

NO - 28



Rensselaer

Computing & Information Services
CIS Business Services

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 19, 2000

Honorable William E. Kennard
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Ex Parte 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, Rensselaer Polytechnic Institute, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Rensselaer Polytechnic Institute 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.

To avoid mark-up and the associated dead-weight economic loss, the pending CALLS proposal should be amended to include the LEC billed Multi-Line Business Super SLC. 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 impact on any signatory to the CALLS plan if their representations about the MLB PICC are truthful.

Sincerely,

John Bradley
Director
CIS Business Services/Telecommunications

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