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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 10, 2000

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
Room TW-A324
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Ms. Salas:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Wright State University currently has over 14,500 full-time students and 1,900 full-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunicati

ons department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP servi ce) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to ide ntify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a crit ical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect o ur institution from unauthorized CPP calls. A student or employee ca n hear the notification, but the institution will never be able to bil l that student or employee for his/her charges. Without some means to screen and block calls, it will take very little

time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wright S tate University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained b udget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of u nauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by AC UTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. W ith very little effort, and at almost no cost, our PBXs could be progr ammed to recognize the designated CPP SAC(s) in exactly the same way t hat they are programmed to recognize the numbering patterns of other c hargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next- generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concern ed when we face the prospect of uncertain or uncontrollable external c osts. On our campus, wireless telephones have become increasingly pop ular, particularly with students. Thus, our concern about the likelih ood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is u ndeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours - by assigning a unique SAC to all CPP numbers. We appreciate the opportun

ity to offer the Commission our views on this matter, and we look forw ard to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

February 10, 2000

Chairman William E. Kennard
Federal Communications Commission
Room 8-B201
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offerin g in the Commercial Mobile Radio Services

Dear Chairman Kennard:

As a member of ACUTA: the Association of Telecommunication Pr ofessionals in Higher Education, Wright State University has closely f ollowed the Calling Party Pays ("CPP") rulemaking proceeding and stron gly supports the positions expressed in ACUTA's comments. Like many AC UTA members, we are a non-profit educational institution deeply concer ned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Wright State University currently has over 14,500 full-time st udents and 1,900 full-time employees. With an extensive telecommunica tions infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauth orized CPP calls.

Currently, students and employees place telephone calls from e xtensions in campus buildings that are routed through a centralized PB X controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call service s (i.e., calls to "900" numbers), based on the unique numbering scheme s associated with these types of calls. For example, when a student p laces a long distance call from his/her dormitory room, the PBX recogn izes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunicati ons department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP servi ce) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to ide ntify the call and request the authorization code we need to bill the toll to the cost-causing party.

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As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours - by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

CC: Mr. Ari Fitzgerald
Legal Advisor to Chairman Kennard

February 10, 2000

Commissioner Susan Ness
Federal Communications Commission
Room 8-B115
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Ness:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours - by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

CC: Mark Schneider
Senior Legal Advisor to Commissioner Ness

February 10, 2000

Commissioner Harold W. Furchtgott-Roth
Federal Communications Commission
Room 8-A302
445 Twelfth Street, SW

Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Furchtgott-Roth:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Wright State University currently has over 14,500 full-time students and 1,900 full-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

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We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little

time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wright State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next- generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours - by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

CC: Bryan Tramont
Legal Advisor to Chairman Furchtgott-Roth

February 10, 2000

Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Powell:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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We agree that verbal notification to calling parties is a crit ical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect o ur institution from unauthorized CPP calls. A student or employee ca n hear the notification, but the institution will never be able to bil l that student or employee for his/her charges. Without some means to screen and block calls, it will take very little

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Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

CC: Peter A. Tenhula
Senior Legal Advisor to Commissioner Powell

February 10, 2000

Commissioner Gloria Tristani
Federal Communications Commission
Room 8-C302
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Commissioner Tristani:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Paul R. Hernandez

Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

CC: Adam Krinsky
Legal Advisor to Commissioner Tristani

February 10, 2000

Thomas Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C252
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Sugrue:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our

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Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

February 10, 2000

James D. Schlichting
Deputy Bureau chief
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of u nauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by AC UTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. W ith very little effort, and at almost no cost, our PBXs could be progr ammed to recognize the designated CPP SAC(s) in exactly the same way t hat they are programmed to recognize the numbering patterns of other c hargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next- generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concern ed when we face the prospect of uncertain or uncontrollable external c osts. On our campus, wireless telephones have become increasingly pop ular, particularly with students. Thus, our concern about the likelih ood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is u ndeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours - by assigning a unique SAC to all CPP numbers. We appreciate the opportun ity to offer the Commission our views on this matter, and we look forw ard to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

February 10, 2000

Joe Levin
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-B135
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offerin g in the Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunication Pr ofessionals in Higher Education, Wright State University has closely f

ollowed the Calling Party Pays ("CPP") rulemaking proceeding and stron gly supports the positions expressed in ACUTA's comments. Like many AC UTA members, we are a non-profit educational institution deeply concer ned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Wright State University currently has over 14,500 full-time st udents and 1,900 full-time employees. With an extensive telecommunica tions infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauth orized CPP calls.

Currently, students and employees place telephone calls from e xtensions in campus buildings that are routed through a centralized PB X controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call service s (i.e., calls to "900" numbers), based on the unique numbering scheme s associated with these types of calls. For example, when a student p laces a long distance call from his/her dormitory room, the PBX recogn izes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunicati ons department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP servi ce) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to ide ntify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a crit ical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect o ur institution from unauthorized CPP calls. A student or employee ca n hear the notification, but the institution will never be able to bil l that student or employee for his/her charges. Without some means to screen and block calls, it will take very little

time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wright S tate University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained b udget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of u nauthorized CPP calls. We have considered the many options available

and have consistently supported the numbering solution advocated by AC UTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. W ith very little effort, and at almost no cost, our PBXs could be progr ammed to recognize the designated CPP SAC(s) in exactly the same way t hat they are programmed to recognize the numbering patterns of other c hargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next- generation equipment that could distinguish CPP calls without identifiable numbering.

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Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

February 10, 2000

David Siehl
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-A164
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

Dear Mr. Siehl:

As a member of ACUTA: the Association of Telecommunication Professionals in Higher Education, Wright State University has closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Wright State University currently has over 14,500 full-time students and 1,900 full-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recogn

izes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little

time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Wright State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next- generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and

accommodate the needs of educational institutions such as ours - by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
Dayton, Ohio 45435

February 10, 2000

Kris Monteith
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C122
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

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Dear Ms. Monteith:

As a member of ACUTA: the Association of Telecommunication Pr ofessionals in Higher Education, Wright State University has closely f ollowed the Calling Party Pays ("CPP") rulemaking proceeding and stron gly supports the positions expressed in ACUTA's comments. Like many AC UTA members, we are a non-profit educational institution deeply concer ned that without appropriate safeguards, CPP will expose Wright State University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Paul R. Hernandez
Director
Computing & Telecommunications Services
Wright State University
3640 Col. Glenn Highway
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