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To illustrate the first guideline, let's consider a hotel lobby. We know there are many "people in motion" in a hotel lobby.

A hotel lobby, then, could be a good general site for a public telephone. The phone would get a lot of usage and produce good revenues.

To illustrate the second guideline, let's consider a hotel conference room. On any given day, you would find far fewer people at a conference room than in and around a hotel lobby. We also know that many people in meetings are business people and professional people, and that these people are heavy users of public telephones. So, even though there are fewer people here, the average users in the conference room make more calls than the average user in a hotel lobby.

So, a public telephone situated near the conference room, for instance, may also meet your criteria for site selection: It will maximize usage and revenues.

Some Good General Sites for Public Telephones

Some good general indoor sites for public telephones include those

- near entrances
- near exits
- near cash registers
- in customer and employee lounges
- near restrooms
- near low-cost sales items so callers can make a purchase to obtain change.

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Some good general outdoor sites for public telephones include those

- near entrances
- near parking areas
- near public transportation facilities, such as bus stops, cab stands, train stops
- around shopping malls
- outside convenience stores
- on city sidewalks
- truck stops
- on highways, at regular intervals, especially rest areas
- near shopping, information or public service areas
- in public parks, at campgrounds, at beaches
- at service stations.

These are all sites where people congregate or traffic flows.

**Choosing Specific Locations for Public Communications Stations**

So far you have learned about good general sites for public telephones and the guidelines for choosing them.

But, when a phone is installed, it is installed at a specific location. For instance - on the north wall, three feet from the east wall, with the coin slot at a height of 54 inches.

As a Public Communications salesperson, you select general sites for public telephones. You then designate the specific location within that site where you want the phone installed.

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Test of Station Visibility

Stand in or walk through main traffic pattern!

- Is the station visible?
- Does it catch your eye?

If your answer is "yes," then the requirements for visibility have been met.

If not -

- Is there a visible directional sign pointing to the station?
- Does the sign catch your eye?

Accessibility

ACCESSIBILITY = EASY TO USE, UNOBSTRUCTED, WITHIN REACH; AVAILABLE

You choose accessible locations

1. So users can easily approach and use the station
2. So users can make calls without obtaining permission.

The concept of accessibility also includes

- adequate space to sit or stand while calling
- instrument mounted at proper height for pedestrian or wheelchair access

Choosing accessible locations is important, because if a person cannot reach or get to the station, then he/she cannot use it.

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It is possible for a station to be highly visible, yet not accessible to the public. For example, a public telephone located on the wall, behind a bar, would be visible - yet not accessible to the general public. Even though the handset cord is long enough to reach the user, the user would still have to ask permission to make the call, and have the bartender deposit his/her money and dial the number.

Test of Accessibility

- Can you approach the station and use it easily?
- Can you use it without asking for help or permission?

If your answer is "yes," then the requirements for accessibility have been met.

Convenience and Safety

CONVENIENT AND SAFE INCLUDES: PROPER LIGHTING, PRIVACY, CHANGE-MAKING FACILITIES, MINIMAL NOISE, SHELTER.

You choose convenient and safe locations

1. To make the user feel comfortable when making calls
2. So the user is not endangered when making calls.

Proper lighting at or around a station is important to both safety and convenience. It facilitates reading the directory and dialing.

Privacy can be a great convenience at certain locations, depending on the amount of traffic and the types of calls generally made.

Change-making facilities nearby can also be an appreciated and profitable convenience.

Noise that might inconvenience the user should be considered at each location. We try to minimize noise level as much as is practical without compromising visibility or accessibility.

Shelter offered by the station must also be considered, particularly for outside locations.

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Test of Convenience and Safety

You consider location from a standpoint of crowds, safety, lighting, privacy change-making, noise and need for shelter.

- Would you want to use this station?
- Is it inviting, pleasant, and safe to use?

If your answer is "yes," then the requirements of safety and convenience have been met.

5-8

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**I N T E R O F F I C E   M E M O R A N D U M**

**Date:** 07-Oct-1992 09:20am  
**From:** GARY DAAKE  
DAAKE.GARY AT A1 AT OMNI  
**Dept:** MKTG & SALES - Public Com  
**Tel No:** 314-235-9497

**Addressees:** 56

**Subject:** New Section

Hi,

Attached you will find the latest addition to the Public Communications Sales Operating Practices. This section outlines the things to be considered when placing a pay telephone. Please place this section behind TAB 13 of your binder and cover with your PTC's as soon as possible.

Any questions, please call me at (314) 235-9497.

Thanks,

GD

**Distribution:**

Use the SH option to view the distribution list.

**SOUTHWESTERN BELL TELEPHONE PUBLIC COMMUNICATIONS**

**Sales Operating Practices**

**Pay Telephone Placement**

**Introduction**

In the course of day to day operations, the Public Communications sales person is asked to provide pay telephone service in a number of different environments. In order to be profitable, certain criteria must be met regarding location, visibility, and traffic. The degree to which each of these criteria are met, as well as other determining factors, will indicate the type of station to be installed: Public, Semi-Public, or Policy.

**Objective**

This practice has two objectives. The first is to provide a set of guidelines to be used in determining if and what type station to install for a given customer. Second, and just as important, to provide continuity of application between the districts.

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**Sales Operating Practices**

**Pay Telephone Placement**

If none of the previous circumstances apply, and improvements to the station do not increase revenue, the station should be considered for removal. This decision should, however, be tempered by the following considerations.

1. How long has the station been in place? If a station has been in place for several years, quite possibly the capital costs have already been recovered. Therefore, the station need only cover the cost of operating and maintaining it. The amount of revenue required to make a contribution to profit is much lower.
2. Is there a public need associated with the telephone which would make it unwise to remove it? Safety or emergency needs at the location may dictate that the telephone should be retained.
3. The telephone may be located at a place where the public has only occasional access or the activity is seasonal. For example a fairground or a baseball or football stadium.

Any station that is generating less than \$15.00 per month (\$.50/day) should be reviewed for improvement, removal or conversion to a semi-public station. A practice should be made to evaluate all stations from the bottom of the revenue scale upward on a regular basis.

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**Sales Operating Practices**

**Pay Telephone Placement**

As society becomes more mobile, the need for people to make telephone calls while away from home continues to increase. The current popularity of cellular telephones has impacted our business, however, there remains a viable market for pay telephones. With pay telephones, members of the public may originate local, intraLATA and interLATA telephone calls on a sent paid (coin), or non-sent paid (collect, third party, calling card) basis. In order to take full advantage of our market, public telephones need to be visible and provide convenient access for the end user.

**Public Stations**

Pay telephones are placed, at the Company's option, to satisfy the end user's telecommunications needs while away from home or office. To qualify for a public telephone, certain revenue performance levels are expected. Generally, a pay telephone is expected to generate \$3.00 - \$3.50 per day. To protect the Company's investment, no station should be installed without first obtaining a signed contract from the site owner (for a description of the various contracts see Tab 4 - Contracts). In determining if a location holds sufficient promise, the following factors should be considered.

**Type of business or activity conducted at the location.** Experience has shown that certain types of businesses or activities are more profitable than others. For example, a pay telephone at a service station or convenience store will, generally perform well.

**Other business telephones at the location.** Access to these phones by the public would adversely affect pay telephone revenues. For example, hospitals are normally good revenue producers. If the hospital, however, allows visitors to use their own telephones and use the hospital's network to place free telephone calls, pay telephones will be negatively affected.

**The existence of other pay telephones usually means that the pay telephone needs of the public are being met at that location, however, if the current station is generating high revenue, another station at this location could capture revenue that is walking away because the existing station is in use.**

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**SOUTHWESTERN BELL TELEPHONE PUBLIC COMMUNICATIONS**

**Sales Operating Practices**

**Pay Telephone Placement**

**Hours of operation.** This is particularly important for indoor stations. The hours of operation of the business in question will determine the hours of access to the telephone. If a business maintains short or unusual hours of operation, an indoor station may not be advisable. In this situation, the sales person may elect to provide an outdoor station.

**Accessible location for the pay telephone.** The pay telephone should always be placed where it is visible and accessible to the end user to maximize revenue performance.

**Number of requests for a pay telephone per day.** This will give an indication of the usage and the resultant revenue performance. The higher the number of requests for a pay telephone per day, the higher the potential revenue for that station.

**Number of customers per day.** This would give an indication of the potential users of a pay telephone. Again, the higher the number, the higher the potential. Any of these customers could, at any given time, need the use of a telephone.

Once the preceding factors have been assessed, the sales person must use their experience and judgment to determine if a location will support a pay telephone. The sales person will have to estimate whether a station will achieve the minimum revenue required for it to be profitable. Currently, a station should average potential of between \$3.00 and \$3.50 per day to qualify.

**Semi-Public Stations**

If a location does not meet the minimum criteria for a public telephone, the alternative may be to install a semi-public station. With a semi-public station, the customer pays for the installation as well as a monthly service charge, while the Company retains any money collected (sent paid) or billed (non-sent paid) from the station. Since the customer is paying for the service, they are provided a directory listing and can have an extension to the telephone to receive incoming calls. Semi-public service is arranged through the Public Service Center.

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**SOUTHWESTERN BELL TELEPHONE PUBLIC COMMUNICATIONS****Sales Operating Practices****Pay Telephone Placement****Policy Stations**

The official definition of policy stations is as follows.

"Coin telephones placed from time to time (but only on rare occasions) for public need without regard to profitability. Public need is constituted by a need for communication to assure safety, welfare and health of the public at any location where no other telephone service is readily available."

Generally, requests for this type of station will come from a local Company manager or interested member of the community who is familiar with the local conditions. Where such a need exists, it may be sound business practice to place the station. Some examples of policy stations are public parks, small airports, or a Boy or Girl Scout camp. All requests for a policy station should be reviewed by the Area Manager - Sales before being granted.

**Low-Pays**

It is generally accepted that a station will not reach its full potential until it has been "socialized" at the location. A substantiation report is generated on each new station 3 months, 6 months and 1 year after installation. If a station is not generating sufficient revenue, it should be reviewed for improvement. Items to be considered are:

1. Has there been theft, fraud or some other criminal activity which has caused the coin box revenue to be lower than predicted?
2. Has there been a change in customer traffic patterns which has caused revenue to be lower than expected? For example, did a restaurant stop serving during the dinner hour?
3. Has the customer rearranged other facilities on his premises which now interferes with access to the telephone? For example, moving a vending machine in front of the phone.
4. Are there positive steps, such as signs or lighting, which can improve its potential?

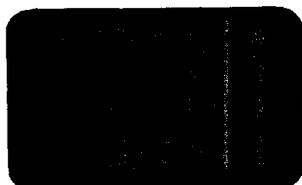
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**The Identity of the Person or Persons who Provided the  
Information in Response to Each Interrogatory**

Interrogatory No. 1	William A. Brown , Senior Counsel
Interrogatory No. 2	Shanna Bradley, Manager
Interrogatory No. 3	June Burgess, Associate Director
Interrogatory No. 4	Dana Smith, Area Manager & Pati Grosman, Manager
Interrogatory No. 5	Dana Smith, Area Manager
Interrogatory No. 6	Dana Smith, Area Manager
Interrogatory No. 7	Dana Smith, Area Manager
Interrogatory No. 8	Dana Smith, Area Manager
Interrogatory No. 9	Dana Smith, Area Manager
Interrogatory No. 10	June Burgess, Associate Director
Interrogatory No. 14	June Burgess, Associate Director
Interrogatory No. 15	June Burgess, Associate Director
Interrogatory No. 16	Rodger McDowall, General Manager
Interrogatory No. 17	Rodger McDowall, General Manager
Interrogatory No. 18	Jan Rogers, Director
Interrogatory No. 19	Rebecca Harlen, Business Analyst
Interrogatory No. 20	Rodger McDowall, General Manager & Candace Carney-Savard, Product Manager
Interrogatory No. 21	Candace Carney-Savard, Product Manager
Interrogatory No. 22	Carey Caldwell, Product Manger
Interrogatory No. 23	Rebecca Harlen, Business Analyst
Interrogatory No. 24	Rodger McDowall, General Manager
Interrogatory No. 25	Carey Caldwell, Product Manger & Rodger McDowall, General Manager
Interrogatory No. 26	Carey Caldwell, Product Manger
Interrogatory No. 27	Rebecca Harlen, Business Analyst
Interrogatory No. 28	Debbie Dotson, Associate Director
Interrogatory No. 29	June Burgess, Associate Director
Interrogatory No. 30	ALL
Interrogatory No. 31	William A. Brown , Senior Counsel & June Burgess, Associate Director
Interrogatory No. 32	William A. Brown , Senior Counsel



VERIFICATION

My name is Rodger McDOWALL and I am employed by Ameritech Services / INC. My title is GENERAL MANAGER - INFORMATION Systems. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 20, 24, 25, 17, 16.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.

Rodger McDowall

SIGNATURE®

(PRINT NAME BELOW SIGNATURE)

Rodger McDowall

**VERIFICATION**

My name is JUNE A BURGESS and I am employed by Southwestern Bell. My title is Associate Director. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 3, 10, 14, 15, 29, 30, & 31

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.

June A. Burgess

SIGNATURE

(PRINT NAME BELOW SIGNATURE)

JUNE A BURGESS

VERIFICATION

My name is Becky Harlen and I am employed by SBC. My title is Business Analyst-Customer Svc. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 19a, 19b, 23, 27.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.

Becky Harlen

SIGNATURE<sup>o</sup>  
(PRINT NAME BELOW SIGNATURE<sub>E</sub>)

Becky Harlen

**VERIFICATION**

My name is William A. Brown and I am employed by SBC Management Services, Inc. My title is Senior Counsel – External Affairs/FCC. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to “Complainant’s First Set of Interrogatories to Defendant,” served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 1, 31, and 32.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.

  
SIGNATURE ↕  
(PRINT NAME BELOW SIGNATURE ↕)

William A. Brown

**VERIFICATION**

My name is Candace Carney-Savard and I am employed by SBC Communications, Incorporated. My title is Product Manager. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 20 and 21.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.



SIGNATURE )

(PRINT NAME BELOW SIGNATURE)

Candace Carney-Savard

VERIFICATION

My name is Shanna Bradley and I am employed by ~~Southwestern Bell Telephone~~ My title is Manager Rates. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 2.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.

S R

SIGNATURE  
(PRINT NAME BELOW SIGNATURE)

Shanna Bradley

**VERIFICATION**

My name is CAREY CALDWELL and I am employed by Southwestern Bell Telephone Company. My title is Product Manager - Payphone Services. As part of my job, I have been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 22, 25, 26.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.

Caldwell

SIGNATURE:  
(PRINT NAME BELOW SIGNATURE)

CAREY A. CALDWELL

**VERIFICATION**

My name is Deborah L. Dotson and I am employed by SBC Management Services, Inc.. My title is Assoc Dir-Corp. Records & Information Management. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. #28.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.



SIGNATURE  
(PRINT NAME BELOW SIGNATURE)

Deborah Dotson

**VERIFICATION**

My name is Dana Smith and I am employed by Pacific Bell Telephone. My title is Area Manager - ICSC. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 4, 5, 6, 7, 8, 9, and 30.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.



SIGNATURE

(PRINT NAME BELOW SIGNATURES)

DANA SMITH

**VERIFICATION**

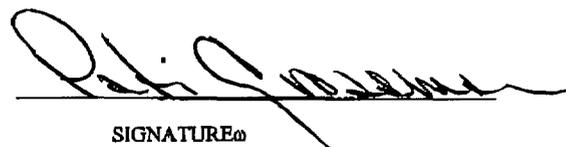
My name is Pati Grossman and I am employed by Pacific Bell Telephone. My title is Manager - ICSC. As part of my job, I been asked to assist Southwestern Bell Telephone Company representatives to respond to "Complainant's First Set of Interrogatories to Defendant," served in the case *Millicom Services Company v. Southwestern Bell Telephone Company*, EB Docket No. 01-99, File No. E-93-49.

I provided information for interrogatories nos. 4, 5, 6, 7, 8, 9, and 30.

To the best of my ability, I have determined that the responses provided Southwestern Bell Telephone Company to those interrogatories are true and correct.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on August 2, 2001.



SIGNATURE

(PRINT NAME BELOW SIGNATURE)

PATI GROSSMAN