PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Commission Advisory and Compliance Division
Telecommunications Branch

RESOLUTION T-15827
December 20, 1995

R E S O L U T I O N

RESOLUTION T-15827. PACIFIC BELL. (U-1001-C). REQUEST FOR APPROVAL OF CUSTOMER NOTIFICATION AND EDUCATION PLAN (CNEP) IN COMPLIANCE WITH D.92-06-065 AND D.92-11-062 WHICH MUST BE IMPLEMENTED AND MUST THEREAFTER BE SHOWN TO BE EFFECTIVE TO THE COMMISSION'S SATISFACTION BEFORE PACIFIC BELL CAN OFFER CALLER ID SERVICE OR PASS CALLING PARTY NUMBERS (CPN) TO INTERCONNECTING CARRIERS.

BY ADVICE LETTER 17778, FILED ON OCTOBER 11, 1995

SUMMARY

Notice of this matter did not appear on the California Public Utilities Commission's (Commission's) public agenda No. 2936; however, an emergency exists in that Pacific Bell (Pacific) is presently required to comply with Federal Communications Commission (FCC) regulations requiring the passing of customers' calling party numbers (CPN) on June 1, 1996. Moreover, Pacific is required to educate customers about the passage of CPN and the available means of protecting their privacy before CPN is passed or Caller ID service offered through an extensive customer notification and education plan (CNEP) which the Commission must approve.

This resolution authorizes Pacific to implement a CNEP for the passage of CPN and the provision of Caller ID service subject to the conditions imposed in this resolution. Pacific is required to modify the CNEP filed in Advice Letter (AL) No. 17778 in order to create a public education program which focuses on customer privacy and informed consent. As modified and implemented, Pacific's CNEP must meet the Commission's mandate that the disclosure of CPN be the result of informed consent, as ordered in D. 92-06-065 and modified by D. 92-11-062 (44 CPUC 2d 694 and 46 CPUC 482). Through implementation of the modified CNEP, Pacific should initially attain the reasonably achievable customer awareness levels indicated in this resolution, with a target of 100% customer awareness for ongoing education efforts.

BACKGROUND

In 1992 the Commission authorized Pacific, GTE California Incorporated and Contel of California, Inc. to offer Caller ID service to their customers. In so doing, the Commission took

steps to assure that the service, which allows the calling party's telephone number to be displayed to the called party, would be offered consistent with constitutional and statutory rights of privacy of California citizens. The Commission authorized a choice of blocking options, free of charge, for all customers to prevent nonconsensual number disclosure. For customers dissatisfied with their initial assignment of a blocking option, it granted one free change of this blocking option. It also outlined requirements for rigorous CNEPs informing customers about the passage of CPN and the available blocking options.

Recognizing, however, that despite its thorough education requirements, some customers would necessarily remain unaware of the message or fail to understand it, the Commission added a per line blocking default safety net. It provided that any customer with a nonpublished or unlisted number and any emergency service organization which failed affirmatively to indicate a blocking choice to its local exchange carrier would automatically be assigned the option of per line blocking with per call enabling.

Under the Commission's decisions, each respondent local exchange carrier is required to file its proposed CNEP with and obtain approval of its CNEP from the Commission before implementing a CNEP. Additionally the Commission's decisions authorize the Commission Advisory and Compliance Division (CACD) to hire a consultant to assist it in evaluating the telephone company proposals. After the approval and subsequent implementation of a CNEP the utility must provide a showing to the Commission, subject to approval by the Commission, indicating compliance with the adopted customer notification and education requirements and providing evidence that all customers have been informed of pending Caller ID service, including the passage of CPN and the available blocking options.

Until recently the utilities have declined to offer Caller ID service, pursuing instead Federal preemption of certain aspects of the Commission's conditions for offering Caller ID service. On June 5, 1995 the FCC issued its interstate Caller ID rules in Common Carrier Docket No. 91-281. The FCC substantially deferred to California and all other states, stating that individual state blocking regimes should apply to interstate calls so long as minimum federal privacy standards are met. However, the FCC preempted California's per line blocking default safety net. This preemption is under appeal by the Commission. Regarding customer education, the FCC adopted the Commission's informed consent standard and deferred to states to determine, in light of special circumstances applicable to a particular state, appropriate requirements for achieving effective education.

The FCC's order required all local exchange carriers to begin passing CPN to interconnecting carriers on December 1, 1995. In response to this requirement Pacific filed on July 6, 1995 a Motion for Approval of Customer Notification and Education Plan. The assigned Commissioner issued a ruling on July 18, 1995 denying Pacific's motion, finding that its proposed CNEP, on its

face, did not comply with the Commission's CNEP requirements. The ruling stated its expectation that Pacific would file with the FCC a request for a six month waiver of the December 1, 1995 requirement to begin passing CPN.

Pacific provided staff a revised CNEP dated August 25, 1995. This draft was also submitted to community based organizations, public agencies and others for written comment, as well as participation in two workshops, held in San Francisco on October 3, 1995 and in Los Angeles on October 5, 1995. These workshops were required in the Commission's Caller ID decisions which stated that:

> "applicants shall hold workshop(s) which will be open to all those interested, to review and comment on the [CNEP] plan prior to filing; we expect that applicants will modify their draft to reflect comments received, prior to filing." (D. 92-06-065, Ordering Paragraph 9; 46 CPUC 2nd 482, 491)

On October 4, 1995, CACD entered into a contract with an independent consultant to assist it in evaluating Pacific's and other respondent utilities' CNEPs. Pacific filed its current proposed CNEP with AL No. 17778 on October 11, 1995. The consultant issued its report to CACD on November 21, 1995. On December 1, 1995, in response to the filed waiver requests of Pacific and other California carriers, the FCC granted a six-month stay of its order requiring the passage of CPN on calls originating in California in order to allow California carriers sufficient time to complete required customer notification and education.

On November 29, 1995, CACD staff met with representatives of Pacific to discuss the procedures for the Commission's approval of its CNEP on December 20, 1995. At that meeting, representatives of Pacific suggested that the urgency of the CNEP approval included in the Advice Letter was no longer important given the FCC stay. Citing the need to expedite the approval process, CACD staff declined the offer of changing the approval to a later Commission agenda.

NOTICE/PROTESTS

Public notice of Pacific's Advice Letter appeared in the Commission's Daily Calendar on October 18, 1995. CACD received one protest, filed by Utility Consumers' Action Network (UCAN) on October 19, 1995, a limited protest filed by the Division of Ratepayer Advocates (DRA) on October 23, 1995 and comments submitted on October 19, 1995 by the Privacy Rights Clearinghouse (PRC).

UCAN

UCAN recommends that the Commission reject Pacific's CNEP, stating that Pacific's CNEP ignores the Commission's directive to educate the public about privacy impacts of Caller ID. Instead, UCAN states, the ads and other materials still appear

to promote Caller ID service and downplay the privacy concerns expressed by the Commission and endorsed by consumer groups. UCAN states the following reasons for finding the CNEP inadequate:

- It fails to adequately convey the message that Caller ID impacts customer privacy.
- Many media messages actually discourage consumers from electing blocking protections by portraying blocking as "sneaky" or "hiding something."
- The CNEP outreach efforts are targeted to miss connecting with those who most need to understand Caller ID.

DRA

DRA's limited protest raises several issues. First, DRA finds that the CNEP is not in compliance with the Commission's Caller ID decisions as it fails to offer the ordered per line blocking default. DRA believes the Commission cannot approve Pacific's CNEP in violation of its own decision. DRA suggests the Commission might order Pacific to prepare an alternate CNEP with per line blocking as the default option, as required in its decisions. Alternatively, the Commission might conditionally approve both CNEPs, pending the outcome of the court appeal.

DRA also finds that Pacific's projected customer awareness of blocking options and number delivery, is too low. DRA recommends that the Commission adopt the 95% awareness level which DRA proposed in the proceeding and which it believes is consistent with the Commission's goal of informed consent by all customers allowing their numbers to be disclosed. DRA recommends that Pacific continue to offer its CNEP after the offering of Caller ID service and passing CPN until 100% unaided awareness of the service is achieved.

DRA also recommends that Pacific not be allowed to recover through the price cap mechanism any additional cost of continuing the CNEP and, if it does, Pacific should modify its rates and charges for Caller ID service to include this incremental cost.

Other issues raised by DRA include: (1) Pacific's CNEP should be modified to reflect Commission policy concerning charges for changing blocking options. After one free change, a customer should be charged for any additional changes. (2) Pacific should indicate that "private number" display may result in the called party not answering the phone. (3) With no supporting documentation for its proposed CNEP budget available, DRA was unable to review whether the proper budget amounts were allocated for various CNEP categories

PRC

PRC believes the privacy message in the CNEP does not convey a sense of urgency. Second, PRC states the CNEP's consumer education texts neglect to provide sufficient information so people can understand why they would want to block their number.

PRC provides suggestions on how the bill insert, privacy brochure and choice ballot should be revised to provide more in-depth information about blocking options. Additionally PRC praises Pacific for including a "serious" message about Caller ID in its full-page newspaper ad and makes suggestions for making it more readable. It also recommends that Pacific consider statewide consumer education outreach programs for funding Regarding the evaluation process, PRC suggests that Pacific probe for accuracy of customer information about Caller ID as well as awareness.

Pacific's Response

Pacific filed a response to UCAN, DRA and PRC's protests and comments on October 31, 1995. Pacific rejects the recommendations of UCAN and PRC concerning the focus of its campaign, i.e., that it needs to provide a greater focus on privacy issues. Pacific states that UCAN's suggestion that its CNEP should describe potential privacy problems presented by Caller ID would be inconsistent with the Commission's requirements for customer education as it would completely revise the structure of customer education. Pacific further justifies its proposed approach, which attempts to get the viewers' attention through humor and very specific informative messages, as being consistent with the Commission's original Caller ID decision. Pacific believes UCAN's proposed approach would not be as effective at capturing viewers' attention.

Regarding UCAN's belief that Pacific's media scripts are biased against blocking, Pacific states that it has not attempted to discourage blocking but rather has tried to make the scripts humorous, in an attempt to get the viewers' attention. Pacific's scripts were designed by advertising professionals who understand humor and are experienced at capturing the viewers' imagination.

Regarding PRC's recommendations, Pacific states that providing reasons why customers may want to block number delivery would significantly alter the approach that has been designed, and in order to provide this detail it would have to change the media plan to emphasize long public service announcements rather than attention getting spots.

Regarding DRA's suggestion that the Commission should require an alternate CNEP would, according to Pacific, invariably result in significant delay to passage of CPN, therefore, this suggestion should be dismissed

Responding to DRA's recommendation concerning customer awareness levels, Pacific states that it is committed to undertake a

campaign that is significantly greater than all awareness efforts conducted in other states and at considerable cost ($33 million). It also states that it is important to be realistic about the response it will get with its awareness survey, i.e., that consumers will only recall a limited amount of information about telephone service.

Pacific appears willing, however, to adopt certain specific recommendations on language proposed by the protestants, if the Commission agrees to such modifications.

ADDITIONAL PUBLIC COMMENT NOT BROUGHT TO THE COMMISSION

Comments on Caller ID education needs and on Pacific's proposed CNEP have also been provided to Pacific through its workshops and focus groups. Pacific has summarized them in a description of these events. Many of the comments reflect the concerns raised by protestants and the consultant.

CONSULTANT'S EVALUATION OF PACIFIC'S PROPOSED CNEP

The consultant evaluating Pacific's CNEP, Dr. Dervin, is an expert in public education communications. Dervin found that Pacific's CNEP will not succeed in satisfying the Commission's mandate as it is essentially an advertising/marketing based campaign, not a public communication/education campaign. Although Dr. Dervin found elements of Pacific's campaign which attempt to remain neutral and inform customers regarding privacy issues related to passing CPN, she believes that the CNEP, when taken as a whole, avoids, downplays and trivializes the emphasis on privacy and informed consent mandated by the Commission's and the FCC's orders.

The primary starting point and focus of the entire CNEP, the consultant recommends, should be assisting customers in handling their privacy concerns, deciding when and how to protect their phone numbers and knowing how to implement their choices. Dr. Dervin recommends that this must be the focus of the entire CNEP, the foundational base on which all other campaign components must rest.

The consultant criticizes Pacific's plan for a lack of evidence of data-based decision making, particularly in designing strategies for reaching specific target groups. The consultant also observes that there is no mention of specific needs of unlisted and nonpublished subscribers nor a contingency plan, should default per line blocking be reimposed by a court decision overturning the FCC's preemption order.

Additionally, the consultant finds virtually no attention given to the education demands of the Commission's mandate. It is also observed that Pacific's proposed success measurement does not follow current thinking of what is possible for public communication campaigns as the goals are too modest Additionally, the consultant believes that the CNEP's proposed orientation to measurement does not meet the spirit of the

Commission's mandate. Last, the CNEP lacks clear evidence of any openness to outside input from the workshops, focus groups, and letters.

In order to satisfy the Commission's informed consent mandate, the consultant's recommendations, as interpreted by CACD, include the following principles/actions to structure Pacific's CNEP as a public education campaign:

- o Establish the primary starting place and focus of the entire campaign as one of assisting customers in handling their privacy concerns, with deciding when, how and why to protect their phone numbers with CPN passage
- o Do analysis of all input, evaluations and testimonies submitted before and after CNEP development for development of customer information needs
- o Develop and test one set of core materials for use in all campaign materials, including a core set of terms and definitions
- o Develop an ordered set of component messages
- o Develop and test a foundational campaign message
- o Develop the bill insert based on foundational message, emphasizing privacy
- o With collaborative industry wide efforts, seek state wide use of message elements
- o Do a data-based discovery of target groups, including name, geographic distribution, demographic differences from general population, lifestyle differences from general population and culturally important factors relating to phone and privacy for use in developing strategies and evaluation criteria for community outreach effort
- o Increase the community outreach budget through reallocation of proposed media budget
- o Use awareness, understanding and action criteria for evaluation purposes
- o Set outcome goals of 70% aided awareness that numbers will be passed; 60% volunteered understanding of options for blocking and overrides; 30% submission of choice ballot
- o Focus on choice ballot as primary and most important evaluation tool
- o Send blocking option confirmation letters to all customers as soon as possible after choice is registered by customer or default option is assigned by carrier;

include information that if confirmed blocking option is unsatisfactory, customer may request one free change of blocking option

- o Develop iterative path for the campaign including expectations of where attention is focused, reevaluation points, planned outcome measurements
- o Expand 800# program to include both a comprehensive set of "answer my question" sub-tracts as well as interactive sub-tracks
- o Develop incentives for customer actions including sweepstakes
- o Install permanent message on bill which provides privacy status
- o Design customer-oriented phone interfaces between customers and employees and reallocate media budget to support this
- o Involve community representatives in co-production of messages and other key materials for their clients
- o Diversify the media program
- o Reorient general media advertising campaign to public service ads
- o Send letter to unlisted/nonpublished customers explaining privacy issues of CPN passage and status of per line blocking default
- o Include proposed letter to unlisted/nonpublished customers announcing reinstatement of per line blocking default as contingency pending outcome of litigation
- o In conducting awareness surveys, include nonpublished and unlisted subscribers as a separate and distinct survey subgroup

DISCUSSION

CACD's ultimate recommendation to the Commission is guided by our Caller ID decisions. It cites two aspects of these decisions as follows: (1) the emphasis we placed on notifying and educating customers to achieve "informed consent," and; (2) our direction that the "customer messages ordered by [the Caller ID] decision shall not be sales messages. They shall provide objective, neutral information on both the services themselves and how consumers can make informed choice about these changes." (D.92-11-062, Ordering Paragraph 7.e., 46 CPUC 2d 482, 492).

Pacific contends that changing its program to a public education campaign would completely undermine the structure of its proposed education plan. Pacific also states that it would have

to change the media plan to emphasize long public service announcements rather than attention getting spots. We view this as an admission that its CNEP design lacks the objectivity and neutral information content that we require of the Caller ID education campaigns.

However, we do not believe Pacific's proposed CNEP is so flawed as to have ignored our directive to provide objective, neutral information. Certain modifications can remedy such deficiencies. To that end, we adopt the recommendations of the protestants, commenter and consultant, as described more fully herein, with the following exceptions:

DRA's recommendation of a separate CNEP incorporating the per line blocking default either as an alternate CNEP or a replacement CNEP is rejected, as this would not be efficient in terms of the approval process or in meeting the current FCC deadlines for passing CPN. We believe that requiring Pacific to include a contingency plan in its revised CNEP, should the per line blocking default be reinstated, will satisfy DRA's concerns and meet our objectives.

Regarding DRA's recommendation that Pacific be required to obtain an initial 95% awareness level for its customers, we agree that the our informed consent standard applies to all customers affected by CPN passage. However, the expert consultant has indicated that, at least initially, 100% awareness is not reasonably attainable. Therefore we reject DRA's recommendation.

The consultant has indicated that initial awareness levels for CPN passage of 70% aided awareness, 60% volunteered understanding of blocking options and 30% action (affirmative choice by return of a ballot or order through an 800 number) are reasonably attainable. We therefore require Pacific to attain these initial awareness levels before CPN is passed or Caller ID service is offered. If it appears that these awareness levels will not be attained prior to June 1, 1996, the burden shall be on Pacific, well in advance of that date and in any event no later than May 1, 1996, to explain why the levels cannot be attained and to provide CACD with a plan for attaining those levels in a timely manner.[1] Moreover, we expect that Pacific

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1 While we are deeply concerned that the initial awareness standards we set herein may result in the nonconsensual disclosure of the CPN of a significant number of California citizens, we cannot require Pacific to do that which is not reasonably possible. The inability of any short-term education program to attain 100% awareness is the reason why we adopted our "safety net" per line blocking default for nonpublished and unlisted subscribers, who pay the local exchange carrier each month for heightened privacy.

can and will eventually attain a 100% level, or very close to it, through its ongoing public education effort.

We recognize that Pacific is committing itself to a large expenditure of money for its CNEP and has made several revisions of its draft CNEPs in order to improve it. Additionally, we are impressed by Pacific's commitment to subcontract with community based organizations. Unfortunately, however, the evaluations both of lay members of the public and of communications experts lead us to conclude that Pacific's proposed approach will not succeed in satisfying our informed consent goal. We concur with the observations and recommendations of the consultant and subcontractors that Pacific must develop and implement a public education campaign in order to be successful.

CACD set forth this opinion to Pacific in a deficiency letter written on November 22, 1995, urging Pacific to take action described in the attached consultant report in order to develop a CNEP which CACD could approve. We are pleased to note that Pacific agreed in writing to CACD to commit to adopt the consultant recommendations, although we are concerned that it did so asserting that its compliance would be subject to certain constraints.

Pacific is concerned that the consultant's recommendations would lead to a higher CNEP costs. We do not intend to dictate a budget level for Pacific or any utility complying with our orders. We will not agree, however, that any consultant recommendations or other measures identified by Pacific as necessary to attain minimum awareness levels be dismissed out of hand. Additionally we question Pacific's concern about exceeding its $33 million budget when it will be receiving Z factor recovery for $23.6 million of this budget. See today's Commission action regarding AL 17762.

The consultant report recommended that a statewide CNEP approach, whereby all utilities would utilize the same slogans, messages, and the like, should be developed. Our Caller ID decisions also require all utility education efforts to be as similar as possible (46 CPUC 2d 482, Attachment 1, 492, Ordering Paragraph 7.d.). We anticipate that the resources to develop and implement this statewide material, if such an approach proves feasible, may be shared, at least to some extent, by all utilities. Other cost saving approaches are recommended in the report.

Regarding the timing of the CNEP, we are very aware that the FCC has granted a stay of the requirement of passing CPN until June 1, 1996 and we will not intentionally permit Pacific to unreasonably delay this CPN passage date. However, it should be clear by now to Pacific that we consider our primary responsibility under the Caller ID decisions to assure development and implementation of a successful CNEP which informs customers of privacy concerns and rights attending CPN passage and Caller ID service offerings.

A final issue is whether we should establish target levels for customer awareness, understanding and action. Our goal, stated repeatedly in our decisions, is that that disclosure of a calling party's telephone number be the result of informed consent. This means that all customers understand the implications of calling number identification services and are able to take any needed actions to protect their privacy under statutory and constitutional law.

As indicated above, 100% initial awareness is not reasonably attainable. We will require initial awareness levels for CPN passage of 70% aided awareness, 60% volunteered understanding of blocking options and 30% action. Consistent with the consultant's recommendation, we believe that these are reasonably attainable awareness levels.

If these awareness levels are not attained prior to June 1, 1996, the burden shall be on Pacific to explain why and to provide CACD with a plan for attaining those levels by that date. Moreover, we expect that Pacific can and will attain a 100% level, or very close to it, through its ongoing public education effort.

We adopt these levels as minimum levels, particularly given the potential loss of the Commission's safety net per line blocking default included in our Caller ID decisions. Moreover, we find that the responsibility for attaining these awareness levels must be on the carrier. If Pacific believes for any reason that the program, as modified by the consultants' recommendations, will not succeed in attaining these levels on or before June 1, 1996, it will be Pacific's burden to take such additional steps as it deems necessary to assure that those awareness levels are met on a timely basis.

We will not allow Pacific or any other utility to go forward in offering Caller ID or passing CPN, if the carrier's showing fails to meet the standards herein stated.

We believe that Pacific's plan will succeed if the company revises its CNEP to a public education rather than a product marketing campaign, aggressively implements its program, and takes such additional steps as the company believes necessary to achieve the required awareness levels.

We concur with the consultant's and protestant's recommendations and direct Pacific to submit a revised CNEP to CACD. This revised CNEP should reflect Pacific's consideration and adoption, if feasible, of all the report recommendations, summarized in the above discussion of the consultant report, as well as all steps which Pacific believes necessary to attain the awareness standards herein adopted.

FINDINGS

1. Pacific Bell filed its proposed Customer Notification and Education Plan (CNEP) on October 11, 1995 as required by Decision 92-06-065 and Decision 92-11-062 before it may offer

Caller ID service or pass calling party number (CPN) to interexchange carriers.

2. The Federal Communications Commission (FCC) in its reconsideration order of Rules governing interstate Caller ID (Docket 99-11) granted states discretion to adopt customer notification and education plans prior to the passage of CPN.

3. The Caller ID decisions (D. 92-11-065, 44 CPUC 2d 694, and D. 92-11-062, 46 CPUC 2d 482) authorizes the Commission Advisory and Compliance Division (CACD) to hire an independent consultant to assist it in the evaluation of utility filed CNEPs.

4. CACD hired a consultant on October 4, 1995 to assist it in evaluating Pacific Bell's CNEP.

5. The consultant's report evaluating Pacific's CNEP was provided to CACD on November 21, 1995.

6. We concur in findings that Pacific's CNEP would fail to satisfy the Commission's and the FCC's mandate for educating customers about intra- and interstate Caller ID service unless it were revised to constitute a public education campaign with a focus on privacy rather than a product marketing campaign.

7. We believe that the consultant's report recommendations will result in a successful CNEP.

8. Protestants' comments to Pacific's Advice Letter are approved or rejected as discussed.

9. In a deficiency letter CACD sent Pacific on November 22, 1995, CACD informed Pacific that it agreed with the consultant's report findings and summarized the report recommendations. CACD advised Pacific to implement the recommendations in order to successfully educate its customers about privacy issues related to Caller ID service.

10. Pacific's written response to CACD on December 4, 1995 indicated its willingness to revise its proposed CNEP under certain conditions.

11. Pacific must include in its revised CNEP all steps it believes are necessary to attain the initial awareness standards set forth in this resolution.

12. Pacific bears the responsibility for attaining on or before June 1, 1996, the initial awareness standards set forth in this resolution.

13. Pacific's revised CNEP shall include a timeline demonstrating how it will implement its CNEP and attain the required initial awareness levels prior to June 1, 1996.

THEREFORE, IT IS ORDERED that:

1. Pacific Bell (Pacific) is authorized to implement its Customer Notification and Education Plan (CNEP) upon satisfactory compliance with the following conditions:

2. Pacific shall provide the Commission Advisory and Compliance Division (CACD) with a revised CNEP for its approval. The revised CNEP shall constitute a public education campaign with a focus on privacy as recommended in the consultant's report provided to CACD. Pacific's revised CNEP shall contain the recommendations made in the report, as summarized in this resolution, as well as a description of any additional steps which Pacific believes necessary to attain the initial awareness levels herein stated. Pacific's revised CNEP shall also include a timeline demonstrating how it will implement its CNEP and attain the required initial awareness levels prior to June 1, 1996.

3. Pacific shall provide to CACD within 10 days after the effective date of this resolution a timetable for revising and filing its CNEP. In order to facilitate completion of its CNEP, Pacific shall provide CACD with weekly progress reports.

4. As Pacific revises its CNEP it shall consult with the Public Advisor on its proposed bill insert.

5. Pacific shall modify its CNEP to allow only one free blocking change per customer consistent with the Commission's decisions.

Because it is necessary to facilitate expeditious implementation of customer education relating to Caller ID service and the passage of calling party number (CPN), this resolution is effective today.

I hereby certify that this resolution was adopted by the Public Utilities Commission at its regular meeting on December 20 1995 The following Commissioners approved it.

Wesley Franklin

Wesley M. Franklin
Executive Director

DANIEL Wm. FESSLER
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