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WT Pocket 97-207

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ROSE-HULMAN
INSTITUTE OF TECHNOLOGY
OFFICE OF ADMINISTRATIVE SERVICES

Mr. James D. Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Mr. Schlichting:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Rose-Hulman Institute of Technology 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 Rose-Hulman Institute of Technology to significant financial liability that would undermine our ongoing effort to provide educational services.

Rose-Hulman Institute of Technology currently has over 1619 students and 361 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 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.

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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 Rose-Hulman Institute of Technology. Even a small percentage of calls made to CPP number 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 view 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,



Dan Wells
Director of Administrative Services

jg

cc: Magalie Roman Salas
Secretary

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WT Docket 97-207

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Admin
MINNESOTA

Department of Administration

February 9, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

InterTechnologies Group
Room 510
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St. Paul, MN 55155
651.296.8888
Fax: 651.296.6362
TTY: 651.296.3931

Mr. James D. Schlichting
Deputy Bureau Chief
Wireless Telecommunication Bureau
Federal Communications Commission
Room 3-C254
445 12th Street SW
Washington, DC 20554

Dear Mr. Schlichting:

As a member of the National Association of State Telecommunications Directors (NASTD) and the Association of Telecommunications Professionals in Higher Education (ACUTA), the State of Minnesota's Department of Administration, has become aware of the Calling Party Pays ("CPP") rulemaking proceedings at the Federal Communications Commission (the Commission), and strongly supports the positions expressed in ACUTA's comments.

The Department of Administration manages telecommunications services for educational institutions, state hospitals, and other governmental agencies and are deeply concerned that without appropriate safeguards, CPP will expose the Minnesota state agencies and education institutions to significant financial liability that would undermine our ongoing effort to provide services to students, patients and the public.

Our agency currently manages services for over 100,000 students, patients and employees. With an extensive telecommunications infrastructure accessible to such a large number of student, patient and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls and their charges.

In most cases students, patients and employees place telephone calls from lines which are routed through centralized phone systems such as Centron or PBX's controlled by our department. Our existing systems and long distance networks 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 person places a long distance call from his/her phone line, the system recognizes the 1+ dialing pattern and knows to either request an authorization code before completing the call or to block the call if the station is not authorized to make 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 phone systems and networks 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 institutions from unauthorized CPP charges. A student, patient or employee can hear the notification and proceed with the call, but the institution will never be able to bill that student, patient or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus, hospital, and employee populations to learn those "free" calls

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Mr. James D. Schlichting

Page 2

February 9, 2000

can be made to CPP numbers, the cost of which will ultimately be borne by the State. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budgets.

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 Centrons, PBXs and networks 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 institutions and agencies the considerable expense and disruption of replacing the systems they have in use today with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

We are always concerned when we face the prospect of uncertain or uncontrollable external costs. Wireless telephones have become increasingly popular. 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 governmental and 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,



Jack Yarbrough

Assistant Commissioner

State of Minnesota

Department of Administration

InterTechnologies Group

C: Commissioner David Fisher
Minnesota Department of Administration

Confirmation of Feb. 9, 2000

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SANTA BARBARA • SANTA CRUZ

SENIOR VICE PRESIDENT –
BUSINESS AND FINANCEOFFICE OF THE PRESIDENT
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

February 10, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

James D. Schlichting
Deputy Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Office of the Secretary
Room 8-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. Schlichting:

As a member of ACUTA, the Association of Telecommunications Professionals in Higher Education, the University of California has 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 the University of California to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of California currently has over 170,000 full-and part-time students and 140,000 full and part 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 at our nine campuses place telephone calls from extensions in campus buildings that are routed through centralized PBX or telephone company Centrex systems administered by the telecommunications departments at each campus. Our existing telephone systems can 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 telecommunications departments 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

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Mr. James D. Schlichting
February 10, 2000
Page Two

use the same type of numbering scheme as toll calls under the North American Numbering Plan, our telephone systems 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 University of California campuses. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on campus budgets.

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. The University of California supports the numbering solution advocated by ACUTA as the most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls. Specific Service Access Codes ("SACs") should be assigned only 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 could also save the considerable expense and disruption of replacing the PBX systems currently 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 campuses 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 unique SAC's 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,

Michael Shannon
Manager, Telecommunications
Services

cc: Magalie Roman Salas



OSWEGO

STATE UNIVERSITY OF NEW YORK
OSWEGO, NEW YORK 13126

February 10, 2000

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Mr. Schlichting:

I am Jerry DeSantis, Interim Vice President of Finance and Administration at Oswego State University of New York. As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Oswego State 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 our University to significant financial liability that would undermine our ongoing effort to provide educational services.

Oswego State University of New York currently has nearly 8,000 students and 1,000 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 (which will bill for) and calls to pay-per-call services (i.e., calls to "900" numbers, which we block), 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 requests 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 billing as toll calls scheme (i.e. different rate plans, roaming charges etc.) we will not be able to accurately rebill the calling party at the time the call is placed. Given the

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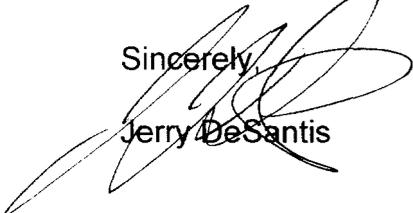
transient nature of our students (a normal 25% turnover annually) the caller may not be part of our system by the time the bill is received on campus. This is especially true for calls placed near the end of the semester.

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 Oswego State. 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,



Jerry DeSantis

Yale University

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University Director
 Information Technology
 175 Whitney Avenue
 P.O. Box 208276
 New Haven, Connecticut 06520-8276

February 10, 2000

Mr. James D. Schlichting
 Deputy Bureau Chief,
 Wireless Telecommunications Bureau
 Federal Communications Commission
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 Washington, DC 20554

Telephone: 203 432-3262

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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 Telecommunications Professionals in Higher Education, Yale 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 Yale University to significant financial liability that would undermine our ongoing effort to provide educational services.

Yale University currently has over 10,000 students and 10,300 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 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 Yale University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

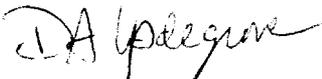
We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and 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

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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. 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,


Daniel A. Updegrove