

**Attached documents are prohibited presentations received during the Sunshine Agenda period and associated with, but not made a part of, the record in 97-207.**



OCCIDENTAL COLLEGE  
1600 CAMPUS ROAD  
LOS ANGELES, CA 90041-3314

## SUNSHINE PERIOD

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FEB 14 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

Occidental College currently has over 1600 students and 500 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 Occidental College. 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

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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,



William E. Barr

Director of Administrative Services  
Occidental College



# OSWEGO

STATE UNIVERSITY OF NEW YORK  
OSWEGO, NEW YORK 13126

February 10, 2000

SUNSHINE PERIOD

RECEIVED  
FEB 14 2000  
COMMUNICATIONS

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:

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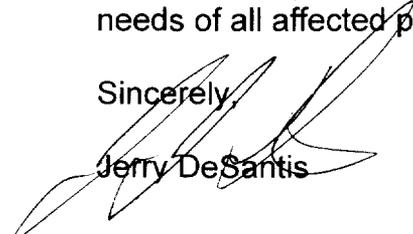
transient nature of our students (a normal 25% turnover annually) the caller may not be part of our system by the time the bill is received on campus. This is especially true for calls placed near the end of the semester.

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



IOWA ASSOCIATION OF INDEPENDENT COLLEGES AND UNIVERSITIES  
505 5th Avenue, Suite 1030  
Des Moines, Iowa 50309-2399  
515/282-3175

SUNSHINE PERIOD

Facsimile Phone: 515/282-9508

Please Deliver Immediately To:

Commissioner Powell

Facsimile Phone: 202-418-2820

Date:

From: Hea Hartung

No. Of Pages Including Cover Sheet:

Message:

**Iowa Association of Independent Colleges and Universities**

505 Fifth Avenue, Suite 1030  
Des Moines, Iowa 50309-2399  
515-282-3175 • FAX 515-282-9508  
John V. Hartung, President

February 12, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street SW  
Washington, DC 20554  
202/418-2820

Dear Commissioner Powell:

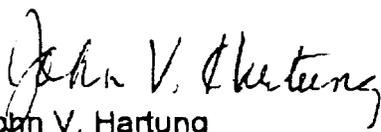
It has come to my attention that you are looking at a proposal to have those placing calls to people using wireless phones pay for the cost of the call. While I can understand that this would be desired by the cellular phone vendors and would encourage those persons with cellular phones to more widely distribute their phone number, it will wreak havoc with the current billing system and the baseline services with which all callers have become familiar.

Frankly I am surprised that the FCC would consider such an action. Currently, those of us in higher education have a limited number of resources and large residential campus facilities with the ability to individually track and allocate long-distance calls to particular callers. The adoption of a provision for a caller fee for local cellular calls would place the burden of payment upon the institution, which could not be equitably distributed across the student body, faculty, or staff.

There is, of course, the option of assigning a special area code for all cellular phones. This would require 10-digit dialing for those wishing to reach a cellular user and would allow identification. If, indeed, provisions are going to be made to charge the caller, it seems to me that this is the answer.

Thank you very much for your consideration in this matter.

Sincerely,

  
John V. Hartung  
President

CC: Peter A. Tenhula, Senior Legal Advisor



IOWA ASSOCIATION OF INDEPENDENT COLLEGES AND UNIVERSITIES  
505 5th Avenue, Suite 1030  
Des Moines, Iowa 50309-2399  
515/282-3175

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Facsimile Phone: 515/282-9508

**Please Deliver Immediately to:**

Peter Tenhula, Legal Advisor

Facsimile Phone: 202-418-2820

Date: \_\_\_\_\_

From: \_\_\_\_\_

No. Of Pages Including Cover Sheet: \_\_\_\_\_

Message:

**Iowa Association of Independent Colleges and Universities**

505 Fifth Avenue, Suite 1030  
Des Moines, Iowa 50309-2399  
515-282-3175 • FAX 515-282-9508  
John V. Hartung, President

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Federal Communications Commission  
Room 8-A204  
445 Twelfth Street SW  
Washington, DC 20554  
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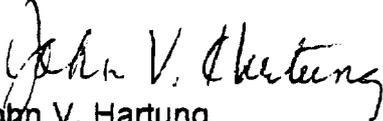
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Thank you very much for your consideration in this matter.

Sincerely,

  
John V. Hartung  
President

CC: Peter A. Tenhula, Senior Legal Advisor



Cleveland State University  
1860 E 22 St, RT1002  
Cleveland, Ohio 44115

February 10, 2000

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 6-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 Telecommunications Professionals in Higher Education, Cleveland State University has closely followed the Calling Party Pays 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 Cleveland State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Cleveland State University currently has over 15,000 full- and part-time students and 1000 full and part 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 Cleveland 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 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,

*Joan Boatman*

Joan Boatman  
System Supervisor, Telecommunications



**Boston University**

Office of Telecommunications  
25 Buick Street  
Boston, Massachusetts 02215  
Tel: 617/353-2097  
Fax: 617/353-2053



A Unit of Information Technology

February 14, 2000

**SUNSHINE PERIOD**

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

Boston University currently has over 30,000 full-time students and 10,000 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 Centrex and PBX system controlled by the telecommunications department. Our existing systems 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 Centrex 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 system 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 Boston 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 system 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 considerable expense.

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,



James A. Shea  
Director of Telecommunications  
Boston University

cc: Mr. Peter A. Tenhula, Senior Legal Advisor

**Boston University**

Office of Telecommunications  
25 Buick Street  
Boston, Massachusetts 02215  
Tel: 617/353-2097  
Fax: 617/353-2053



A Unit of Information Technology

February 14, 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

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Sincerely,



James A. Shea  
Director of Telecommunications  
Boston University

cc: Mr. Peter A. Tenhula, Senior Legal Advisor