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OFFICE OF THE PRESIDENT

MAY 31 10 50 AM '00

May 24, 2000 OF THE CHAIRMAN

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

RE: 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, the University of North Florida, a public university of over 12,000 students in Jacksonville, Florida (UNF), objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. UNF 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 only recover their costs, even though their mark-up exceeds fifty-five (55%) percent. Public educational institutions like UNF that must rely on shrinking state dollars for support of operations 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 pending CALLS proposal should be amended to include an 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 are truthful.

Sincerely,

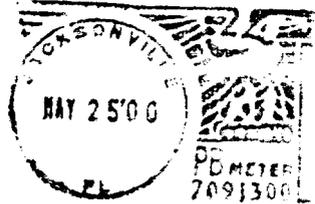
Anne H. Hopkins
President

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cc: Magalie R. Salas, Esq.



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