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MAY 23 2000

FCC

May. 17, 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 about a particular aspect of the pending CALLS proposal. Specifically, University of Puget Sound, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. University of Puget Sound does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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, is about \$4.00 per line per month. The long distance carriers claim that the PICCs that they charge only recover their costs, even though their mark-up exceeds fifty-five percent. Business users, including educational institutions, should not be required to bear this dead weight loss any longer.

No. of Copies rec'd 0
List ABCDE

To avoid the mark-up and the associated dead-weight economic loss, the pending CALLS proposal should be amended to include a LEC billed 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 were truthful.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Rodriguez", written over the typed name.

WILFRED R. RODRIGUEZ
Mail and Telecommunications

Cc: Secretary, Federal Communications Commission



The University of
Puget Sound

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May. 17, 2000

Commissioner Susan Ness
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 Commissioner Ness:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, University of Puget Sound, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. UNIVERSITY OF PUGET SOUND does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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, is about \$4.00 per line per month. The long distance carriers claim that the PICCs that they charge only recover their costs, even though their mark-up exceeds fifty-five percent. Business users, including educational institutions, should not be required to bear this dead weight loss any longer.

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To avoid the mark-up and the associated dead-weight economic loss, the pending CALLS proposal should be amended to include a LEC billed 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 were truthful.

Sincerely,



WILFRED R. RODRIGUEZ
Mail and Telecommunications

Cc: Secretary, Federal Communications Commission

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May. 17, 2000

Commissioner Michael K. Powell
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 Commissioner Powell:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, University of Puget Sound, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. University of Puget Sound does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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WILFRED R. RODRIGUEZ
Mail and Telecommunications

Cc: Secretary, Federal Communications Commission

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ACCOUNT # 001

May. 17, 2000

Commissioner Gloria Tristani
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 Commissioner Tristani:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, University of Puget Sound, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. University of Puget Sound does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Sincerely,



WILFRED R. RODRIGUEZ
Mail and Telecommunications

Cc: Secretary, Federal Communications Commission

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May. 17, 2000

Commissioner Harold Furchtgott-Roth
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

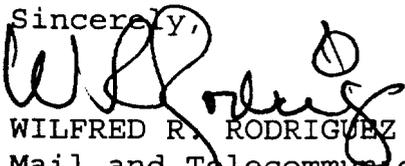
Dear Commissioner Furchtgott-Roth:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, University of Puget Sound, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. University of Puget Sound does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Sincerely,

WILFRED R. RODRIGUEZ
Mail and Telecommunications

Cc: Secretary, Federal Communications Commission