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5/17/00

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May 17 3 16 PM '00

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May 11, 2000

Chairman William E. Kennard  
 Federal Communications Commission  
 445 12th Street, SW  
 Washington, DC 20554

Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249  
 and 96-45

Dear Chairman Kennard:

I am writing to express my concern regarding one element of the pending CALLS proposal. Specifically, Sabre, objects to that aspect of the CALLS proposal that would retain the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers.

The weighted average MLB PICC found in ILEC tariffs is about \$2.50 per line per month. The MLB PICC levied by major long distance carriers, however, ranges from about \$3.95 to over \$4.30 per line per month. The long distance carriers claim that the PICCs that they charge only recover their costs, even though the mark-up exceeds fifty-five percent. Business users should not be required to bear this dead weight loss any longer.

To avoid the mark-up and the associated dead-weight economic loss, the Ad Hoc Telecommunications Users Committee has asked that the CALLS proposal be amended to include a Multi-Line Business Super SLC. The MLB Super SLC would be an amount equal to the sum of what would have been the MLB SLC and the ILEC billed MLB PICC. This suggestion would not reduce by one penny the subsidy to residential loops, and would have no adverse revenue impact on any signatory to the CALLS plan if their representations about the MLB PICC are truthful. Sabre urges the Commission to grant Ad Hoc's request.

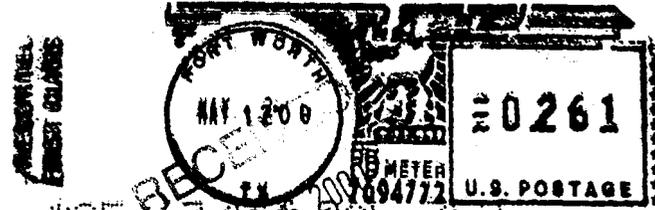
Sincerely,

  
 Terry Somers

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**Sabre**



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