



# PUBLIC NOTICE

Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554

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Released: February 17, 2000  
97826

NOTICE OF PROHIBITED PRESENTATIONS  
IN THE MATTER OF CALLING PARTY PAYS SERVICE OFFERING  
IN THE COMMERCIAL MOBILE RADIO SERVICES  
WT DOCKET NO. 97-207

Notice is hereby given that prohibited presentations concerning the above-referenced proceeding (WT Docket No. 97-207) have been received by the Commission. Section 1.1203 of the Commission's Rules, 47 C.F.R. § 1.1203, prohibits the making of any presentation, whether ex parte or not, to decision-making personnel concerning any matter listed on the Commission's Sunshine Agenda until the Commission releases the text of a decision or order relating to that matter. The instant presentations addressed the merits of WT Docket No. 97-207, which was included in the Commission's Sunshine Agenda by Public Notice dated February 10, 2000. Accordingly, under Section 1.1212 of the Commission's Rules, 47 C.F.R. § 1.1212, these presentations, and any similar presentations also received during the Sunshine Agenda period, shall be associated with, but not made a part of, the record in WT Docket No. 97-207.

Action by Assistant General Counsel, Administrative Law Division



SUNSHINE PERIOD

Office of Telecommunications  
105 Rod K. Shaw Building  
Tallahassee, FL 32306-1120  
(850) 644-4208  
(850) 644-4554 Fax

RECEIVED

FEB 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

February 10, 2000

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

Florida State University currently has over thirty thousand students and nine thousand 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 place telephone calls from extensions in campus buildings that are routed through a centralized switch. 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.

List ABCDE

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 our institution. 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.

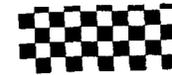
Sincerely,



Paul A. Strouts, Assistant Vice President  
Finance and Administration

PAS/jcm

cc: Magalie Roman Salas, Secretary (2 copies for filing in record)



To:

Commissioner Michael K. Powell

From:

Joan Boatman

Telephone

Fax Number

CC:

202-418-2820

Telephone

Fax Number

Total # of Pages

(216) 687-3881

(216) 523-7500

3

REMARKS:



Urgent



For your review



Reply ASAP



Please comment

Additional Message:

SUNSHINE PERIOD

Cleveland, Ohio 44115

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 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.

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SUNSHINE PERIOD

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SUNSHINE PERIOD

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

## VANDERBILT UNIVERSITY

NASHVILLE, TENNESSEE 37203

TELEPHONE (615) 322-7311

*Department of Telecommunications • 2015 Terrace Place • Fax Number (615) 343-5555 • Direct phone 322-0000*

February 10, 2000

**SUNSHINE PERIOD**

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S. W.  
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, Vanderbilt 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 education institution deeply concerned that without appropriate safeguards, CPP will expose Vanderbilt University to significant financial liability that would undermine our ongoing effort to provide educational services.

Vanderbilt University currently has over 10,000 students, and 16,000 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 place telephone calls from extensions on 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 call 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.

Commissioner Powell

Page 2

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 employees for 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 Vanderbilt 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 presentation 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 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 education 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,

  
Glen Miller  
Director of Telecommunications  
Vanderbilt University

Cc: Peter A. Tenhula

## VANDERBILT UNIVERSITY

NASHVILLE, TENNESSEE 37203

TELEPHONE (615) 322-7311

*Department of Telecommunications • 2015 Terrace Place • Fax Number (615) 343-5555 • Direct phone 322-0000*

February 10, 2000

**SUNSHINE PERIOD**

Commissioner Michael K. Powell  
Federal Communications Commission  
Room 8-A204  
445 Twelfth Street, S. W.  
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, Vanderbilt 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 education institution deeply concerned that without appropriate safeguards, CPP will expose Vanderbilt University to significant financial liability that would undermine our ongoing effort to provide educational services.

Vanderbilt University currently has over 10,000 students, and 16,000 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 place telephone calls from extensions on 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 call 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.

Commissioner Powell

Page 2

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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 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 presentation 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 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 education 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,

  
Glen Miller  
Director of Telecommunications  
Vanderbilt University

Cc: Peter A. Tenhula

# SEWANEE

The University of the South

Office of the Vice-Chancellor and President  
735 University Avenue  
Sewanee, Tennessee 37383-1000

Telephone: (931) 598-1101  
Fax: (931) 598-1318

SUNSHINE PERIOD

ATTENTION: Peter A. Lembula fax 202-418-2802  
FROM: Samuel Williamson  
DATE: 2/10/00

Page 1 of 3 pages

\*If you do not receive all pages, please call 931-598-1101.



# SEWANEE

*The University of the South*

*Office of the Vice-Chancellor and President*

February 10, 2000

VIA FACSIMILE  
202-418-2802

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, The University of the South 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 The University of the South to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of the South currently has over 1,400 full-time students and approximately 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.

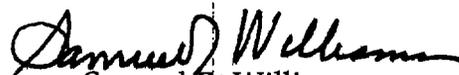
Michael K. Powell  
February 10, 2000  
Page 2

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Sincerely,

  
Samuel R. Williamson

SRW:cb

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



# SEWANEE

*The University of the South*

*Office of the Vice-Chancellor and President*

February 10, 2000

VIA FACSIMILE  
202-418-2802

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

**SUNSHINE PERIOD**

Dear Commissioner Powell:

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

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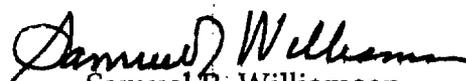
Michael K. Powell  
February 10, 2000  
Page 2

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Sincerely,

  
Samuel R. Williamson

SRW:cb

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



February 10, 2000

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

## SUNSHINE PERIOD

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, University of Idaho 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 the University of Idaho to significant financial liability that would undermine our ongoing effort to provide educational services. University of Idaho currently has 10,000 students and 2500 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 system controlled by the telecommunications department. Our existing system can easily be programmed to block, or track call detail for 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 system 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.

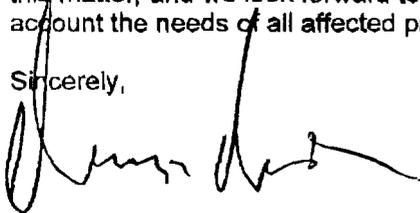
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the 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 the University of Idaho. 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, 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 the considerable expense and disruption of replacing the system 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,

A handwritten signature in black ink, appearing to read "Harvey Hughett", written over the word "Sincerely,".

Harvey Hughett  
Director, Information Technology Services



VANDERBILT UNIVERSITY TELECOMMUNICATIONS

2015 TERRACE PLACE

BOX 7702, STATION B

NASHVILLE, TENNESSEE 37235

(615) 322-0000

FAX (615) 343-2508



SUNSHINE PERIOD

Date: 2/10/00

Please rush this to:

Commissioner Powell

Telephone Number:

& Peter Texada

Fax Telephone Number:

602-418-2802

This Fax was sent by:

Glenn Miller

Number of pages following:

4

COMMENTS/NOTES:

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\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
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If you have any problems or questions, please call the Vanderbilt University, Department of Telecommunications.

# RIVERSIDE COMMUNITY COLLEGE

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Moreno Valley Campus • Norco Campus • Riverside City Campus

February 10, 2000

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

**SUNSHINE PERIOD**

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, Riverside Community 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 Riverside Community College to significant financial liability that would undermine our ongoing effort to provide educational services.

Riverside Community College currently has 26,339 students and 1,671 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, employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the Information Services 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 staff member places a long distance call from his/her desk, 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.



Moreno Valley Campus • 16130 Lasselle Street, Moreno Valley, California 92551-2045 • (909) 485-6100 • FAX (909) 485-6188  
Norco Campus • 2001 Third Street, Norco, California 91760-2600 • (909) 372-7000 • FAX (909) 372-7050  
Riverside City Campus • 4800 Magnolia Avenue, Riverside, CA 92506-1299 • (909) 222-8000 • FAX (909) 222-8036

Commissioner Powell, Feb 9, 2000

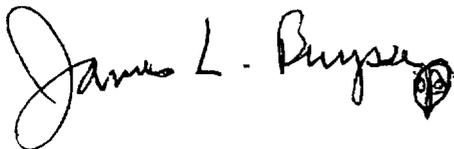
Page 2

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. An employee can hear the notification, but the institution will never be able to bill that 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 Riverside Community College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

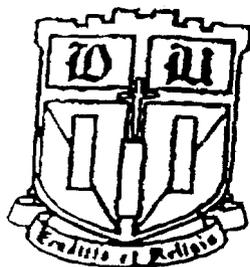
We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and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



James L. Buysse  
Vice President, Administration and Finance



Duke University Office of Information Technology

DURHAM, NORTH CAROLINA 27708

FACSIMILE TRANSMITTAL FORM

SUNSHINE PERIOD

DATE 2/10/00

TO

NAME: Commissioner Michael K. Powell
LOCATION: Federal Communications Commission
FAX NUMBER: (202) 418-2820
VOICE NUMBER:

FROM

NAME: Paula Loendorf
LOCATION: Duke University Tel-Corn Bldg.
FAX NUMBER: (919) 684-8817
VOICE NUMBER: (919) 681-3524

COMMENTS

This document consists of 3 pages including this cover sheet. If you have any questions or transmittal problems, please call voice number

Duke University  
Durham, North Carolina  
27708-0009

Vice President for Information Technology  
and Chief Information Officer

Office of Information Technology  
11 Allen Building, Box 90009  
Telephone (919) 684-5300  
Facsimile (919) 684-5390  
E-mail: bettyr@mail.duke.edu

February 10, 2000

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

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, Duke University 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 cost-conscious educational and health care institution deeply concerned that without appropriate safeguards, CPP will expose Duke University to significant financial liability that would undermine our ongoing effort to provide educational services.

Duke University currently has over 12,000 students and over 30,000 employees, including a large medical center. With an extensive telecommunications infrastructure accessible to such a large number of students, employees, and visitors, 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 switching 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 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 system 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 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 Duke 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 systems 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 systems we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a cost-conscious educational and health care 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,

*Betty B. Leydon*

Betty B. Leydon

Vice Provost for Information Technology  
And Chief Information Officer

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



Information Technology  
(714) 278-2601 / Fax (714) 278-3990

## SUNSHINE PERIOD

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

Dear Commissioner Powell

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

California State University, Fullerton agrees wholeheartedly that CPP service should be permitted and encouraged provided that consumer protection as described in FCC 99-137(June 10, 1999) is implemented. We note with concern what appears to be a reluctance to provide institutions with PBX or Centrex systems a reasonable method to identify and account for such calls. Our Call Accounting System, like most we have seen, rates calls based on the dialed number and a rate table. Were CPP calls to be indistinguishable from local or toll calls, the amount we recharge our departments for usage may be substantially different from the amount we owe carriers or a host of mobile service providers.

Our experience with carriers and other providers leads us to believe that they are not good at providing even rudimentary information which would allow us to reconcile billing information, such as which station placed the call.

Although billing practices may not fall under the FCC, we are concerned about the potential for fraud and confusion should the University begin to receive invoices claiming to be from service providers wanting compensation for what they claim are calls to their CPP subscribers, but for which they can provide no accurate information to allow us to reconcile the charges. Although following the FCC's logic in para. 50 & 51, persons who make calls from University phones could be seen as agents for the University and thus creating an implied contract to pay for CPP services, the University follows strict state regulations which forbid employees from entering into contracts except through narrowly prescribed procedures. With most universities now allowing local calling from most phones, we certainly do not intend for unknown persons to create contracts for us.

In short, should such an invoice arrive, our Accounts Payable department will almost certainly refuse to pay it.

Should such billing problems exist, as I believe they will, the appropriate action by the University is to block such calls until proper billing arrangements can be instituted. If CPP service cannot be separated from local and toll service, we have no effective tools with which to regulate service.



*Information Technology*  
(714) 278-2601 / Fax (714) 278-3990

We agree completely with the Association of College and University Telecommunications Administrators (ACUTA) that CPP service should be clearly identified as separate from local and toll calls so that operators of PBX and Centrex systems will have the ability to block or require authorization for such calls as appropriate.

Sincerely yours,

A handwritten signature in cursive script that reads "Dick Bednar".

Dick Bednar  
Senior Director, Information Technology

Cc: ACUTA