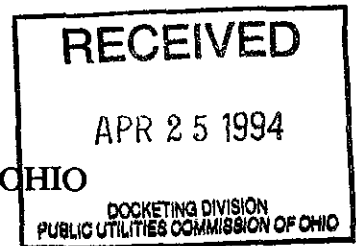


BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Application of)
Ohio Bell Telephone Company for)
Approval of an Alternative Form of)
Regulation and for a Threshold Increase)
in Rates.)

Case No. 93-487-TP-ALT

**OBJECTION TO THE
STAFF REPORT OF INVESTIGATION AND STATEMENT
OF ISSUES OF THE OHIO DOMESTIC VIOLENCE NETWORK**

Pursuant to Ohio Revised Code, Section 4909.19 and Ohio Administrative Code Rule 4901-1-28 the Ohio Domestic Violence Network (ODVN) files its Objections to the Staff Report of Investigation docketed in the above referenced proceeding on March 25, 1994. ODVN submits that these objections meet the specificity requirements of Ohio Administrative Code Rule 4909-1-28. ODVN submits that failure to object to any aspect of the Staff Report should not preclude it from cross examination or introduction of evidence of argument in regard to issues in which the Staff's position changes between issuance of the Staff Report and the closing of the record. ODVN objects to the determinations and conclusions contained in the Staff Report in the following particulars:

1. The Staff erred in failing to recommend that Ohio Bell institute blocking of Automatic Callback calls as one of Ohio Bell's commitments in this proceeding;
2. The Staff failed to make general recommendations requiring Ohio Bell to offer blocking of Automatic Callback as a prerequisite for this service;
3. The Staff erred in failing to recommend free per line blocking for Caller ID;

4. The Staff erred in failing to require Ohio Bell to quantify the cost of blocking for Automatic Callback on either a per call or per line basis;

5. The Staff erred in failing to require Ohio Bell to identify what technologies exist for blocking Automatic Callback;

6. The Staff erred in failing to make a recommendation for universal service so that telephone service is available to low income groups.

7. The Staff failed to require blocking of Automatic Callback as part of the recommendation and commitments that Ohio Bell reach 100% deployment of SS7 technologies.

STATEMENT OF ISSUES

1. Automatic Callback is a service that permits the recipient of a telephone call to dial a code at the conclusion of the conversation in order to reach the original calling party. For a battered woman, the ability to protect the privacy of her location can mean the difference between security and fear, safety and harm, and even life and death. In 1991, law enforcement agencies reported 74,359 incidents of domestic violence to the Attorney General. Those statistics, however, reflect only the reports from the reporting law enforcement agencies and a full 67.9% did not even report statistics. If the reported numbers are a reflective average of the population, one could estimate that there were approximately 230,000 reported incidents of domestic violence in the state of Ohio in 1991. This would not include the staggering number of unreported incidents. For the individual woman attempting to free herself from the chains of violence, protection of her privacy becomes of paramount importance. The batterer will use every tool available to track down


his victim, violating the privacy, peace, and sanctity of her new residence. Automatic Callback provides the batterer with a tool to do so by revealing the location and associations of the victim. Without some form of blocking, victims of domestic violence and other individuals who have very real and legitimate needs for privacy protection are left totally at risk.

It is the position of the Ohio Domestic Violence Network that Automatic Callback should not be injected into our society without the countervailing safeguards such as per call and per line blocking in place. Such measures are in place for Caller ID. There is no legitimate reason to permit a waiver of Rule 4901:1-5-09(H) Ohio Administrative Code so that customers paying for unpublished number service have their phone numbers revealed.

In this proceeding, Ohio Bell is requesting that these Class Services such as Automatic Callback be placed in Cell 3 as discretionary services. The Ohio Domestic Violence Network agrees that these services are discretionary and not basic and necessary to the public. Therefore, given the discretionary nature, the Commission should not allow Ohio Bell to continue forward with these services unless and until it is willing to offer per call and per line blocking under reasonable terms and conditions to the general public. Anything less places the public at risk. Anything less surrenders the safety and perhaps the very lives of women and children to the corporate profits of Ohio Bell. The Ohio Domestic Violence Network believes that one of the commitments that should be required of Ohio Bell in exchange for its right to proceed with alternative regulation is that it put in place blocking protections for all phones so that customers have options and safety mechanisms and protection with respect to Automatic Callback.

The Commission's requirement to have a commitment of 100% SS7 deployment should specifically include the requirement for blocking technologies for Automatic Callback.

Respectfully submitted,


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ON BEHALF OF THE OHIO DOMESTIC
VIOLENCE NETWORK

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objections to the Staff Report and Statement of Issues has been served by first class mail, postage prepaid, or hand delivered to the following parties of record this 25th day of April, 1994.


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