

**BINGHAMTON
UNIVERSITY**

OFFICE OF THE ASSISTANT VICE PRESIDENT
FOR AUXILIARY SERVICES

PO Box 6000
Binghamton, New York 13902-6000
607-777-2883, Fax 607-777-6453

SUNSHINE PERIOD

February 9, 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, Binghamton 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 Binghamton University to significant financial liability that would undermine our ongoing effort to provide educational services.

Binghamton University currently has over 12,500 full-time and part-time students and over 3,500 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 PBX controlled by the telecommunications department. Our existing PBX 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.

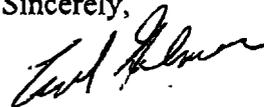
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the 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 Binghamton University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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

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

Sincerely,



Carl Gilmore
Assistant Vice President
for Administration

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



SUNSHINE PERIOD

TUFTS UNIVERSITY

facsimile transmittal

To: Comm. Powell Fax: 202-418-2820

From: Marj Minnigh Date: 2/10/00

Phone: 617-627-5103 Fax: _____

Number of Pages (including this cover): 3

Re: _____

CC: _____

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TUFTS UNIVERSITY

February 10, 2000

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

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

Dear Commissioner Powell:

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Sincerely,



Bruce Metz, Ph.D.
Vice President for Information Technology
Tufts University

Cc: Magalie Roman Salas, Secretary (2 copies for filing in record)
Mr. Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell



SUNSHINE PERIOD
TUFTS UNIVERSITY

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40 Comm. Powell Fax: 202-418-2820

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Bruce Metz, Ph.D.
Vice President for Information Technology
Tufts University

Cc: Magalie Roman Salas, Secretary (2 copies for filing in record)
Mr. Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell

FAX TRANSMISSION

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4567 ST. JOHNS BLUFF ROAD SOUTH

JACKSONVILLE, FL 32224-2659

904-620-2200

FAX: 904-620-1040

SUNSHINE PERIOD

To: Commissioner Michael K. Powell **Date:** February 10, 2000
Fax #: 202-418-2820 **Pages:** 3, including this cover sheet.
From: Larry Davis
Subject: WT Docket 97-207: Calling Party Pays Service Offering in the Commercial Mobile Radio Services

COMMENTS:

Please find attached our concerning about the above referenced subject. Thank you.



4567 St. Johns Bluff Road, South
Jacksonville, Florida 32224-2645
(904) 620-2000 Fax (904) 620-2010

ADMINISTRATION AND FINANCE
Office of the Vice President

February 10, 2000

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) the University of North Florida (UNF) 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 UNF to significant financial liability that would undermine our ongoing effort to provide educational services.

UNF currently has over 12,240 students and 1,702 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 local exchange controlled by the telecommunications department. Our local exchange 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 local exchange 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 local exchange 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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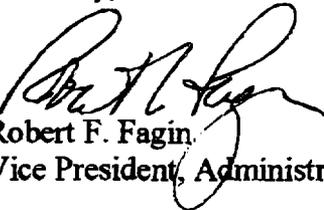
Commissioner Powell
February 10, 2000
Page 2

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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 presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SAC) to CPP numbers. With very little effort, and at almost no cost, our central office 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.

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.

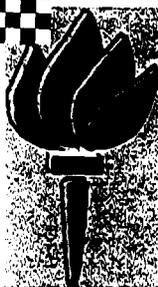
Sincerely,



Robert F. Fagin
Vice President, Administration & Finance

RFF:mid

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



New York University
Charles Kuhlman
Telecommunications Department
7 East 12th Street, 5th floor
New York, New York 10003 USA
Voice 212-998-1234
Fax 212-995-4040
cck1@is.nyu.edu

Telefax Nr.
Transmissão de fax
Numéro télécopieur appelé
202/418-2820

10 February 2000
Thursday

EN CAS DE MAUVAISE TRANSMISSION PRIERE D'APPELER: NYU TELECOM 212-998-1230.

PER PROBLEMI DI CATTIVA RICEZIONE CONTATTARE TELEFONICAMENTE LO STUDIO: 212-998-1230.

CASO OCORRA FALHA TRANSMISSÃO DESTE FAX, FAVOR AVISE PELO TELEFONE 212-998-1230.

Para:
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Please deliver to:
Alla cortese attenzione di:

SUNSHINE PERIOD

Mr. Peter Tenhula
Federal Communications Commission
445 Twelfth Street, Room TW-A324
Washington, DC 20554

5 pages follow

New York University

Telecommunications Director
ITS Telecommunications Services
7 East 12th Street, 5th floor, MS 8929
New York, New York 10003-4475
212-998-1234 Fax 212-995-4040
cck1@is.nyu.edu

William Kennard
Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service

Dear Chairman Kennard,

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

New York University currently has over 30,000 full-and part-time students and 10,000 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.

New York University uses a PBX system to provide telephone service for on campus users, including students. Individual telephones are arranged with specific, hierarchical levels of calling privileges carefully designed to address security concerns, cost accounting and user needs.

The University assigns authorization codes to users. Each authorization code is assigned a hierarchical calling privilege. If a user attempts to place a call to a destination beyond the calling privilege of the telephone, the telephone system can prompt the user to enter an authorization code to raise the callers permission level to one that is adequate to make the call.

The telephone system records the details of each call, including the originating extension, the called destination, the authorization code used, the time, date and duration of the call. This data is called Call Detail Recording, or CDR.

The University utilizes billing systems, which include databases of users and authorization codes, rate tables and destination databases so that a cost can be associated with each call. The cost is then assigned to a user based on the authorization code or originating extension. So users are charged back on the basis of an agreed upon rate schedule, independently and in advance of the receipt of a carrier's telephone bill.

NYU's telephone system uses calling privilege and restriction arrangements as described below:

1. Residence hall, courtesy or other telephones located in an insecure location are limited to placing internal (intercom) calls and outside emergency calls to 911. This same telephone might be allowed to initiate "non-sent" paid calls. These are calls that should not result in billing to the University. Such calls include ones to toll free numbers and operator-assisted calls billed as collect calls or to a calling or credit card. If an attempt is made to dial other destinations, the telephone system is configured to either block the call outright, or prompt the caller to enter an authorization code, depending on security considerations. The former arrangement will be used if the telephone is located in an environment in which transient users might otherwise use the telephone to anonymously attempt to hack authorization codes. The latter arrangement would allow the University to assign the cost of the call to the responsible party.

2. Telephones in office locations are provided with the ability to place local calls without entering an authorization code, and to place other calls by entering a valid authorization code when prompted by the telephone system. The authorization code is associated with facility restriction levels (FRL), which are designed in the telephone system's routing plan. These restriction levels are designed so that an authorization code will allow a user to call only a specific band of domestic and international destinations. The design is hierarchical, so that an authorization code with a higher FRL can make calls to more destinations.

3. For operator assisted calls, the telephone system user special trunks with telephone company provided, originating line-screening services to allow sent-paid calls, while blocking non-sent-paid call attempts. This arrangement allows the University to provide all of its users with access to the Operator Service Provide of their choice, in conformance with TOSCIA. Sent-paid calls to an operator may be placed only with the assistance of the University's operator, who will manually log call information so that an attempt may be made to charge-back carrier billing to the responsible user department.

4. In general, the University blocks all calls to 900 numbers. However, calls are permitted to several business-related numbers for which the University knows the rates billed by the carrier.

5. The University blocks calls to other numbers such as 500 or 700 numbers because the carrier's rates for billing usage is unknown or otherwise unpredictable.

6. The University makes arrangements with its carriers to block "enhanced services", such as directory assistance call completion (DACC). The primary reason for blocking is that the use or non-use of this service is not detectable within the CDR record generated by the telephone system. For example, with DACC the University can not discern from the CDR record that the DACC feature had been used, and it can not determine to which telephone number the DACC feature had extended the call. So the call would need to be billed at directory assistance rates, even though other charges may have been incurred. Such a loss of accountability rapidly becomes a security loophole that will be exploited by transient users.

The University uses a carefully constructed plan to allow appropriate calling privileges based on cost considerations as well as business needs, while maintaining very effective accountability and controls. If a new type of toll call were introduced in the form of Calling Party Pays (CPP) service, and the service did not use a recognizable numbering scheme, such as that used for toll calls under the North American Numbering Plan, then the University's telephone system will be unable to identify and control the ability to call such destinations. The University would be subjected to the vagaries of cellular carrier billing. Based on prior experience with carrier billing against the originating party's telephone number, which in most cases has been improper, the University fully expects that the carriers will charge outrageous prices for CPP calls and "service fees" of \$5.00 to \$10.00 to render such bills. Such bills might be rendered per line number identified by the carrier. NYU has 32,000 DID numbers for which CPN would be transmitted over most of its trunks. This could result in an inordinate number of bills being sent to NYU and/or an inordinate number of "service charges".

Given a unique identifier within the NANP, such as a unique area code for CPP subscribers, or a unique area code used as an access code using to place CPP calls (as 14 digit calls), a published and usable rate schedule would also be required. The published rate schedule must provide uniform rates across an area code or area code exchange combination to be usable. The rates would need to be fixed per destination, and not dependent on the current physical location of the called party (roaming charges).

With identifiable calls, predictable carrier costs and reasonable carrier billing arrangements, the University would be supportive of the CPP initiative. However, without such controls, CPP would simply be a license for a carrier to bill the University exorbitant charges for CPP service. In the latter situation, the University would require that the ability to place CPP calls be provided only as an optional service for which a customer has to proactively subscribe.

Alternatively, the University recommends that CPP be provided as a non-sent paid service over existing operator services systems using 0+ dialing protocols; or that similar non-sent paid

billing prompts via operator service systems be invoked by the carrier on directly dialed calls for which CPP charges would be imposed.

One of the intentions of the FCC in considering CPP is to make wireless service providers more competitive with wireline carriers. Because the wireline telephone subscriber does not pay to receive calls, while the wireless subscriber does, the FCC initiated an inquiry to explore the feasibility of providing CPP service. While this simple argument may appear correct, and it sounds like wireline might have an unfair advantage, there are more factors at work here. For one, the consumer makes the decision to subscribe to wireless services. The consumer is aware of and agrees to the cost structure in exchange for the convenience of a non-tethered telephone. There are other very successful services; namely toll free services, for which the subscriber makes the decision to accept charges for incoming calls to obtain a marketing advantage. The wireless industry is already experiencing explosive growth, rapid decrease in rates and increasing profits. The industry does not appear to need a competitive boost using a CPP arrangement that would unfairly pass the cost of cellular subscribership to the wireline subscriber.

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Sincerely,


Charles Kuhlman
Telecommunications Director
New York University

cc:

Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Mr. Ari Fitzgerald
Mr. Mark Schneider
Mr. Bryan Tramont
Mr. Adam Krinsky
Mr. James Schlichting
Mr. Joe Levin
Mr. David Siehl
Ms. Kris Monteith
Office of Legal Counsel, New York University
Marilyn McMillan, Chief Information Technology Officer, NYU



New York University

Charles Kuhlman
Telecommunications Department
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New York, New York 10003 USA
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Fax 212-995-4040
cck1@is.nyu.edu

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Re: WT Docket No. 97-207: Calling Party Pays Service

Dear Chairman Kennard,

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

New York University currently has over 30,000 full-and part-time students and 10,000 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.

New York University uses a PBX system to provide telephone service for on campus users, including students. Individual telephones are arranged with specific, hierarchical levels of calling privileges carefully designed to address security concerns, cost accounting and user needs.

The University assigns authorization codes to users. Each authorization code is assigned a hierarchical calling privilege. If a user attempts to place a call to a destination beyond the calling privilege of the telephone, the telephone system can prompt the user to enter an authorization code to raise the callers permission level to one that is adequate to make the call.

The telephone system records the details of each call, including the originating extension, the called destination, the authorization code used, the time, date and duration of the call. This data is called Call Detail Recording, or CDR.

The University utilizes billing systems, which include databases of users and authorization codes, rate tables and destination databases so that a cost can be associated with each call. The cost is then assigned to a user based on the authorization code or originating extension. So users are charged back on the basis of an agreed upon rate schedule, independently and in advance of the receipt of a carrier's telephone bill.

NYU's telephone system uses calling privilege and restriction arrangements as described below:

1. Residence hall, courtesy or other telephones located in an insecure location are limited to placing internal (intercom) calls and outside emergency calls to 911. This same telephone might be allowed to initiate "non-sent" paid calls. These are calls that should not result in billing to the University. Such calls include ones to toll free numbers and operator-assisted calls billed as collect calls or to a calling or credit card. If an attempt is made to dial other destinations, the telephone system is configured to either block the call outright, or prompt the caller to enter an authorization code, depending on security considerations. The former arrangement will be used if the telephone is located in an environment in which transient users might otherwise use the telephone to anonymously attempt to hack authorization codes. The latter arrangement would allow the University to assign the cost of the call to the responsible party.

2. Telephones in office locations are provided with the ability to place local calls without entering an authorization code, and to place other calls by entering a valid authorization code when prompted by the telephone system. The authorization code is associated with facility restriction levels (FRL), which are designed in the telephone system's routing plan. These restriction levels are designed so that an authorization code will allow a user to call only a specific band of domestic and international destinations. The design is hierarchical, so that an authorization code with a higher FRL can make calls to more destinations.

3. For operator assisted calls, the telephone system user special trunks with telephone company provided, originating line-screening services to allow sent-paid calls, while blocking non-sent-paid call attempts. This arrangement allows the University to provide all of its users with access to the Operator Service Provide of their choice, in conformance with TOSCIA. Sent-paid calls to an operator may be placed only with the assistance of the University's operator, who will manually log call information so that an attempt may be made to charge-back carrier billing to the responsible user department.

4. In general, the University blocks all calls to 900 numbers. However, calls are permitted to several business-related numbers for which the University knows the rates billed by the carrier.

5. The University blocks calls to other numbers such as 500 or 700 numbers because the carrier's rates for billing usage is unknown or otherwise unpredictable.

6. The University makes arrangements with its carriers to block "enhanced services", such as directory assistance call completion (DACC). The primary reason for blocking is that the use or non-use of this service is not detectable within the CDR record generated by the telephone system. For example, with DACC the University can not discern from the CDR record that the DACC feature had been used, and it can not determine to which telephone number the DACC feature had extended the call. So the call would need to be billed at directory assistance rates, even though other charges may have been incurred. Such a loss of accountability rapidly becomes a security loophole that will be exploited by transient users.

The University uses a carefully constructed plan to allow appropriate calling privileges based on cost considerations as well as business needs, while maintaining very effective accountability and controls. If a new type of toll call were introduced in the form of Calling Party Pays (CPP) service, and the service did not use a recognizable numbering scheme, such as that used for toll calls under the North American Numbering Plan, then the University's telephone system will be unable to identify and control the ability to call such destinations. The University would be subjected to the vagaries of cellular carrier billing. Based on prior experience with carrier billing against the originating party's telephone number, which in most cases has been improper, the University fully expects that the carriers will charge outrageous prices for CPP calls and "service fees" of \$5.00 to \$10.00 to render such bills. Such bills might be rendered per line number identified by the carrier. NYU has 32,000 DID numbers for which CPN would be transmitted over most of its trunks. This could result in an inordinate number of bills being sent to NYU and/or an inordinate number of "service charges".

Given a unique identifier within the NANP, such as a unique area code for CPP subscribers, or a unique area code used as an access code used to place CPP calls (as 14 digit calls), a published and usable rate schedule would also be required. The published rate schedule must provide uniform rates across an area code or area code exchange combination to be usable. The rates would need to be fixed per destination, and not dependent on the current physical location of the called party (roaming charges).

With identifiable calls, predictable carrier costs and reasonable carrier billing arrangements, the University would be supportive of the CPP initiative. However, without such controls, CPP would simply be a license for a carrier to bill the University exorbitant charges for CPP service. In the latter situation, the University would require that the ability to place CPP calls be provided only as an optional service for which a customer has to proactively subscribe.

Alternatively, the University recommends that CPP be provided as a non-sent paid service over existing operator services systems using 0+ dialing protocols; or that similar non-sent paid

billing prompts via operator service systems be invoked by the carrier on directly dialed calls for which CPP charges would be imposed.

One of the intentions of the FCC in considering CPP is to make wireless service providers more competitive with wireline carriers. Because the wireline telephone subscriber does not pay to receive calls, while the wireless subscriber does, the FCC initiated an inquiry to explore the feasibility of providing CPP service. While this simple argument may appear correct, and it sounds like wireline might have an unfair advantage, there are more factors at work here. For one, the consumer makes the decision to subscribe to wireless services. The consumer is aware of and agrees to the cost structure in exchange for the convenience of a non-tethered telephone. There are other very successful services; namely toll free services, for which the subscriber makes the decision to accept charges for incoming calls to obtain a marketing advantage. The wireless industry is already experiencing explosive growth, rapid decrease in rates and increasing profits. The industry does not appear to need a competitive boost using a CPP arrangement that would unfairly pass the cost of cellular subscribership to the wireline subscriber.

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 New York 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 (SAC) 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,


Charles Kuhlman

Telecommunications Director
New York University

cc:

Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Mr. Ari Fitzgerald
Mr. Mark Schneider
Mr. Bryan Tramont
Mr. Adam Krinsky
Mr. James Schlichting
Mr. Joe Levin
Mr. David Siehl
Ms. Kris Monteith
Office of Legal Counsel, New York University
Marilyn McMillan, Chief Information Technology Officer, NYU



Lebanon Valley College of Pennsylvania

Office of the President

(717) 867-6211

February 10, 2000

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

SUNSHINE PERIOD

Dear Commissioner Powell,

Lebanon Valley College strongly supports the positions expressed in the comments of the Association of Telecommunications Professionals in Higher Education (ACUTA) on the Calling Party Pays (CPP) rulemaking proceeding. We are a non-profit educational institution deeply concerned that without appropriate safeguards, CPP will expose the college to significant financial liability that would undermine our ongoing effort to provide educational services.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX managed by the telecommunications department. Our existing PBX 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. This allows the college and its long distance partner 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, we 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 institution. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our budget.

We understand that the record before the Commission reflects a range of views on how institutions might control the level of unauthorized CPP calls. We support 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. The equipment used by the college and its long distance partner could be programmed at minimal cost to recognize the designated CPP SAC(s) in exactly the same way that it is 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 equipment already in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

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,


G. David Pollick, President

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



Office of the Vice President for Information Systems

February 10, 2000

SUNSHINE PERIOD

Chairman William E. Kennard
 Commissioner Susan Ness
 Commissioner Harold Furchtgott-Roth
 Commissioner Michael Powell
 Commissioner Gloria Tristani
 Federal Communications Commission
 445 12th Street, S.W.
 Washington, D.C. 20554

Dear Chairman and Commissioners:

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

Virginia Tech currently has over 27,000 full-time and part-time students and more than 8,000 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 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 Virginia Tech. 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,



Eaving L. Blythe
Vice President, Information Systems

Cc: Vice President Albert Gore, Jr.
Senator Charles S. Robb
Senator John W. Warner
Congressman Rick C. Boucher
Dr. Charles Steger, President, Virginia Polytechnic Institute and State University
Mr. Ralph Byers, Director of Governmental Relations, Virginia Polytechnic Institute and State University
Ms. Jeri Semer, Executive Director, ACUTA
Representative Thomas J. Bliley, Jr.
Ms. Magalie Roman Salas, Office of the Secretary, FCC
Mr. Thomas Sugrue, Chief, Wireless Telecommunications Bureau, FCC
Mr. James D. Schliching, Deputy Bureau Chief, Wireless Telecommunications Bureau, FCC
Mr. Joe Levin, Wireless Telecommunications Bureau, FCC
Mr. David Siehl, Wireless Telecommunications Bureau, FCC
Ms. Kris Monteith, Wireless Telecommunications Bureau, FCC
Mr. Ari Fitzgerald, Legal Advisor to Chairman Kennard
Mr. Mark Schneider, Senior Legal Advisor to Commissioner Ness
Mr. Bryan Tramont, Legal Advisor to Chairman Furchtgott-Roth
Mr. Peter A. Tenhula, Senior Legal Advisor to Commissioner Powell
Mr. Adam Krinsky, Legal Advisor to Commissioner Tristani