

Memorandum

To: Chairman William E. Kennard
Federal Communications Commission
Room 8-B201
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-2801

RECEIVED

Date: February 10, 2000

File:

FEB 11 2000

Copies: Mr. Ari Fitzgerald,
Legal Advisor to
Chairman Kennard

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

From: Jerry Hanley

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

Dear Chairman Kennard:

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

Cal Poly currently has over 16,400 students and more than 3,400 full and part time faculty and staff members. With an extensive telecommunications infrastructure that is accessible to such a large number of faculty, staff and student users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, faculty, staff and student users place telephone calls from extensions in campus buildings that are routed through a centralized private branch exchange (PBX) administered by my Telecommunication Services group. Our existing PBX can easily be programmed to block, or track call detail for a variety of calls, such as toll calls (1+area code and number) and calls to pay-per-call services (i.e., calls to 1+900 or 1+area code+976 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 residence hall room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our call accounting system 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 university from unauthorized CPP calls. A faculty, staff or student user can hear the notification, but the university will never be able to bill that faculty, staff or student user 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 Cal Poly. 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 colleges and universities 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 (SAC) to CPP numbers. With very little effort, and at almost no cost, our PBX 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 university the considerable expense and the disruption of replacing the PBX 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,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Mr. Thomas Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C252
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-0787

Date: February 10, 2000

File:

From: Jerry Hanley

Subject: 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 Telecommunications Professionals in Higher Education, California Polytechnic State University (Cal Poly), San Luis Obispo has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA comments. Like many ACUTA members, we are a non-profit educational institution that is deeply concerned that without appropriate safeguards, CPP will expose Cal Poly to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

M e m o r a n d u m

To: Commissioner Susan Ness
Federal Communications Commission
Room 8-B115
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-2821
Commissioner Ness

Date: February 10, 2000

File:

Copies: Mr. Mark Schneider,
Senior Legal Advisor to

From: Jerry Hanley

Subject: 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 Telecommunications Professionals in Higher Education, California Polytechnic State University (Cal Poly), San Luis Obispo has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA comments. Like many ACUTA members, we are a non-profit educational institution that is deeply concerned that without appropriate safeguards, CPP will expose Cal Poly to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-2820

Date: February 10, 2000

File:

Copies: Mr. Peter A. Tenhula,
Senior Legal Advisor to
Commissioner Powell

From: Jerry Hanley

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

Dear Commissioner Powell:

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Commissioner Harold W. Furchtgott-Roth
Federal Communications Commission
Room 8-A302
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-2802

Date: February 10, 2000

File:

Copies: Mr. Bryan Tramont,
Legal Advisor to
Commissioner
Furchtgott-Roth

From: Jerry Hanley

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

Dear Commissioner Furchtgott-Roth:

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Commissioner Gloria Tristani
Federal Communications Commission
Room 8-A302
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-7542

Date: February 10, 2000

File:

Copies: Mr. Adam Krinsky,
Legal Advisor to
Commissioner Tristani

From: Jerry Hanley

Subject: 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 Telecommunications Professionals in Higher Education, California Polytechnic State University (Cal Poly), San Luis Obispo has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA comments. Like many ACUTA members, we are a non-profit educational institution that is deeply concerned that without appropriate safeguards, CPP will expose Cal Poly to significant financial liability that would undermine our ongoing effort to provide educational services.

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Mr. James D. Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-0787

Date: February 10, 2000

File:

From: Jerry Hanley

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

Dear Mr. Schlichting:

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

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

Date: February 10, 2000

File:

From: Jerry Hanley

Subject: 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 Telecommunications Professionals in Higher Education, California Polytechnic State University (Cal Poly), San Luis Obispo has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA comments. Like many ACUTA members, we are a non-profit educational institution that is deeply concerned that without appropriate safeguards, CPP will expose Cal Poly 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 critical prerequisite to the implementation of CPP in a way that protects consumers. But, this kind of notification by itself would not protect our university from unauthorized CPP calls. A faculty, staff or student user can hear the notification, but the university will never be able to bill that faculty, staff or student user 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 Cal Poly. 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 colleges and universities 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 (SAC) to CPP numbers. With very little effort, and at almost no cost, our PBX 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 university the considerable expense and the disruption of replacing the PBX 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,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Mr. Joe Levin
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-B135
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-7247

Date: February 10, 2000

File:

From: Jerry Hanley

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

Dear Mr. Levin:

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

Cal Poly currently has over 16,400 students and more than 3,400 full and part time faculty and staff members. With an extensive telecommunications infrastructure that is accessible to such a large number of faculty, staff and student users, we face the very real threat of uncontrollable, unauthorized CPP calls.

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Sincerely,

Jerry Hanley
Vice Provost / Chief Information Officer

Memorandum

To: Ms. Kris Monteith
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C122
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-7247

Date: February 10, 2000

File:

From: Jerry Hanley

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

Dear Ms. Monteith:

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

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Sincerely,

Jerry Hanley
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Memorandum

To: Mr. David Siehl
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-A164
445 Twelfth Street, SW
Washington, DC 20554
Fax: (202) 418-7247

Date: February 10, 2000

File:

From: Jerry Hanley

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

Dear Mr. Siehl:

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