

Office of the Secretary
Comment FTC File No.P994414
Federal Trade Commission
Room 159
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Telemarketing Review- Comment FTC File No.P994414

1. Bell Atlantic Corporation (“Bell Atlantic”) submits these comments in response to the request by the Federal Trade Commission (the “Commission” or “FTC”) for public comments with respect to FTC’s Telemarketing Sales Rule (“the Rule” or the “TSR”) published in the Federal Register on February 28, 2000.
2. Bell Atlantic Corporation is at the forefront of the telecommunications and information industry with nearly 44 million access lines. Bell Atlantic markets many of its products and services through telemarketing which is a critical element in our sales efforts. Although many of Bell Atlantic’s companies are exempt from regulation by the Commission as common carriers, we are concerned with this issue and have made every effort to assure that consumers have a high awareness of the Rule and their rights under it. Our goal has been to protect consumers from harassing or unscrupulous telemarketers.

The Rule is Functioning Well

3. Telemarketing is an essential tool to enable Bell Atlantic to communicate with our customers. Most of our customers are receptive to our calls and appreciate learning

about offers for new services. Of course, we do not wish to contact customers who do not wish to be called and maintain a do-not-call list of customers who have requested they be placed on it. In fact, we go beyond the TSR to include business customers in our do-not-call policy. In addition, we offer customers do-not-mail, do-not-survey, and do not e-mail options. This allows customers to customize their relationship with us and tell us how they do or do not wish to be contacted.

4. The TSR has become a way of life for American businesses and consumers. It has proven extremely valuable as both a guide and as a means by which consumers can enforce their rights to privacy and fair dealing. Since the Rule became effective, both consumers and businesses have demonstrated a high degree of awareness of the existence and requirements of the Rule. Bell Atlantic has made every effort to assure that all customers know about the Rule and how to make use of it. Periodically, Bell Atlantic provides to its customers brief explanations of portions of the TSR. Enclosed as Exhibit A are numerous examples of such explanations which are periodically mailed to our residential customers. Additionally, our White Pages directory (a sample of which is attached as Exhibit B) contains information with respect to telephone solicitation and consumer rights under the TSR. Our own efforts at educating consumers about the Rule have included working with governmental organizations and various consumer groups. We have been especially vigilant to advise consumers of ways in which unethical telemarketers engage in fraudulent practices.

5. Our customers demonstrate a high degree of awareness of the TSR and exercise their rights under it and the parallel FCC regulation. On average, across our region, approximately 20% of our customers are on BellAtlantic's Do Not Call list. We maintain records of complaints with respect to our telemarketing activities and those of our vendors which market our services to consumers. Our experience demonstrates that our customers who wish to be placed on the Do Not Call List ask for such treatment within a very short time after answering a call from our telemarketing representatives. Other customers, who welcome our calls are equally clear in their wish to obtain more information about the products and services we offer. Our customers are acutely aware of both the TSR and how to take advantage of it.

The Commission Should Make Every Effort to Assure That The
Rule Continues to Function Well

6. Bell Atlantic believes that there are numerous threats to the continued efficacy of the Rule, each of which we will address in these comments. We believe that the continued efficacy of the TSR is dependent upon the certainty of consumers and telemarketers with respect to the rules which must be followed, the ease with which systems can be created to comply with the Rule, and the protection of the rights of both telemarketers and consumers.
7. The smooth operation and enforcement of actions required by any regulation or statute is dependent upon the parties responsible for such compliance being made

aware of their rights and responsibilities with respect to the regulation in question. With respect to the TSR, numerous other statutes and regulations provide nothing more than confusion to both telemarketers and consumers. We believe that the consumers have been well and fairly protected by the Rule and that the businesses which engage in and are dependent upon telemarketing have respect for the Rule and its requirements.

8. However, there are now more than 22 states which impose on telemarketers requirements which are different from those of the Commission's TSR. These varying and differing requirements provide no further protection for consumers, but do engender a great deal of confusion among firms that engage in telemarketing in multiple states. Many of these differing requirements relate to permissible times and days on which calls are permitted. Some of the variations deal with the binding nature of the purchase commitment made by telephone sale.

9. We believe that the most burdensome and intrusive regulation attempted or proposed to be imposed by states is the maintenance of statewide Do Not Call lists. There is no reasonable explanation for imposing this burden on all industry. Many customers who do not wish to be contacted by one telemarketer would be grateful to receive calls and hear of new products marketed by another company. Moreover, for a national marketer, such a regulation means the maintenance of numerous lists which may be duplicative and may actually deprive consumers of information

which they would be pleased to obtain.

10. Bell Atlantic currently maintains a Do-Not-Call list for each of its regulated telephone companies. This list is comprised of customers who have requested removal of their names from all telemarketing efforts. Bell Atlantic customer contact personnel are very familiar with the process by which names are added to this list. The list is utilized for all marketing campaign efforts and a “scrub process” is implemented to suppress customers who have requested they be placed on our Do Not Call List. The key to this successful process is having centralized Do Not Call tables within our computer system to assure the deletion of the “do not call” names from all marketing lists. The impact of having separate state lists would have a negative impact on the process both logistically as well as financially. Our current estimated cost to add a single name to our Do Not call List is \$2.17. To do so for numerous and separate lists is a cost we cannot estimate.

11. To force Bell Atlantic to run separate State queries would delay the time to market for new products and services in an already competitive landscape. Additionally, separate data tables would need to be sized and developed in our computer systems. Those costs could exceed \$250,000 for the initial set up of each additional list and \$25,000, just for the annual maintenance of each such list.. We believe that such an additional burden on industry is both unwarranted and without any real function. Additionally, such added expense poses an unwarranted barrier to the operation of

smaller firms which may wish to market their products through telemarketing.

12. Some of the varying state legislation requirements relate to the manner in which a polite dialogue may take place. Some statutes in states which have different requirements from the Rule prevent the telemarketing representative from responding to customers' questions and prevent additional information from being provided to overcome a customers' objections to a product about which the customer is ill-informed. Other such statutes provide different times and days from the TSR when telemarketing is permitted or prohibited. All such varying legislation imposes undue burdens on telemarketers simply by imposing different standards and limitations for each jurisdiction. Such variances inevitably result in confusion and expense with different scripts, times and prohibitions for each jurisdiction.
13. We would urge that the Commission discourage states and other jurisdictions from forcing upon industry such overly burdensome legislation and regulation. We believe that the current Rule provides sufficient protection to consumers and additionally provides definition and reliable guidance to business.

Experience Should Enable Further Exemptions From The Rule

14. Since the effective date of the Rule, many telemarketers have learned how to market their products more effectively over the telephone. Part of that education has been with respect to the power of a money back guarantee. Many of the statutes which impose additional burdens upon business relate to the avoidance of binding

commitments by consumers. These statutes require that a writing be executed within a given period of time by the consumer before a sale is binding. While we understand the intent of such a requirement, we believe that it imposes undue burdens upon business and that it may additionally impose unforeseen burdens on consumers. Many consumers wish to take advantage of a product or service long before a contract can be sent to them and returned to the company signed by the consumer.

15. We believe the same objectives of reducing both sales pressure and the binding nature of any commitment could be achieved by reducing record keeping requirements as well as penalties for businesses which provide a money back guarantee to consumers. When money back guarantees are provided, a 12 month, rather than a 24 month record keeping requirement would be sufficient. We believe this would provide an incentive to businesses to offer such guarantees and to advise consumers that such guarantees are available.

Consumers Can Now Benefit From Advanced Telephone Feature Technology

16. Since the inception of Caller ID, which enables consumers to identify most calls which are made to a line equipped with that feature, consumers who wish to avoid telemarketing calls have been more easily able to distinguish calls they wish to receive from those they wish to avoid. This technology enables the called party to identify the calling party by name and number prior to answering the telephone. The technology can be further enhanced when a consumer opts to also use a service

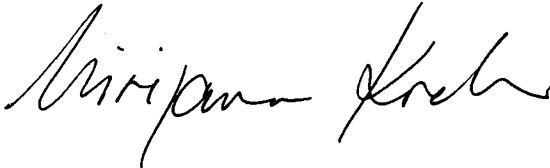
which blocks all calls where the caller has deliberately blocked the name and number from appearing on caller ID equipment.

17. Many telemarketing firms use equipment which cannot transmit caller ID information. Use of a large “trunk side” connection, while cost effective for making many calls, does not permit the use of caller ID. Calls from these telemarketers are not blocked by the service which is currently available.
18. However, Bell Atlantic intends to introduce a new feature very shortly which will expand a consumer’s ability to restrict callers and will enable consumers to obtain further assistance in identifying and rejecting unwanted calls of any nature. The new service, known as “ Call Intercept,” restricts any unidentified call by intercepting it and requiring that such unidentified callers record their identity. That recording is then provided to the customer who can choose from a number of options if he or she does not wish to speak to the caller. One of the customer’s options is to have the service play a request to be put on the caller’s do-not-call list.
19. As noted, many telemarketers use technology that cannot transmit caller ID information. However, some telemarketers may use “line side” connections that are capable of passing caller ID information, but may “block” its transmission. To the extent that is occurring, the Commission should consider prohibiting telemarketers from using caller ID blocking services or otherwise intentionally blocking transmission of Caller ID information.

The TSR is fulfilling its Purpose

20. Industry has made the FTC's TSR a very effective tool for consumers and has made the Rule a useful measure by which to assess voluntary self-regulatory efforts. We believe that the Rule has fulfilled and continues to fulfill its function and its existence has encouraged self-regulatory efforts by industry. We further believe that the Rule is entirely sufficient for its purpose of protecting consumers from unwanted calls and that additional, sometimes conflicting rules or legislation serve no useful purpose.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mirijana Kocho". The signature is written in a cursive, flowing style.

Mirijana Kocho
Counsel,
Bell Atlantic Corporation

What's Inside New York

Take the Bell Atlantic Luge Challenge . . . 1

Discount Offer when You Order Online . . . 2

National 411 . . . 2

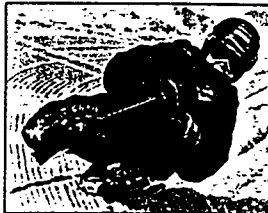
Anonymous Call Rejection Service . . . 3

Discount Skiing Coupons . . 3

Consumer News . . . 4

- Telemarketing Protection Tips
- Direct Payment Option
- Dig Safe

It's safe, it's fun and it's a one-of-a-kind experience.



Discount Offers to Participating Bell Atlantic Luge Challenge Mountains Take the Luge Challenge & Win Great Prizes!



Experience the thrill of speeding down a mountain track on a special luge this winter when the *Bell Atlantic Luge Challenge* comes to three northeastern ski resorts:

- Ski Windham** Windham, NY February 12 – 13
- Waterville Valley Resort** . . Waterville Valley, NH . . . February 26 – 27
- Okemo Mountain** Ludlow, VT March 11 – 12

The Bell Atlantic Luge Challenge uses a modified version of a Luge sled — used in the Olympics — on snow, and gives kids (10 and over) and adults the chance to feel, firsthand, the excitement of Luge. It's safe, it's fun and it's a one-of-a-kind experience. You'll learn how the pros do it from world-class coaches, meet U.S. Olympic Luge athletes and learn about the world's fastest winter sport.

Best of all, you'll compete for valuable prizes including: Lacrosse boots, Bogner ski vests, Uvex goggles, Luge sleds (replica), Duofold turtlenecks and Fox River socks — and participation is free.

So how fast can you go? Come out and take the Luge Challenge!

See discount coupons on page 3!

Registering at Our Website Has Many Rewards.



As you may know, the Bell Atlantic website is packed with valuable information about our products and services, plus limited-time offers designed to save you time and money.

Our website is a valuable resource. And right now, when you register at www.BellAtlantic.com/online, you'll automatically enjoy additional benefits, including:

- An exclusive discount offer just for our online users
- Special online benefits such as being able to view your bill or send questions to Bell Atlantic customer service representatives
- Ordering products and services online

So even if you've visited the Bell Atlantic website before, now is a great time to go back. To register, simply visit www.BellAtlantic.com/online and follow the easy-to-use prompts.

Find Old Friends in the New Millennium.

Dial 411 for directory assistance anywhere in America.

Don't let another millennium slip by without getting in touch with those old friends around the country you've been thinking about. Just dial 411 for local and national directory assistance anywhere in America. It's fast, it's friendly and it's easy.

The only number you need to know is 411. You don't even need an area code. Just give the name, city and state of the listing you're looking for.

National listings are only 95 cents, which includes up to two listings per call. Within your existing local directory assistance calling area, the rate is still only 45 cents per listing.

So for directory assistance across the country or across town, just dial 411.



Now, Caller ID Customers Have Even More Control.

With Anonymous Call Rejection, you won't have to put up with "private" calls anymore.

Caller ID is a convenient service that helps let you know who's calling before you pick up the phone. But some callers block their name and number, so when they call all that shows up on your Caller ID box is "anonymous," "private," or "blocked."



Anonymous Call Rejection is easy to use and FREE to Caller ID subscribers. Simply press *77 (dial 1177 on a rotary phone) to keep blocked calls from ringing through to your telephone. Instead of getting through, callers whose numbers are blocked will receive a message asking them to hang up, unblock their line by pressing *82 (dial 1182 on a rotary phone), and redial the number.

The result? No more "private" calls. For more information, call your local Bell Atlantic business office.

You may still see messages such as "unknown" or "unavailable" that appear on your display unit, but this happens when the technology is not available to provide the number of the party calling you.

Note: Some restrictions apply. Not available in all areas.

DISCOUNT SKIING FOR BELL ATLANTIC CUSTOMERS

\$5.00
FULL-DAY ADULT
OFF
ALL-AREA LIFT TICKET

Ski Windham, Windham, NY
1 800 SKI WINDHAM
Code: 125

Offer valid Sundays through Fridays, excluding holiday periods of Dec 25 - Jan 1, Jan 15 - 16, and Feb 19 - 21. One coupon per person. Offer may not be combined with other discounts or offers. Offer good through April 2000.

\$5.00
FULL-DAY ADULT
OFF
ALL-AREA LIFT TICKET

Waterville Valley Resort
Waterville Valley, NH
1 (603) 236-8311

Offer valid Sundays through Fridays, excluding holiday periods of Dec 24 - Jan 2, Jan 17, and Feb 19 - 21. One coupon per person. Offer may not be combined with other discounts or offers. Offer good through April 2000.

\$5.00
FULL-DAY ADULT
OFF
ALL-AREA LIFT TICKET

Okemo Mountain, Ludlow, VT
1 (802) 228-4041
Code: 66

Offer valid Sundays through Fridays, excluding holiday periods of Dec 25 - Jan 1, Jan 15 - 16, and Feb 19 - 21. One coupon per person. Offer may not be combined with other discounts or offers. Offer good through April 2000.

C O N S U M E R N E W S

Telephone Sales Calls: Know the Facts

Under the Federal Telephone Consumer Protection Act, anyone making telephone sales calls to residential customers must identify themselves, the individual or business they represent and the purpose of the call. This information must be provided even if an automatic dialer is used. If a customer specifically asks not to be called again, the telemarketer must place that customer on a "do-not-call" list, which the telemarketer is required to maintain under the Act. Telemarketers are prohibited from making unsolicited sales calls between the hours of 9 pm and 8 am.

From time to time, Bell Atlantic calls its customers to tell them about special promotions or new products and services. In conformance with federal law, Bell Atlantic maintains a "do-not-call" list for those customers who indicate that they do not wish to receive such calls. For more information about telephone sales calls, see the "Protection Tips" section of the *Customer Guide* in your Bell Atlantic White Pages Directory.

An Easy, Worry-Free Way to Pay Your Bill

When you sign up for the *Bell Atlantic® Direct Payment Option*, it means no late or lost payments, no check to write and no bill to mail. The Direct Payment Option is a convenient, free service that allows you to pay your Bell Atlantic bill automatically. Your monthly payments are transferred directly from your checking account to Bell Atlantic.

An enrollment form is printed on the back of your bill's payment stub. First, read the form carefully. Then, check the enrollment box, date and sign the authorization agreement and return it along with your telephone payment. Please be sure to pay the bill with a check from the same account number you want to use for the Direct Payment Option. We will notify your bank and make the arrangements for the automatic transfer each month.

Call Before You Dig . . . It's the Law

Whether you're laying a foundation for a building or planting a tree, you must first check for the existence of underground utility lines and cables. If you or your contractor disrupt any of these lines, the results can be dangerous — and costly — to everyone. Call before you dig, toll free, **1 800 272-4480** (in New York City and Long Island) or **1 800 962-7962** (in all other areas of the state).



The Heart of Communication.®

Bell Atlantic — NY
NYNEX
New York Telephone
Bell Atlantic Extra!
© 2000 Bell Atlantic
NY 1/00 (Res Up/Down)

“But I don’t need a condo in Florida, my daughter lives there!”

Telemarketing calls are important ways for companies to do business. However, you may not want to receive these calls for a variety of reasons.

Bell Atlantic wants you to know you have choices:

You have the legal right to have your name removed from specific calling lists. Ask the caller the name of the company he or she is representing. Tell them you do not want to receive telemarketing calls from that company, and ask them to put you on their “do-not-call” list.

You also have the right to reduce telemarketing calls from national companies by

writing to: Direct Marketing Association, Telephone Preference Service, PO Box 9014, Farmingdale, NY 11735-9014. Send a letter including your name, complete address, telephone number, including area code, or look in the Bell Atlantic *Extra* in your November bill for an easy-to-use form. Allow 90 days for your request to become effective.



Reducing Unwanted Telemarketing Calls

Are you receiving unwanted calls involving product sales or charitable solicitations? While it is impossible to stop all unwanted calls, there are steps that you can take to reduce them.

In the *Customer Safety and Protection Tips* section of the introductory pages of your Bell Atlantic directory you can find a list of suggestions for handling this type of call. By following the steps outlined there, you can eliminate some of the unwanted calls.

To further reduce calls from many companies, please complete the following form, place it in an envelope and mail it to:

Direct Marketing Association
Telephone Preference Service
PO Box 9014
Farmingdale, NY 11735-9014



Please allow 90 days for your request to become effective.

(Please Print)

Name: _____

Address: _____

City, State, ZIP: _____

Telephone Number: (_____) _____ - _____

Signature: _____

To: Direct Marketing Association
Telephone Preference Service

I want to reduce the number of solicitation and sales calls that I receive. Please place my name and telephone number on any and all "Do Not Call" lists maintained by your organization and/or its member companies. Thank you.



Visit us at www.BellAtlantic.com

Bell Atlantic—NE
NYNEX
New England Telephone
Bell Atlantic Extra!
Floor 2, 800 Hinesburg Rd.
South Burlington, VT 05403
© 1998 Bell Atlantic—NE
VT 11/98 (Res)



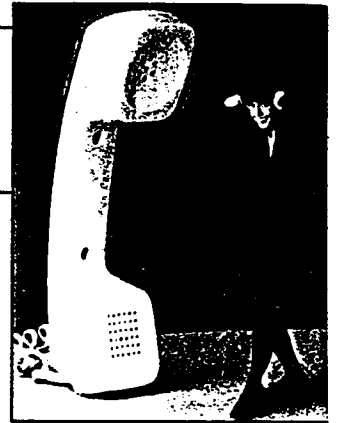
How to reduce unwanted telemarketing at home...

Many people find that telemarketing calls provide them with valuable information about products and services. But *if you would rather not receive these calls*, here are two things you can do:

- 1.** *When you receive a call*, ask to be placed on the company's "do not call" list, which is required by Federal law.*
- 2.** *To end calls from most reputable telemarketers*, use the coupon on the back to register with the national Telephone Preference Service.

If you continue to receive calls 90 days after registering with the Telephone Preference Service or asking a company to stop calling, please write to the VT Attorney General's Consumer Assistance Program, Morrill Hall, University of Vermont, Burlington, VT 05405, phone 1-800-649-2424. Please provide your name, address and phone, and the name and date of the unwanted call.

**Nonprofit organizations, political groups, polls and calls from companies you already do business with are exempt.*





What's Inside Vermont

Introducing Our Product Information and Instruction Line 1

View Your Bill Online at www.BellAtlantic.com 2

Not in Time? Press *69 2

Know Who's Calling with Caller ID 3

Consumer News 4
• Reduce Unwanted Telemarketing Calls

When you have a question about any Bell Atlantic product or service, just dial 1 800 523-0559.



Bell Atlantic Product and Service Information Is Now Available Anytime You Need It.

What exactly is *Three-Way Calling*? How does one temporarily turn off *Call Waiting*? How does *Call Forwarding* work? And why on earth do these types of questions always pop into your head during odd hours?



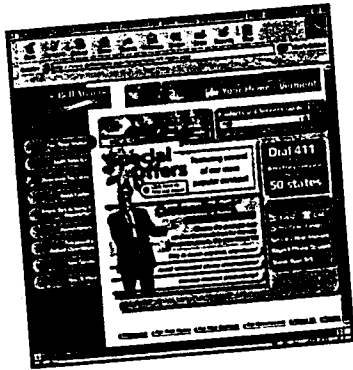
Fortunately, the answers to these and any other questions you may have about Bell Atlantic products and services are just a FREE phone call away, anytime of the day or night.



Introducing Our Product Information and Instruction Line.

When you have a question about any Bell Atlantic product or service, just dial 1 800 523-0559 when it's convenient for you. Our new *Product Information and Instruction Line* is at your service twenty-four hours a day, seven days a week. It's easy to use — simple voice prompts quickly lead you to the answers you need — and it's absolutely free.

Being in the Know Just Got Easier!



Register at the Bell Atlantic Website and View Your Bill Online

Now you can view your bill online when you register at our website. Just visit us at www.BellAtlantic.com/foryourhome to sign on. Once you've registered and are in the system you can see your current charges, or, if you'd prefer, previous months' bills.

Registering at our website has other rewards as well. You can order many of our products and services online — when it's convenient for you. Because www.BellAtlantic.com/foryourhome is open 24 hours a day, 365 days a year. To register, all you need to give us is your telephone number and the three digit customer code (located after your telephone number on the first page of your phone bill).

If you choose not to register with us, you can still use our site to get information about our products and services, communicate with us via e-mail, or even report phone trouble.

Did You Miss Your Last Call? With *69, It Won't Happen Again.

Does this sound familiar? You're just stepping into the bath or shower and the phone rings. While you're deciding whether or not to answer it, the caller hangs up and you're left wondering who it was. With *69 from Bell Atlantic, you won't have to worry about missing that call again. Just press *69 (dial 1169 from a rotary phone) to get the number, date and time of the last call.

With *69, You Choose How to Respond.

You can then press "1" to return the call, if it's in your local calling area. Or, jot down the number and call back later. Or, do nothing. So why wonder who called last? Just remember to press *69.

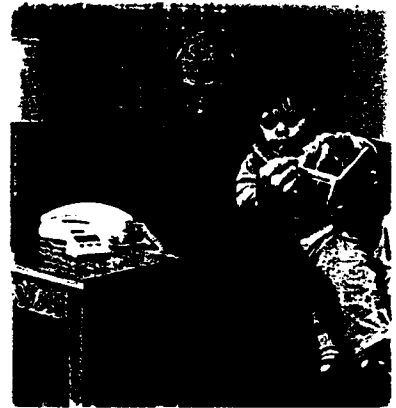
Note: Pressing *69 costs 50 cents per use plus the cost of the call when the calling number is given. Not all calls are identified. Availability and other restrictions may apply.



If Only More Things in Life Were Like This

If we could only know more things ahead of time. Like whether or not that recently purchased stock will increase in value. Or, if the day you have planned for that outdoor event will actually be sunny. Fortunately, with *Bell Atlantic® Caller ID*, you will know who's calling before you pick up your telephone.*

With Caller ID you'll see the name and number of who's calling. So you can decide if you want to answer the call, or call back later. You'll also see the date and the time of your calls. This comes in handy because your Caller ID box will hold this information in its memory. So if you're too busy to get to the phone, or you're away from home and someone doesn't leave a message, you'll still know who called.



With Call Waiting ID and Call Waiting You'll Know Who's Calling While You're *On* the Phone

If you'd like to know who's calling while you're on your line, we have *Call Waiting ID*.* Call Waiting ID works in conjunction with Call Waiting, so you'll hear a special tone alerting you to a second incoming call. You can then see who's calling, and either answer by putting the first caller on hold, or note the caller's number and call back later.

For more information on Caller ID or Call Waiting ID and Call Waiting, call your local Bell Atlantic business office or visit us at www.BellAtlantic.com/foryourhome.

*Separate equipment required, purchased separately. Not all calls identified. Availability and other restrictions may apply.



C O N S U M E R N E W S

How to Reduce Unwanted Telemarketing Calls at Home...

Many people find that telemarketing calls provide them with valuable information about products and services. But *if you would rather not receive these calls*, here are two things you can do:

1. *When you receive a call*, ask to be placed on the company's "do not call" list, which is required to be retained by Federal law.*
2. *To end calls from most reputable telemarketers*, use the coupon below to register with the national Telephone Preference Service.

If you continue to receive calls 90 days after registering with the Telephone Preference Service or asking a company to stop calling, please write to the VT Attorney General's Consumer Assistance Program, Morrill Hall, University of Vermont, Burlington, VT 05405; phone 1 800 649-2424. Please provide your name, address and phone, and the name and date of the unwanted call.

*Nonprofit organizations, political groups, polls and calls from companies you already do business with are exempt.

Please register my name with the Telephone Preference Service!

Send to: The Telephone Preference Service, P.O. Box 9014, Farmingdale, NY 11735-9014

Name _____

Street _____

City _____ State _____ Zip _____

Phone Number _____ Signature _____

A joint project of Vermont's telephone companies, business organizations, and the State of Vermont.



Visit us at www.BellAtlantic.com

Bell Atlantic—NE
NYNEX
New England Telephone
Bell Atlantic Extra!
Floor 2, 800 Hinesburg Rd.
South Burlington, VT 05403
© 2000 Bell Atlantic
VT 4100 (Res)

What You Should Know About Automatic Dialing Services.

This is an important notice. Please have it translated.

Este é um aviso importante. Queira mandá-lo traduzir.

Este es un aviso importante. Sirvase mandarlo traducir.

ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY

Ceci est important. Veuillez faire traduire.

本通知很重要。请将之译成中文。

នេះគឺជាជំពាក់សំខាន់ណាស់ សូមមេត្តាបកប្រែជូនផង

Under Massachusetts Law, you can elect *not* to receive telephone calls from automatic dialing services used *within* the Commonwealth of Massachusetts.

Bell Atlantic is required to compile a list of telephone numbers for customers not wishing to receive these calls and to make this list available to the operators of automatic dialing systems. In order to be included on this list, please notify Bell Atlantic by completing and mailing the form on the back of this card. Or, if at any time you wish to change your option, simply contact your Bell Atlantic service center.

Automatic dialing systems are prohibited from selecting or dialing the telephone numbers of customers who do not wish to be called. **If you have previously either mailed in this card or called your local Bell Atlantic service center to place your number on the list, please do not return this card.**

(over, please)

The law defines an automatic dialing system as "any automatic terminal equipment which is capable of storing numbers to be called or producing numbers to be called, using a random or sequential number generator, and with the ability to call such numbers, and which is capable of delivering a prerecorded message to the number called with or without manual assistance."

Note to Operators of Automatic Dialing Systems:

You can obtain a current listing of telephone numbers for customers who do not wish to be called, and must eliminate their numbers from your programs.

To obtain the list, please send a written request to your Bell Atlantic business office.

Please include my number(s) on the list of those to be excluded from calls placed by automatic dialing systems from within Massachusetts.

(Note: Those on this list may *still* receive automatically dialed calls originating *outside* Massachusetts.)

Name _____

Address _____

City _____ Zip Code _____

Telephone(s) (_____) _____
Area Code

(_____) _____
Area Code

Place this card in an envelope and mail to:

Bell Atlantic - ASC
350 Granite Street
Floor 3 Rear
Braintree, MA 02184-3905



MA 11-98

Other Important Information

Harassing/Abusive Calls

It is a crime under both state and federal laws for anyone to make obscene or harassing telephone calls. These laws have penalties of imprisonment and/or a fine.

If you ever receive obscene, abusive, harassing or threatening calls, follow these suggestions:

- Hang up at the first obscene word. Hang up if the caller remains silent the second time you say hello. Remember, you control your telephone, not the person calling. Wait at least 20 seconds before placing a call. This allows Bell Atlantic's equipment to disconnect the caller even if the caller does not hang up.
- Do not give any information, such as your name and address, until the caller has been properly identified.
- Advise your children and guests not to give out any information. If you are not at home, those answering your telephone should be instructed to say, "They're busy right now, may I take a message?"
- If calls persist, call our Business Office whose number appears on the Current Charges page of your bill and on page 3 of this Customer Guide. Also, see information on optional services Call Block, Call Trace and Caller ID on pages 39, 40, 42 and 43 in this Customer Guide.

If you dial and reach a wrong number, don't just hang up. Hang up calls can be upsetting, unnerving or even considered harassing. Please tell the person who answers that you misdialed.

Solicitation Telephone Calls

Many businesses, including Bell Atlantic, sell their products and services through telephone solicitation. If you receive a sales call and think you are interested, ask the caller to mail information to you. If you are not interested, stop the caller and say so. If you receive a call at home and do not want any more calls from that company or organization, ask the caller to take your name off their list. If a machine has dialed you, just hang up. Please wait approximately 20 seconds after hanging up for the equipment to disconnect. If you pick up the phone before that time has elapsed, the timing begins again. You can remove your name from some national telephone solicitation lists by writing to:

Telephone Preference Service
Direct Marketing Association
P.O. Box 9014
Farmingdale, NY 11735-9014

In your letter, include your name, address, zip code and phone number, including area code.

Telephone Safety

The telephone is one of the safest appliances in your home or office, but there are a few situations where a telephone user should be cautious.

- Do not use the telephone while you are in the bathtub, shower, or swimming pool. Putting the telephone in water could cause a shock.
- Avoid using the telephone during electrical storms in your immediate area. Urgent calls should be brief. Bell Atlantic uses protective measures to limit electrical surges from entering your home, but absolute protection from lightning is impossible.
- If you suspect a gas leak, report it immediately, but use a telephone away from the area in question. The telephone's electrical contacts could create a tiny spark when you dial. While unlikely, it is possible that this spark could ignite heavy concentrations of gas.

Recording of telephone conversations

When you hear a "beep" tone, your conversation is being recorded. If you do not want it recorded, ask to have the recording machine turned off. Recording without the consent of both parties or without a beep tone may cause phone service of the party doing the recording to be disconnected. Emergency lines, such as police and fire, do not have to use a beep tone.

900 Number Use and Restriction

Some information services are provided through 900 numbers. Bell Atlantic does not provide these services but in some instances may do the billing for the companies that provide the service. Be aware that when you call a 900 number, you pay for the call. In most areas we can restrict all calls to these numbers from your phone line; this is referred to as Blocking. Call your local Bell Atlantic Business Office to have your lines restricted so that 900 numbers cannot be called. There is no charge for this option; however, if you elect 900 Blocking and later request that it be removed, there is a charge of \$25.00 per residence line to have the Blocking option reinstalled. Requests to remove 900 blocking must be in writing.

700 Number Use

Some long distance companies offer "700" numbers for their customers to call for such services as reporting repair needs or problems or chat lines. Access to "700" numbers cannot be blocked.

Yielding a party line in an emergency

State law makes it a crime to refuse to yield a party line immediately when told the line is needed for an emergency. It is also unlawful to take over a party line by stating falsely that the line is needed for an emergency. The penalty for either offense shall be a fine or imprisonment, or both.

Audiotex Service — 976 & 556

Audiotex Service is a service under which Independent Sponsors, who are not affiliated with Bell Atlantic, provide prerecorded or live programs. The Independent Sponsor has exclusive responsibility for, and control over, the content of the recording or live program as well as the price. Bell Atlantic assumes no liability for the quality or defects in or content of the program. There are two Audiotex exchanges—976 and 556

976

"976" Service is available in some areas and offers recorded programs such as sports, lottery information, etc. This service may be blocked. Our Business Office can arrange this blocking for you at no charge.

556

"556" Service provides live programs such as talk lines as well as live and recorded programs of an adult and sexually explicit nature. All calls to the 556 exchange are automatically blocked. If you want to be able to call 556 numbers, you must first call our Business Office and ask for an authorization form to be mailed to you. Only customers providing us with a completed authorization form will be able to reach 556 numbers. There is no charge to arrange for access to 556 numbers. Third party billed calls and collect calls to 556 numbers are not permitted.

Bell Atlantic Privacy Principles

Disclosure of information outside Bell Atlantic

Ordinarily, Bell Atlantic will notify you and give you the opportunity to "opt out" when we disclose telephone customer information outside of Bell Atlantic. However, we do release customer information without involving you if disclosure is required by law or to protect the safety of customers, employees or property.

In some states, we compile lists of names, addresses and telephone numbers from our White Pages directories and provide the lists to qualified companies that are conducting product promotions. Non-published and non-listed numbers are not included in these lists. However, if you do not have a non-published or non-listed number, you can choose to remove your name from these lists.

All customers in areas where Caller ID services are available have the ability to block the display of their phone numbers and names.

Customers can also choose to be excluded from our reverse directory service, Call54, in areas where the service is available. This service allows customers to obtain the name and address associated with a telephone number (other than non-published numbers).

Examples where disclosure is required by law or to protect the safety of customers, employees or property

When you dial 911, information about your location may be transmitted automatically to a public safety agency.

Also, certain information about your long-distance calls is transmitted to your long-distance company for billing purposes. Plus, Bell Atlantic

is required by law to give competitive local exchange carriers access to its customer databases for purposes of serving their customers, to exchange credit information with other carriers, and to provide listings (other than certain non-published and non-listed information) to directory publishers.

Bell Atlantic must disclose information, as necessary, to comply with court orders or subpoenas. Bell Atlantic also will share information to protect its rights or property and to protect users of its services and other carriers from fraudulent, abusive or unlawful use of services.

Your Telephone Account Information Rights (the FCC refers to this information as *Customer Proprietary Network Information or CPNI*)

We understand that privacy is very important to all our customers. So, unless we have your permission, Bell Atlantic does not share information about your account with our affiliates and agents, such as Bell Atlantic Mobile and Bell Atlantic Internet.

However, our affiliates and agents do provide a number of quality products, services, and special offers that may be of great interest to you. We would like your permission to review your account information to tell you about all our products and services. When we ask your permission, we hope you'll give us the opportunity to help you make the most informed choices for your telephone needs. Naturally, whether or not you decide to give us your permission will in no way affect the high quality of service you've come to expect from us. And your permission will remain valid until you tell us otherwise.

Other Important Information

Bell Atlantic Employees

All Bell Atlantic employees carry a photo I.D. card. Please ask to see the I.D. before you let a Bell Atlantic employee into your home or office.

Before You Dig Or Drill

Whether you're laying a foundation for a building or planting a tree, you must first check for the existence of underground utility lines and cables. If you or your contractor hit any of these lines, the results can be costly to you - and dangerous to everyone.

Pa. One Call System, Inc.:

Underground Line Locating Service

1-800-242-1776 (toll free)

Cordless Telephones

These telephones operate on radio waves and the following situations may be encountered with some cordless telephones:

- Interference from CB and Ham radio transmissions.
- Loss of privacy - the possibility of calls being overheard.
- Unauthorized use of your telephone service to make calls.

For example, neighbors' cordless phones may be on the same frequency as your cordless phones. This may let calls you do not know about be charged to your bill or may cause interference on your line. Bell Atlantic has no control over these phones or the radio channels on which they operate. If one of these situations develops and you are using a cordless phone, you may want to stop using that phone. You are responsible for the equipment you use on your line and calls that are dialed from your phone line.

Customer Lists

Most of our customers' names, addresses and telephone numbers are listed in our directories.

Bell Atlantic sometimes uses these lists (which also include non-published telephone numbers) to inform our customers about new products, services and discounts. However, customers who do not wish to receive such calls can "opt out," or have their names removed from telemarketing lists that we use. If you receive an unwanted telemarketing call from us simply tell a Bell Atlantic representative that you don't wish to receive future calls.

From time to time, Bell Atlantic also licenses to other marketers the names, addresses and phone numbers of customers who are listed in the Bell Atlantic phone books. If you do not want your name included on the lists Bell Atlantic uses or licenses to other marketers, call our Business Office. We will not include your name and address on those lists, but you still may be on mail and phone lists sold by other companies.

Fraudulent callers are subject to prosecution

It is illegal for a person to charge calls to another person's number or Calling Card without his or her permission. Individuals placing such calls to avoid payment for service are subject to prosecution and if convicted are subject to imprisonment and/or a fine.

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Phone Fraud

How to OUTFOX PHONE FRAUD when using your Calling Card

- Make sure no one sees you key-in your calling card number or overhears you stating it to an operator. Block the view of the telephone keypad and speak directly into the phone. When possible, use a phone that reads your card automatically.
- Do not use your calling card as an identification card. Use your drivers license or use some other form of ID when dealing with merchants, telemarketers and other "Salespeople".
- Report a lost or stolen card immediately. The moment you suspect your calling card has been lost, stolen, or otherwise compromised, report it immediately to your card provider.
- Memorize your calling card and PIN number. Select or change your Personal Identification Number (PIN) to an easily remembered number. Request that your PIN number not be printed on your calling card.

How to OUTFOX PHONE FRAUD on your Cellular Phone

- Remove handset and antenna from car when not in use. This will help avoid the unwanted attention of criminals with Electronic Serial Number (ESN) cloning devices.
- Protect your Electronic Serial Number. Never give your ESN number to anyone. And don't put your subscriber agreement in an unsafe place, such as the glove compartment.
- Never let anyone use your phone unless you are present. If someone wants to use your phone, offer to dial the number for them. Fraud criminals can easily access the codes stored in your phone.
- Have service performed only at reputable locations. If you need service, take your phone only to an authorized distributor of your cellular service.
- If your phone is stolen, call your local police and cellular carrier immediately. The sooner you do, the less likely your phone will be used fraudulently.

How to OUTFOX PHONE FRAUD when at Home

- Telephone companies or law enforcement officials will never ask customers to accept collect or third party charges as part of an investigation. The only time a telephone company representative will request specific billing information is if you make a call through an operator.
- Beware of individuals who call you requesting calling card verification. Telephone companies will never call you to ask for your calling card number. Only when you make a call through an operator should you give out your card number.
- Don't accept third party calls that are suspicious or from someone you do not know. Third party and collect calls can be blocked from your home or business. Contact your local business office.

Alliance to OUTFOX PHONE FRAUD

- The Alliance to Outfox Phone Fraud is a broadbased group of telecommunications companies and related industries whose goal is to create consumer awareness about telephone fraud. The animated character Freddie the Phone Fraud Fox serves as the official mascot and spokesperson for the public awareness campaign.
- For more information on the alliance, call:

1 800-9-OUTFOX (1-800-968-8369)

or visit the website at: <http://www.gnat.net/outfox>.



Bell Atlantic Privacy Principles

Your Privacy is our priority

Bell Atlantic has strict policies governing employee access to customer records. We access customer accounts, records or reports for authorized business purposes only. We educate our employees about their obligation to safeguard customer information and telephone calls, and we hold them accountable for their actions.

Privacy is a priority for Bell Atlantic when we develop new products and services. Bell Atlantic conducts a privacy review, which includes consumer input, as part of its product development process. And we inform customers about any privacy implications of new products and services we introduce.

The information we obtain, and how we use it

Bell Atlantic only obtains information about customers that helps us to provide service, and we use that information for business purposes only.

We want to make sure the information we obtain and use is accurate. Much of this information is reflected in your monthly telephone bill. If you see an inaccuracy on your Bell Atlantic bill, you should contact us so that we can correct it.

Bell Atlantic provides useful information about new products and services to our residential customers. If you do not wish to receive such information you can have your name removed from the direct mail, telemarketing and customer survey lists that we use. Should you receive an unwanted telemarketing call from us, simply tell our representative that you don't wish to receive future calls. Please understand that making this type of request may mean that you will be unaware of useful services or discounts.

When you speak with us at Bell Atlantic, a supervisor may listen in on that call. Supervisors listen in only to help train employees and ensure that we provide you with accurate information and high-quality customer service.

(continued on next page)

Bell Atlantic Customer Guide

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Emergency Numbers

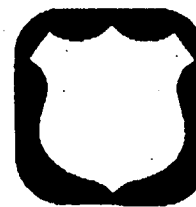
City of Philadelphia



Ambulance



Fire



Police

9-1-1

Or dial "0" (Operator) - Voice Only

Stay on the line. Give the Operator the street address and community where help is needed.



Text Telephone (TTY/TDD) Users:

Ambulance • Fire • Police

9-1-1

When calling from a TTY/TDD, after your call is answered, pressing a TTY/TDD key several times may help shorten the time necessary to respond to your call.

TTY/TDD Users - See page 10 for more information.

Other Important Numbers

Bureau of Alcohol, Tobacco & Firearms (ATF)	215-597-7266	U.S. Secret Service	215-597-0600
FBI	(voice only) 215-418-4000	Water and Sewer	
.....	(TTY/TDD only) 215-418-4699	Service and all complaints except billing	
Gas Leaks and Emergencies	215-235-1212	day or night	215-685-6300
Poison Control	215-386-2100	Billing Complaints	215-686-6880
Suicide Prevention Center	215-686-4420	Philadelphia City Government Information	215-686-1776
U.S. Coast Guard - Search and Rescue	215-271-4940	Toxic Chemical and Oil Spills	(Voice/TTY/TDD) 1-800-424-8832
U.S. Customs Service Enforcement	215-597-4305		
U.S. Marshal	215-597-7272		

Crisis Intervention and Non-Emergency Numbers

Consult the Blue Bordered Pages of this directory for the numbers of Crisis Intervention Services (Hot Lines, etc.) in the Guide to Human Services. Others may be listed in the Yellow Pages under Crisis Intervention or Human Services Organizations. For a complete listing of Police, Fire, Ambulance and EMA Non-Emergency phone numbers consult the Blue Bordered pages of this directory.