

SUNSHINE PERIOD



Mansfield, PA 16933

February 9, 2000

Commissioner Michael 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:

I am a member of ACUTA, have closely followed the Calling Party Pays ("CPP") rulemaking proceeding, and strongly support the positions expressed in ACUTA's comments.

Mansfield University currently has over 3300 students and 400 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, which can be easily 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. 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 bill the appropriate 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 "frcc" calls can be made to CPP numbers, the cost of which will ultimately be borne by the taxpayers. 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 believe that 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 SAC solution would also save our institution the considerable expense and significantly upgrading or 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. Given the potential 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 A. PHILLIPS
Assistant Director
Information Technology - Client Services

cc: Magalie Roman Salas, Secretary (2)



CONCORDIA UNIVERSITY WISCONSIN

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
Phone:

SUNSHINE PERIOD

Dear Commissioner Powell,

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

Concordia University currently has over 4515 full and part time students and over 400 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 [name of 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



February 10, 2000

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,

A handwritten signature in black ink, appearing to read 'Thomas Phillip', written over a horizontal line.

Thomas Phillip
 Director Of Information Technology
 Direct Phone: (262)243-4487
 Email: Thomas.Phillip@cuw.edu



Washington State University

Information Technology

SUNSHINE PERIOD

Pullman, WA 99164-1222
509-335-0414
FAX 509-335-0540

FAX

TO: Michael K. Powell_____

Phone _____

Fax Phone _____

Date 2/10/00

Number of pages including cover sheet 3

FROM: Dave Ostrom_____
Washington State University
Information Technology
Pullman, WA 99164-1222

E-Mail _____

Phone 509-335-0525_____

Fax Phone 509-335-8616_____

REMARKS: Urgent For your review Reply ASAP Please Comment



Washington State University

Office of the President

PO Box 641048
Pullman, WA 99164-1048
509-335-6666
FAX 509-335-0137

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, Washington State 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 Washington State University to significant financial liability that would undermine our ongoing effort to provide educational services.

Washington State University currently has over 20,000 full and part time students and over 6,200 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

Michael K. Powell

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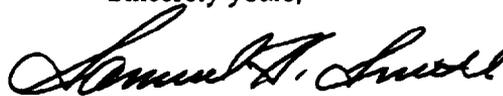
made to CPP numbers, the cost of which will ultimately be borne by Washington State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

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 ("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 campuses, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning 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.

If you have questions about WSU's concerns regarding the proposed implementation of Calling Party Pays, please get in touch with Dave Ostrom, Assistant Director of Communications (ostrom@wsu.edu, 509-335-0504) or Mary Doyle, Director, Information Technology (mdoyle@wsu.edu, 509-335-8616).

Sincerely yours,



Samuel H. Smith
President

cc: Magalie Roman Salas,
Secretary (2 copies for filing in record)
Peter A. Tenhula, Senior Legal Advisor



WEBER STATE UNIVERSITY

OFFICE OF THE PRESIDENT

February 09, 2000

SUNSHINE PERIOD

Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, SW
Washington, DC 20054

Dear Commissioner Powell:

As a member of ACUTA: Association of Telecommunications Professionals in Higher Education, Weber State University has closely followed the Calling Party Pays (CPP) rule making proceeding and strongly supports the positions expressed in ACUTA's comments. We are a non-profit educational institute deeply concerned that without appropriate safeguards CPP will expose Weber State University to significant financial liability that would undermine our on-going effort to provide educational services.

Weber State University has approximately 15,000 students and 2,000 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 PBX's can easily be programmed to block or track call detail for a variety of calls, (0+, 1+, etc.) and calls to pay-per-call services based on 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.

Verbal notification to calling parties is a critical prerequisite to implementation of CPP in a way that protects consumers. However, this kind of notification by itself would not protect our institution from unauthorized CPP calls and we would be unable to bill back. A student or employee can hear the notification, but the institution will never be able to bill the 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 Weber State University. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

PAUL H. THOMPSON, PRESIDENT
WEBER STATE UNIVERSITY
1001 UNIVERSITY CIRCLE
OGDEN UT 84408-1001

(801) 626 6001
(801) 626 8021 FAX
PTHOMPSON@WEBER.EDU

Commissioner Powell

Page -2-
2-10-00

We understand the records before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered 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 (SAC's) to CPP numbers. With effort, and a small cost, our PBX's 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's 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 with uncertain or uncontrollable external costs. Wireless telephones are increasingly popular, thus our concern about 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 tract, CPP calls is undeniable. We feel the provider of wireless services should manage such calls from a PBX by either blocking them or requiring an authorization code.

We feel 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, if CPP is even allowed. We appreciate the opportunity to offer the Commission our views on this matter. If CPP is allowed, we hope the Commission will take into account the needs of all affected parties.

Sincerely,



Paul H. Thompson
President

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

**SUNSHINE PERIOD****ROSE-HULMAN
INSTITUTE OF TECHNOLOGY**

OFFICE OF ADMINISTRATIVE SERVICES

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

Dear Commissioner Powell:

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

Rose-Hulman Institute of Technology currently has over 1619 students and 361 employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls and calls to pay-per-call services (i.e., calls to "900" numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Rose-Hulman Institute of Technology. Even a small percentage of calls made to CPP number would have a direct and immediate impact on our already constrained budget.

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

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

Sincerely,



Dan Wells
Director of Administrative Services

jg

cc: Magalie Roman Salas
Secretary



The University Of

T A M P A

February 10, 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, the University of Tampa 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 Tampa to significant financial liability that would undermine our ongoing effort to provide educational services.

The University of Tampa currently has approximately 3,000 students. With an extensive telecommunications infrastructure accessible to these students, 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 the University Of Tampa. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

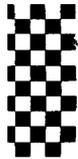
Please bear in mind that the impact on smaller non-profit institutions will in many ways be felt even more severely than in larger institutions. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations 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



Brian S. Sutton
Director of Business Communications



**Office of the
Chief Financial Officer**
e-mail: Art_Gillis@guilford.edu

Fax

SUNSHINE PERIOD

To: Michael K. Powell **From:** ARTHUR L. GILLIS/CHIEF FINANCIAL OFFICER

Company: Federal Communications Comm **Pages (including cover sheet):** 3

Fax: 202-418-2820 **Date:** 2-10-99

Phone: **CC:**

- Urgent**
- For Review**
- Please Comment**
- Please Reply**

• **Remarks:**

Attached please find a letter with regard to Calling Party Pays (CPP).

Jackie Ostasiewski
Office of the VP/Chief Financial Officer



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

Guilford College currently has over twelve hundred students and three hundred 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 Guilford College. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

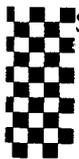
We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and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



Arthur L. Gillis
VP & Chief Financial Officer
e-mail: art_gillis@guilford.edu



INDIANA
WESLEYAN
university

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

Dear Commissioner Powell

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

Indiana Wesleyan University currently has over 1500 students and 350 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.

INDIANA WESLEYAN

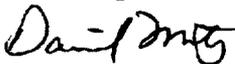
university

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 [name of 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.

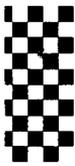
As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated 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,



Daniel Metz
Telecommunications Manager
Indiana Wesleyan University

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



**EAST TENNESSEE STATE UNIVERSITY
OFFICE OF INFORMATION TECHNOLOGY**

SUNSHINE PERIOD

FACSIMILE TRANSMISSION

TO: Commissioner Michael K. Powell

COMPANY: Federal Communications Commission

SUBJECT: Calling Party Pays (CPP)

FAX #: (202) 418-2820

PHONE:

DATE: February 10, 2000 **TIME:** 2:00 P.M.

FROM: Dr. Paul E. Stanton, Jr., President
East Tennessee State University

NUMBER OF PAGES INCLUDING COVER SHEET: 3

MESSAGE:

**IF YOU HAVE ANY QUESTIONS OR HAVE NOT RECEIVED THE PROPER PAGES,
PLEASE CONTACT DEBBIE TEAGUE AT (423) 439-6431.**

**EAST TENNESSEE STATE UNIVERSITY**Office of the President · Box 70734 · Johnson City, Tennessee 37614-0734

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), East Tennessee State University (ETSU) 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 nonprofit educational institution deeply concerned that without appropriate safeguards, CPP will expose ETSU to significant financial liability that would undermine our ongoing effort to provide educational services.

ETSU currently has over 11,200 students and 2,000 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 Office of Information Technology. 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.

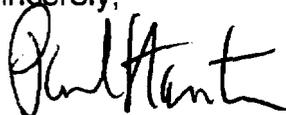
February 10, 2000
Page Two

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 ETSU. 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 nonprofit 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 reallocation 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 E. Stanton, Jr.
President

dt

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

**EAST TENNESSEE STATE UNIVERSITY
OFFICE OF INFORMATION TECHNOLOGY**

SUNSHINE PERIOD

FACSIMILE TRANSMISSION

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

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E A S T T E N N E S S E E S T A T E U N I V E R S I T Y

Office of the President · Box 70734 · Johnson City, Tennessee 37614-0734

February 10, 2000

Commissioner Michael K. Powell
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ETSU currently has over 11,200 students and 2,000 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 Office of Information Technology. 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.

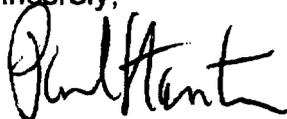
February 10, 2000
Page Two

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As a nonprofit 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 reallocation 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 E. Stanton, Jr.
President

dt

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



Southern Illinois University at Carbondale
Carbondale, Illinois 62901-6724

Telephone Service

SUNSHINE PERIOD

SOUTHERN ILLINOIS UNIVERSITY

DATE: 2/10/00

TIME: 1:15

TO: Commissioner Michael K. Powell

FAX NUMBER: (202) 418-2820

NUMBER OF PAGES (Including This Page): 4

FROM: David Boughl

SIU FAX NUMBER: (618) 453-3000 DESK #: _____

SIU ACCOUNT TO BE BILLED: _____

REMARKS: _____



Southern Illinois University
Carbondale, Illinois 62901-4432

Information Technology - Telephone Service
Mailcode 4432

Phone: 618.453.2484 Fax: 618.453.4000
618.453.3000

February 10, 2000

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

Dear Commissioner Powell:

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

SIUC currently has over 18,951 students and 4,053 employees. With an extensive telecommunications infrastructure accessible to such a large number of students and employees, 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 controlled by the telecommunications department. Our existing Centrex 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 based on the unique numbering schemes associated with these types of calls.

Page Two
Calling Party Pays

For example, when a student places a long distance call from his/her dormitory room, the Centrex recognizes the 8 + 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 Centrex system will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

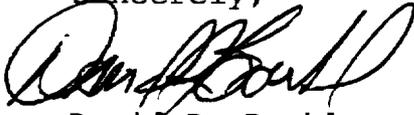
We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the 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 SIUC. 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 Centrex 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 Centrex we have in use with costly next-generation equipment that could distinguish CPP calls without identifiable numbering.

Page Three
Calling Party Pays

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 accomodate 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,



David R. Bouhl
Deputy Director

prw