. 23995 that because Ms. Wallace suggested considering $.50, $.75, or $1.00 per Call Tracing activation that the document addressed Issue 6 regarding the rate structure for the TouchStar services. Again, Southern Bell notes that Exhibit V adds very little in terms of "new information" or substance to this proceeding.

Ms. Wallace explained during her deposition that the memorandum contains her opinion and not the opinion of the Company. (Wallace Dep., p. 11) As discussed above with regard to the Dennis Memorandum, employees have different opinions about various issues that vary from one extreme to the other. Ms. Wallace represents one of those many opinions which are useful input for developing a sound, agreed-upon position. However, while suggestions such as Ms. Wallace's are encouraged and appreciated, they are not always adopted for a variety of reasons often unknown to the author of the suggestion.

At first blush, Public Counsel apparently believed that Ms. Wallace would support Public Counsel's position on the rate

structure for Call Tracing. Again, if this was Public Counsel's reason for choosing the Wallace Memorandum, such a reason then can only result in a reargument of Public Counsel's same old position on Call Tracing rate structure and not in providing "new information" as Public Counsel claimed. Ms. Wallace clearly indicated during the deposition that she only spoke for herself, not the Company or even her own department when she prepared her memorandum:

> Q. Do you think the Security Department generally agrees with your opinion?
>
> A. I really can't speak for the whole Security Department.
>
> Q. Well, for whom can you speak?
>
> A. For myself.

(Wallace Dep., p.13). Ms. Wallace further explained that the rates she proposed were "pie-in-the-sky":

> ...You are looking at my rates here to consider what I propose, but it was really pie-in-the sky. There is no substance to these figures.

(Wallace Dep., p.15). After being repeatedly questioned by Public Counsel regarding Company support for her suggestion, Ms. Wallace again answered:

> ...[T]his is my opinion and, you know, the way the Company sets the rates for this type of service, they have a lot more knowledge than I do from all different parts of the

> Company. I just have this little piece of action here in the Annoyance Call Center.

(Wallace Dep., p.16).

Ms. Wallace also explained that she had changed her position regarding a rate structure for Call Tracing since writing the memorandum:

> Q. Would it still be your opinion that it would be desirable to price Call Trace on a per use basis?
>
> A. I have not--I have some other ideas, too. I think the monthly rate that we are charging could, you know, remain as it is. But for those abusers who require over and above... what would be reasonable and profitable, both reasonable for the customer and profitable for us, I think that...maybe we should add on something
>
> * * *
>
> perhaps for the abuser or the service....we would still have the $4 monthly rate, but maybe charge something over and above that for those who are abusing it or causing--say over ten investigations a month.

(Wallace Dep., pp. 16-18)

It is obvious that Public Counsel's offering of the Wallace Memorandum into evidence is a poor attempt to use various suggestions by Southern Bell employees in order to support his same old position. Public Counsel's opinion that Call Tracing should be offered at $1.00 per activation would not support the cost of the service. (Tr, Sims, pp. 90-91, 235-236) Ms. Sims

demonstrated by use of analogy to an alarm service why the monthly flat rate was a proper rate structure for call tracing:

> With an alarm service, you buy an alarm service and you pay a monthly fee for it in hopes that you never have to use it, but you pay that monthly fee. Now, if you had to do it on a per-activation basis, I doubt there would be very many alarm companies in business. (Tr. Sims, p. 236).

While some states, such as New Jersey, offer Call Tracing at $1.00 per call those states offer services that differ significantly from Southern Bell's Call Tracing service. (Tr. Sims, pp. 343-345) For example, in New Jersey when Call Tracing is activated New Jersey Bell instructs the customer through a recording to call local law enforcement department. When a Southern Bell customer uses Call Tracing in Florida, the customer is instructed to call the Southern Bell Annoyance Call Center. Considerable time is spent by Southern Bell's Annoyance Call Center employees investigating the Call Tracing report and taking the appropriate action based on that investigation. It is obvious, therefore, that the active role of Southern Bell, in providing Call Tracing, causes Southern Bell's costs to be more than New Jersey's cost. (Tr, Sims, pp. 345-347)

EXHIBIT VI: ROLLING DOCUMENT

The sixth document moved into evidence by Public Counsel is the Touchstar Implementation Meeting minutes, dated September 10,

1990. Public Counsel believes that this document was important for the Commission to consider because the minutes stated that "two level call return" will not be turned on until Caller ID issues are resolved. Thus, Public Counsel argued that document related to Issue 6 because it discusses an inter relationship between Caller ID and Call Return. Public Counsel's Response to Order No. 23995. Just as the prior five documents added almost nothing new to terms of significant information for the Commission's consideration, this document too adds nothing of significance with regard to the issues to be decided on in this proceeding.

Public Counsel took the deposition of Patricia S. Rollins Cowart, a Southern Bell Staff employee reporting to Ms. Sims, who attended the September 10, 1990 TouchStar Implementation Team meeting. During the deposition, Ms. Rollins explained that "two level call return" is a feature which is operated when a customer activates Call Return service. The feature audibly reads the number of the returned call to the Call Return customer. (Rollins Dep., p. 7) Ms. Rollins explained until there was regulatory approval of Caller ID that two level call return would not be offered by Southern Bell:

> We will not deliver any numbers until the issues surrounding Caller ID are resolved.

(Rollins deposition, p.10). Thus, Ms. Rollins merely testified regarding a service which may be offered in the future and which has no bearing on the matter at hand. While her testimony may educate the Commission about a future service, it is irrelevant for purpoues of this proceeding.

CONCLUSION

As explained above, the documents entered into evidence by Public Counsel do not contain a "host of new information" to assist the Commission in making its determination regarding Caller ID. The Dennis Memorandum is merely an employee suggestion regarding blocking in order to quell the Caller ID debate; the Shultz Memorandum merely provided editorial comments regarding a New York Times article about the reduction of trap and traces in New Jersey; the Cox Memorandum and deposition provided a well-worn opinion that Caller ID would not entirely eliminate abusive callers; the Lane Document and deposition revealed a South Central Bell security employee's concern that the Annoyance Call Center should not be eliminated merely because Caller ID was about to be implemented; The Wallace Memorandum and deposition provided an employee's opinion regarding "pie-in-the sky" rates for Call Tracing; and the Rollins Document explained that "two level call return" was a service that may be offered in

the future once the Caller ID issue was resolved. While each of the deponents stated their own opinions regarding certain issues, none of the deponents provided any significant new information that has not already been thoroughly analyzed through numerous agenda conferences, informal staff workshops, three days of public hearings and two days of formal evidentiary hearings, the introduction of hundreds of pages of exhibits into the record and discovery through interrogatories, depositions, and documents.

In support of Southern Bell's position, the deponents unanimously agreed that Caller ID was a beneficial service. Southern Bell believes that in order for Florida customers receive these benefits, the Commission should implement Caller ID without further procedural delay. Any procedural delay, such as Public Counsel's frivolous demand for additional hearings based on a so-called claim of "host of new information" can only lead to Florida telecommunications customers continuing to receive the volume of annoying calls they are receiving today and being unable to use the benefits of Caller ID technology. In conclusion, Southern Bell requests that the Commission immediately approve Southern Bell's Caller ID tariff and approve limited blocking as recommended by Southern Bell for specified

agencies, their volunteers and other individuals concerned with their personnl safety.

Respectfully submitted.

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