

LAW OFFICE  
**THOMAS A. CONNELLY, P.C.**  
1007 OLIVE STREET - 2ND FLOOR  
ST. LOUIS, MISSOURI 63101  
**(314) 621-5524**

October 16, 2002

**FILED<sup>3</sup>**

**OCT 21 2002**

Secretary of the Public  
Service Commission  
Attn: Data Center  
P.O. Box 360  
Jefferson City, MO 65102-0360

**Missouri Public  
Service Commission**

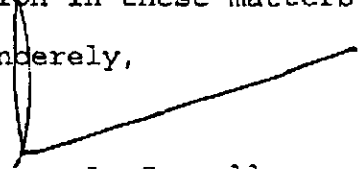
In re: Richard Halbman v.  
Southwestern Bell Telephone Company,  
St. Louis, Missouri  
Complaint

Good Morning:

Attached hereto is original and eight copies of Complaint in the above-referenced matter for filing with the Commission. Please file stamp the attached page and return in the self-addressed, stamped envelope.

Thank you for your cooperation in these matters.

Sincerely,

  
Thomas A. Connelly

TAC:gf  
Enclosures

OCT 21 2002

Company Name: SOUTHWESTERN BELL TELEPHONE  
COMPANY, ST. LOUIS, MISSOURI  
(SBC) Respondent

**COMPLAINT**

Complainant resides at 75 Klamberg Lane, Ellisville, Missouri 63021  
(address of complainant)

1. Respondent, Southwestern Bell Telephone Company  
(company name)

of P.O. Box 3549, Oak Park, Illinois is a public utility under the  
(location of company) 60303-3549  
jurisdiction of the Public Service Commission of the State of Missouri.

**2. As the basis of this complaint, Complainant states the following facts:**

See attached statement marked Exhibit A.

3. The Complainant has taken the following steps to present this complaint to the Respondent:

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

**WHEREFORE, Complainant now requests the following relief:**

1. Order SBC to allow me to have residential service without my having to disclose my Social Security Number; and
2. Order SBC to accept a copy of my driver's license and deed to my residence as proof of my identity (as they originally agreed with Mo.PSC; and
3. I will pay a deposit of not more than six (6) months cost of base residential phone service to be held by SBC for eighteen (18) months.

Date \_\_\_\_\_

Richard Hallman  
Signature of Complainant

Attach additional pages, as necessary.  
Attach copies of any supporting documentation.

EXHIBIT A

Complainant has made four requests for telephone service to Southwestern Bell Telephone Company (SBC).

The first request was made in February 2002, and a deposit was taken by SBC. The deposit was taken by making a charge to my credit card account, thereby providing confirmation of my credit worthiness. I was given a phone number and a date for installation. My residence, which I own, is prewired for telephone service and a previous owner had telephone service.

Time passed without service being installed. I, then made a second request for service and another deposit was taken by SBC against my credit card. On both occasions, I was asked to give my Social Security Number, which I refused to provide, indicating I considered that to be an invasion of my right to privacy. I am also concerned because of rampant identity theft credit fraud. I do not owe SBC for previous telephone service.

In order to resolve this problem, I offered to provide other forms of identification and pay a larger deposit, but my offer was declined (ie., deed to residence where service was applied for). I also offered to bring my driver's license to any location in the St. Louis area for SBC's verification of my identity.

All of these offers were not acceptable to SBC. I then contacted the Missouri Public Service Commission, Maryland Heights Office, who called the St. Louis office of SBC and then told me I

could take my identification to that office. When I called the St. Louis contact person to make an appointment, I was denied an appointment rather abruptly. I also contacted Birch, Sage, and other phone companies for service, but was told SBC was the only phone company that could hook up my service, since SBC owned all of the telephone lines. These other companies indicated that they would be glad to sell me service after I was connected. I desire only residential service with no long distance service.