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ACUTA's proposals to exempt colleges and universities from the "aggregator" classification or 10-XXX-0+ access requirements may be released for public comment as early as the first week in March, according to ACUTA's attorney Anne Jones.

Even before ACUTA's petition had been put out for public comment, however, AT&T had already filed a challenge, according to Communications Reports. The Commission has "explicitly addressed and rejected arguments last year that 'dormitory telephones' are exempt from the obligations imposed on telephone 'aggregators,'" AT&T maintained.

Just before the ACUTA News went to press the last week in February, Jones, a partner of Sutherland, Asbill & Brennan, said that "generally the FCC's minimum period for comments on a petition for clarification is 30 days with 15 more days set aside for replies. The agency hopes to expedite the matter, but these proceedings can be unpredictable," Jones cautioned. Requests for extension of the comment period could cause delays.

"The challenge from AT&T may slow down the process," Jones said, "but I'm still confident about our chances for success."

"As soon as we get a decision, notification will go out that day to all ACUTA members via first class mail," ACUTA Executive Director Del Combs said. 

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A new telecom scam — apparently a 900 service masquerading as an 800 number — hit college and university campuses in October but didn't show up on bills until February.

The number, (800) 847-3301, was shut down on Saturday, Feb. 22. The number answered on Feb. 24 with a recorded message saying it was no longer in service. But telecom managers were cautioned that a similar operation could appear using a new number.

Schools in Ohio, Oklahoma, Michigan, North Dakota and Wyoming have found these dubious October charges on their February LEC statements.

Since the FCC has prohibited

Please turn to page 5

Washington U. in St. Louis more than doubles capacity, enhances services

(Edited by Note: This article by Jeff Dunlap is reprinted with permission from Southwestern Bell Corporation's Update magazine.)

Washington University in St. Louis, founded in 1855 to educate a new generation of engineers, scientists, lawyers and business leaders "for the advancing Industrial Age," recently took a new giant step toward the future.

A central ofce-based digital telecommunications switch - activated August 5 - should improve administrative efficiency and streamline staff operations. The Southwestern Bell Plexar system was selected after the university studied different solutions over a three-year-period.

With 12 distinguished colleges and schools, an endowment among the nation's top ten and a 5,000-member faculty that includes Nobel laureates and Pulitzer Prize winners, Washington University is respected internationally for academic leadership and research excellence. Led by Chancellor William H. Danforth, Washington University serves approximately 12,000 full-time students and is ranked among the top 25 universities in the U.S. by the American Council of Education.

Its two large campuses, Hilltop and the medical school, contain more than 120 buildings. Replete with art galleries, restaurants, residence halls, apartments, classrooms, labs, offices and stores, the university functions much like a city of its own. With an annual budget approaching $500 million and 16,000 employees, it has the second-largest payroll in St. Louis. 

(Pl ease turn to page 8)
FCC assigns forfeitures for operator service violations

(Composer's Note: These legal updates are taken from the Telecommunications Legal Reports distributed by the Colorado law firm of Holme, Roberts and Owen. The firm has offices in Denver, Englewood, Boulder, and Colorado Springs, Colorado, as well as Salt Lake City, Utah, and London, England.)

The FCC has conducted a series of enforcement actions against several providers of operator services for violation of the Operator Services Act of 1990.

The Act requires, among other things, that an informational tariff be filed with the FCC specifying the rates, terms, conditions and any fees, commissions of surcharges collected from consumers, and reasonable estimates of the amount of traffic priced at each rate, with respect to calls for which operator services are provided.

The companies against whom the FCC brought enforcement actions failed to file the informational tariffs and, therefore, each was assessed a forfeiture of $52,500 to be paid within 30 days.

The companies notified were:
- Call West; Columbus Telephone Company; Northeast Phone Systems; National Tele-Sav.; Payline Systems; Payphone Systems; S.I. C-T Coin Telephone; Telefona Larga Distancia de Puerto Rico, and World Communications.

Rules Aim to Thwart "Slamming"

In order to provide additional safeguards to consumers against unauthorized interstate long distance service being changed to another company without their permission, the FCC has modified the procedures of changing long distance carriers.

The unauthorized change of a user's long distance carrier is known as "slamming."

The FCC now requires that interexchange carriers (IXCs) who, based on a telemarketing service, inform LECs that they have obtained authorization from a customer to change long distance carriers to first obtain verification from the customer in one of four ways.

- The IXC must obtain the customer's written authorization
- Obtain the customer's electronic authorization by use of an 800 number
- Obtain the customer's oral authorization verified by an independent third party
- Send an information package including a prepaid, returnable postcard, within three days of the customer's request for a change of long distance companies, and wait 14 days before submitting the customer's order to their LECs to give the customer sufficient time to send back the postcard denying or cancelling the change order.

The order also requires IXCs to institute the same verification procedures for customer-owned payphones and for both business and residential solicitations.

New Rules for Inside Wiring Services

In a report and Order dated Nov. 21, 1991, the FCC adopted new policies governing inside wiring services. The policies address the extent of state regulation of inside wiring services so that state regulation will be consistent with the federal policy of "a competitive market for simple inside wiring services."

The FCC preempted state regulation that requires or allows companies to bundle simple inside wiring services with basic telephone services. The FCC will monitor state regulation of prices, terms and conditions of telephone companies' simple inside wiring services. LECs with annual operating revenues exceeding $100 million must file information on state regulation of LEC inside wiring services prices.

The FCC chose not to preempt state regulation of prices, terms and conditions of inside wiring services, and state requirements that telephone companies act as providers of last resort for inside wiring services.

At the federal level, the FCC requires that telephone companies classify inside wiring services as non-regulated activities for federal accounting purposes on a permanent basis. This accounting rule does not preclude states that regulate inside wiring services from assigning all inside wiring costs to intrastate jurisdiction and setting unbundled rates based on those costs.

Association of College and University Telecommunications Administrators – ACUTA NEWS, Volume 21, No. 3

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MESSAGE
FROM
THE PRESIDENT

Paula Loendorf,
University of
North Dakota

FOR SALE: 6 winter coats, 10 sweaters,
6 pair of slacks, all 100 percent wool;
2 pair of snow boots; assorted gloves
and scarves.

Thought I'd take advantage of
the opportunity to use this space
for a free classified advertise-
ment. Since writing last month's
message, I have accepted a new
position, Director of University
Telecommunications at the Univ.
of Arizona in Tucson.

Next to "Good Luck" and "Con-
gratulations," the most frequent
comment I've heard is: "What are
you going to do with all your
winter wool clothes, now that you
won't be living in North Dakota?"

Joking aside, I believe that
winning this opportunity is
partially due to my involvement
with ACUTA for the past six years.

When I first joined the Associa-
tion, I attended events to learn
from the presentations of profes-
sional speakers. I soon realized,
however, that getting to know
other telecom administrators and
being able to share information
and advice on all aspects of
telecommunications was even
more valuable.

Ideas that I gleaned from inter-
action with my peers at ACUTA
events helped me set up the
Telecom Dept. at the Univ. of
North Dakota and then introduce
many valuable programs, includ-
ing Student Long Distance Shar-
ing as well a state-wide inter-
active video network for distance
learning.

Realizing how much I had
gained from membership in
ACUTA, I was persuaded to "give
something back" by serving in
any way I could to assist the
Board of Directors. From this
extra effort, I have gained as
much, probably more than I have
given.

The ACUTA Board consists of
individuals of different back-
grounds, experience and opin-
ions. They come from all parts of
North America, representing both
large and small, public and
private institutions. Working with
them has enabled me to develop
my problem-solving skills and
improve my leadership ability. As
part of this diverse group, I have
learned better how to arrive at
consensus and achieve common
goals. That has been rewarding,
both personally and professionally.

What I have gained from my
ACUTA experience played a role
in my moving to a larger institu-
tion. And I know I will use every-
thing I have learned in ACUTA as
I face the challenges of my new
position.

If this sounds like I'm urging
you to consider a more active role
in ACUTA governance, I am! The
February issue of ACUTA News
contained the Call for Nomina-
tions for Directors in the South-
est (Region 2) and the West
(Region 4). The Call for Nomina-
tions for Officers will appear in
the May issue. If my comments
here have intrigued you, I en-
courage you to make yourself
available for either an officer's or
director's position.

Serving on the Board does
require a considerable commit-
ment of time and effort as well as
the ability to juggle many obliga-
tions. But you get back at least
as much as, usually far more
than, you put into it. And ACUTA
needs committed leaders, if we
are to continue our growth.

In a leadership role with
ACUTA, the reward is not only
service to the Association, but an
opportunity for personal develop-
ment and professional experience
that will enhance your ability as
a telecom administrator.

I started this message with an
advertisement for my winter
clothing, and I'm closing with an
advertisement for ACUTA.

So long. The next column I
write will be from the University
of Arizona!

P.S. My last day in the office
here at the Univ. of North Dakota
will be March 20. My first work-
day in Tucson will be March 30.
Although I may be in climate
shock, you can reach me after
that date, by calling the Telecom
Dept. at the Univ. of Arizona at
(602) 621-5100 or fax (602) 621-
9222. My Bitnet ID will be:
loendorf@arizona.edu.

My office address there will be
Telecommunications, Center for
Computer and Information Tech-
nology, Univ. of Arizona, Com-
puter Center, Tucson, AZ 85721.
Lobbyist, one of Telecom Manager’s several hats

In addition to being a business manager, engineer and accountant, the higher education telecom manager must also function as a lawyer, politician and lobbyist. This is particularly true regarding regulation and legislation governing telecommunications and the effect they can have on our institutions. It’s unreasonable to expect a university administrator unfamiliar with telephone issues to understand the impact of proposed regulatory or legislative actions. To protect the best interests of our respective institutions, it falls to the telecommunications manager to understand that impact and recommend courses of action.

The importance of this can be illustrated by experiences we have had here at Colorado State University.

Prior to 1984, Colorado State was the customer of the local exchange carrier (LEC) for Special School Centrex Services. Students residing in university-owned housing located across a city street from the main campus, had always been the direct customers of the LEC for residential type telephone service.

During construction and excavation to install a university-owned telephone system, cable was placed across the street – with the city’s permission – with the intent of providing telephone service to these students through the university system.

The LEC challenged this move before the Colorado Public Utility Commission (PUC). By extending university-owned cable across a public right-of-way, the LEC claimed, the university was acting as a public utility, which it did not have the right to do.

The university retained a Denver law firm and participated in PUC hearings spread over several months. The results of those hearings were:

- The university can serve the students, and each student will contribute their proportionate share toward recovery of the university’s capital investment in the telephone system.
- LEC services used by the students but billed to the university will be re-billed to the students at cost as originally billed by the LEC. Additional overhead charges may not be added to this rebilling.
- The LEC was directed to maintain a cable and wire distribution system throughout the campus as well as payphones. Non-university affiliated businesses located on campus and private line services originating on campus and terminating elsewhere were reserved for the LEC.

This ruling set the guidelines by which the university telephone system has been managed for the last eight years.

Within eight months however, we were back at it again. The LEC obtained sufficient sponsors to introduce a bill in the Colorado State Senate to deregulate intra-lata services provided by the LEC. The legislation would have applied the rule of "Shared Tenant Services" to university residence halls.

The LEC also sought to achieve the same objectives a month later by filing tariffs with the PUC.

The Shared Tenant Services concept was originally intended to apply to multiple tenant office buildings where-in the owner or developer provides telephone services and network access to all tenants. There was no precedent for applying this rule to students residents of university housing who obtained telephone service from a university owned system.

Were our students Shared Tenant Users? The proposed tariffs called for public network access from a Shared Tenant location to be provided only via measured trunks with measured rates applied to both incoming and outgoing calls from all telephones. Had the tariffs been approved and applied to the university, our local trunking costs would have increased by approximately $100,000 per month.

The legislation failed by one vote in the state senate and was never introduced in the house. Defeating this measure required close coordination with the university’s legislative liaison. I also made several trips to Denver to testify before senate committees.

The same Denver law firm represented both Colorado State University and the University of Colorado before the PUC. We achieved a negotiated settlement stipulating that students pursuing a degree and temporarily resident in university housing are not "Shared Tenant Users" but are part of the university community.

That relationship, so obvious to you and me, was not so apparent to the regulators.

Other higher education institutions in Colorado declined to join us in these efforts, and since the settlement applies only to universities who were a party to the agreement, they remain vulnerable.

I wish I could say this has finally settled, but such is rarely the case in the regulatory arena. During a recent rate case hearing, the PUC received complaints that existing measured-service tariffs were not being fairly and uniformly applied to "high volume users" in Colorado.

Guess who was included among the "high volume users"?

In response to those complaints, the commission reviewed certain services offered by the LEC, including Shared Tenant Services. The PUC has granted the universities permission to intervene in the case, and we'll do so again with the counsel of the same law firm as before.

Future legislative and regulatory action shows signs of becoming even more complex and more likely to entangle higher education. Some states have under consideration regulating college and university telecommunications services much as they do public utilities.

Alabama Public Service Commission has already moved to do this, but is reconsidering the action at the request of a number of universities.

Such regulation could require institutions to draft and file tariffs detailing their rates, charges, polices and procedures for providing telephone services locally as well for intra-lata long distance services. Those tariffs are subject to continual review and update by the regulating body and must be filed any time the institution makes a change.

(Please continue on next page)
800 scam

(Continued from page 1)

Colleges and universities - along with other "aggregators" - from blocking 800 numbers, many ACUTA members are unsure whether the bills they have incurred so far are legal or what they may do to protect themselves from such abuse in the future.

Callers who dialed (800) 847-3301 got a recorded message describing a variety of "ladies" with whom they could converse, if they stayed on the line and pressed the keypad to select an option. The hostess assured callers that billing would be "discreet" and the nature of the call would not be revealed.

Once an option was selected, a "collect" charge was made to the caller's line at $4.95 a minute. When a bill finally arrived, it reflected a "collect" call from "Entertain, Kansas," number (913) 338-1574. (The 913 area code and 338 prefix indicate a Kansas City, Kansas, venue.) A California firm known as Integritel issued the bills to local exchange companies who included them on the monthly statement of the line owner.

Integritel, who said it had no knowledge of the technical procedure used to collect and deliver the billing data, asked for the "toll-free" service to be terminated.

Apparently, the call back - made without termination of the original call - was able to bypass end-office screening.

A firm named Call Transfer Services, which may not necessarily be the ladies' employer, could capture the number of the caller's trunk line and record the length of the call. The call detail was then forwarded to Integritel.

If the call was made from a campus phone system, the institution was the only called party of record. Campus systems with call detail reporting, however, were capable of identifying stations which placed such calls. In one case, the university telecom manager who called ACUTA said: "I just billed the call to the dorm room, and let the roommates decide who would pay."

Some ACUTA members, who have had these "collect" calls show up on their bills, do not have call detail reporting. And even if they do, a school term can come to a close before the four-month lag in billing runs its course. In such cases, the students who made the calls may no longer be enrolled. They may even have graduated or left the country.

Harry Kyle, Telecom Manager at Oklahoma State University, has received assurance from the state's Corporations Commission (which regulates utilities) that the bills are not valid. Kyle has filed formal complaints with the Oklahoma Corporation Commission, the Kansas Utility Commission, the Federal Communications Commission and his LEC. Southwest Bell. Kansas officials also have advised him that the bills are not legal.

One Ohio college, which cannot trace calls to particular stations, reports that Integritel has indeed agreed to give it credit for the call. AT&T College and University Systems (ACUS) was recommending that its clients seek credit from Integritel. Integritel can be reached by calling (800) 736-7500.

US West, the LEC in North Dakota and Wyoming, has been sympathetic to its clients caught in this situation and expressed concern about its own exposure. If such a "collect call" is billed to a LEC-owned payphone, the LEC could face an uncollectable bill.

ACUTA has passed this information along to the Communications Fraud Control Association, which included it on its Feb. 23 Fraud Alert.

At press time for the ACUTA News, a definitive legal assessment of the situation - and who would end up "holding the bag" - was not available. Several members, however, said they would refuse payment until a legal determination is made.

The FCC has informed ACUTA Treasurer Howard Lowell of Colorado State Univ. that it has received several complaints in this case and is reviewing the issues it raises. Anyone wanting to influence the process should send a letter detailing the impact on their business to:

Federal Communications Commission, Enforcement Division, Informal Complaints and Public Inquiries, ATTN: Kathie Kneff, 2025 M St. NW, Suite 6202, Washington, DC 20554.

(Continue from previous page)

At the national level, regulatory requirements forced on higher education institutions are even more threatening. The 10-XXX camel already has his nose in our tent. I hate to sound pessimistic, but it is possible that in the future colleges and universities will be required to provide 10-XXX-1+ and 10-XXX-01+ access to our so-called transient customers, our students. If that happens, call rating and cost allocation problems and their associated costs will increase far beyond reason. We'll be forced to equip and staff to handle all of that or discontinue providing service to students. Neither is an attractive alternative.

What can we do to prevent further erosion of our ability to provide cost-effective services to our institutions, including our students?

First, be very careful of the rates charged to students for local and long distance services. If those rates are abused, the regulators and legislators will be encouraged to take action to "correct" the abuse. Actions taken will apply to all schools within the jurisdiction and not just to the ones with allegedly abusive rates.

Second, major schools - especially those that are state supported - usually have an administrator assigned as the principle liaison with state government. Find out who that is, and make sure they understand your concerns regarding telecommunications legislation.

Their contacts with the state legislature will be able to keep you apprised of proposed telecommunications legislation that you may want to support or oppose. If your school doesn't have such an individual, get acquainted with your local representatives yourself, and ask them to keep you informed.

Third, state utility commissions periodically publish newsletters showing all newly filed and open dockets. Ask your commission secretary to put you on the mailing list for this newsletter. If you elect to intervene in any open proceeding, you may have to obtain the services of an attorney experienced in utility law. Hearings before a regulatory body are quasi-legal in nature with testimony and cross examination being the typical procedure. It can be intimidating for a telecom manager unfamiliar with this environment.

The sooner you get involved the easier it is to have a significant influence on public policy. If we do these things consistently, colleges and universities will be well served with services designed to meet educational needs and provided at minimum costs.
BellSouth offers 10 tips to help avoid disaster

(Editor's Note: These tips are taken from Frontlines, a publication of BellSouth Communications, and are reprinted here with permission.)

A true story.
A brand new hospital. Construction almost completed. A brand-new, large PBX. A conscientious plumber tests a bathtub in a patient room on the third floor. He stops it. Fills the tub with water. And takes out the stopper to make sure it drains okay.
The tub drains just fine. But downstairs a co-worker hadn't yet connected the drain pipe. A quarter-million dollar switch, only days old, went (pardon the expression) down the drain.

It could be a leaking water pipe or a tornado, an earthquake or merely a careless backhoe operator hitting a buried cable. Seldom, if ever, are they expected, but disastrous occurrences that can affect your communications do happen.

Many of the following 10 tips came from the disastrous experiences reported by BellSouth customers. Some customers are including items from these tips in their RFPs. We're sharing them in the hope you can lock the barn door before the horses run away - or the guy upstairs pulls the plug.

Tip #1 One of the most frequent PBX failures occurs because of water from the ceiling. Plumbing and air conditioning are the prime sources, but, like the hospital example, it can be unexpected.

When building a new facility, specify that there should be no air conditioning units or plumbing fixtures above a switch room. Install a metal drip pan over equipment in both new and existing facilities. If there are raised floors in the switch room, install water sensors beneath them.

Tip #2 One telecom manager found that a disgruntled employee had entered the switch room and slashed all the cables with a knife.

There are a variety of options available to control access: a deadbolt lock, keyless locks, intruder alarms - even a fake CCTV camera can discourage unauthorised personnel.

Tip #3 While you're installing alarms, also install a temperature/humidity sensor in the switch room and have it monitored 24 hours a day. More than one switch has been lost or damaged when air conditioning failed on a weekend or holiday in extremely hot weather. If you are drawing up an RFP, include a specification for switchroom monitoring and control.

Tip #4 Of course you have fire protection and power back-up systems, but are they in perfect functioning condition? Make sure that full routine testing is done on the systems. If your fire protection/suppression and back-up power systems have been in place for some time, it would be wise to call in dealers to provide an update on some of the newer technologies, such as pre-action sprinkler systems and cross-zone smoke detectors.

Tip #5 Plan a meeting with your local fire department. At the meeting, make sure that the fire department has all information about your premises that it might require.

For example: Do they know how to gain access to the building? Do they have a list of executives and managers they can call in the event a fire or emergency is reported at your location?

Do they know your physical premises? Where circuit breakers are? Where the back-up power is located. And how to turn it off? Can they find these locations and gain access in a smoke-filled room? Do they want a map posted at the entrance?

And are they aware of special conditions at your premises? For example, types of chemicals that might be stored there?

Tip #6 Like a fire drill in school, emergency preparedness requires a full-scale test and drill of your disaster recovery plan. The time to de-bug it and make necessary changes is in a mock drill, not a disaster situation.

Tip #7 In the event of a disaster in which an entire switch needs replacing, often a small switch (100-line) is found, brought to the location and installed to get basic service restored as quickly as possible.

Some organizations, however, as part of their business continuation planning, determine that they need to make provisions for having service restored more quickly. They have accompanied the purchase of a large PBX with the purchase of a small 100-line unit that they keep nearby as an emergency replacement.

Label the priority lines that would be served by the backup switch.

Tip #8 Redundancy and diversity are basic design elements of private networks, but they are also among new features being offered by local service providers. Some telephone companies, for instance, will provide 50 percent of your lines from one central office and 50 percent from a second central office. In the event disaster befalls a central office or the physical plant connecting your facility, half of your lines are still up.

Other redundant and diverse configurations may be available from your local provider. By taking advantage of these services, you can assure at least some continuation of service should disaster strike the local network.

Tip #9 For customers who do not have dedicated private networks, long distance carriers have responded to the need for disaster recovery solutions by offering network re-routing and other options on their network services. Alternate access providers can also be allies in providing route diversity and redundancy for local service.

Make an appointment to meet with carriers and providers serving your area and get the latest information on your options.

Tip #10 Lastly don't forget that if a major cable problem between the central office and your premises should result in all phone service going out, you won't be able to pick up the phone and call for help. Keep a cellular telephone nearby.
The Federal Communications Commission has initiated a proceeding in which it will determine whether it should begin requiring non-dominant interchange carriers (all those other than AT&T) to file rate tariffs for their interstate service.

The Washington, DC, law firm of Swidler and Berlin is urging its interchange carrier clients to participate in this reconsideration of "one of the most fundamental long distance industry rules" stemming from the FCC's Competitive Carrier proceeding.

"If the FCC modifies or revokes its so-called forbearance policy, some or all non-dominant carriers may be required to file tariffs for their domestic interstate services as they must do for their international services," according to Swidler and Berlin's Andrew Lipman.

"These tariffs would likely be required to disclose all customer-specific rates, terms and conditions offered by non-dominant carriers," Lipman said. "Such requirements would both create additional regulatory compliance costs and reduce the competitive pricing flexibility of non-dominant carriers.

"It is important for such resellers as colleges and universities to note," Lipman continued, "an extension of any rationale to require tariffs of non-dominant interstate carriers could require resellers of intrastate services to file rate tariffs also."

For example, the Alabama Public Service Commission moved last year to bring college and university telephone systems under its jurisdiction, but is reconsidering the action.

The FCC is receiving comments until March 30 with replied comments due on April 29.

In the Notice of Proposed Rulemaking the FCC invites comments on the following specific issues:

- Does the FCC have authority under Sections 4(i) and 203 or other provisions of the Communications Act to continue to permit non-dominant carriers not to file tariffs?
- If the FCC's current forbearance rule is unlawful, does it necessarily follow that non-common carriers must file tariffs? If not, for what classes of carriers is forbearance permissible and for what classes is it impermissible?
- If the FCC's current forbearance rule is unlawful, should carriers be required to file any or all of their off-tariff service arrangements that are currently in effect? If so, in what time frame?
- If the FCC's current forbearance rule is unlawful, would any other FCC rules need to be changed, and if so, how should they be changed? If forbearance is found to be unlawful, should the streamlining rules in Competitive Carrier be relaxed to allow for additional streamlining for carriers currently subject to forbearance? If so, what sort of additional streamlining might be appropriate?

- What would be the implications of any proposed changes in FCC tariffing policies for small IXC's, users and other affected entities? What would be the implications for competition in the marketplace?

By way of background, Lipman explained that "the FCC has initiated this proceeding in response to a longstanding complaint filed by AT&T against MCI."

AT&T charged that MCI is violating Section 203 of the Communications Act by providing interstate common carrier telecommunications services to large business customers at rates and on terms and conditions not set forth in MCI's interstate tariffs. AT&T asserts that the FCC's longstanding forbearance rule - under which non-dominant IXC's are not required to file interstate tariffs with the FCC - is unlawful.

The FCC has denied AT&T's complaint in part, and dismissed it in part, on the grounds that:

(1) MCI should not be liable to AT&T for actions that were fully consistent with FCC rules, and

(2) reconsideration of a fundamental rule such as forbearance should not occur in the context of a complaint proceeding involving two parties.

The rulemaking has been initiated to address AT&T's legal arguments regarding the tariff provisions of the Communications Act in a procedurally appropriate manner.

With respect to AT&T's argument in its complaint that the FCC's forbearance policy conflicts directly with the Communications Act, the FCC notes that "Congress appears to have recognized the operation of the FCC's forbearance rule when it enacted the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA)."

In TOCSIA, Congress amended the Communications Act to require operator service providers which are common carriers, to comply with "informational tariffs" filing requirements which are more lenient than the tariff provisions of Section 203 of the Communications Act.

Congress also explicitly authorized the FCC to discontinue the informational tariff filing requirements after four years in the event the FCC finds that these requirements are no longer necessary. Lipman pointed out. ☛
Plexar more than doubles capacity, enhances service

Continued from page 1

Hilltop Campus, with its Gothic buildings and tree-dotted commons is home to the John M. Olin School of Business, as well as renowned schools of Architecture, Engineering, Fine Arts, Law, Social Work and Technology & Information Management. Brookings Quadrangle, Graham Chapel, the College of Arts and Sciences and 80 other academic, residence and administrative buildings also grace its 169 acres.

More than 80 programs leading to bachelor's, master's and doctoral degrees are offered by the College of Medicine at University Medical Center.

The Plexar system has more than doubled the previous telephone capacity of Hilltop Campus to 7,000 lines. And it provides many customized features that may be modified quickly to better serve faculty and staff needs. Plexar also enables the university to offer cost-effective local and long distance service to more than 5,200 residential students, who benefit from the university's bulk-call and long-distance rate discounts.

F. William Orrick, Director of University Telecommunication Services, observes, "We now have a fully capable, digital telecommunications system that offers increased capacity, a wide range of features and allows us to provide value-added telephone services to students at virtually the same (costs) as before."

The process that culminated in the August cutover started in 1988, when the university began a comprehensive evaluation of its telecommunications needs.

For more than a decade, Hilltop Campus telecommunications had been managed through a PBX switching system, which limited service to 2,500 phone lines for faculty and staff use only. It required three different exchanges and, because of limited capacity, could not serve student residence halls or fraternity houses. (Students contracted for telephone services from Southwestern Bell.) The PBX "was running out of horsepower and beginning to cause problems," says Orrick, who has worked in telecommunications management at the university for 27 years.

"We were starving for more capacity," he says. "And we couldn't add more lines without adding a new switch. Sometimes we experienced delayed dial tones or outages. It was hard to locate spare parts. When we found them, we bought more than we needed in preparation for future breakdowns."

To help research new telecommunications technology, as well as potential costs, the university used a consulting firm to help evaluate different vendor systems. Meetings were held among deans, directors, department heads and other university managers to define needs and concerns. In 1990, a comprehensive request for proposal was developed and distributed to 14 leading vendors.

"We knew we required a single new system or a very convenient, inexpensive method of trunking lines between two separate systems to achieve the results we sought," says Orrick. "Our premise for the RFP was to replace our existing system, expand our line capacity and provide phone services to students without increasing service charges," he says.

"Washington University wanted state-of-the-art systems technology to serve its faculty, staff and all students living on campus," recalls Chuck Bader, the Southwestern Bell account rep who responded to the RFP. "The university also wanted more flexibility to expand its system in the future without any hassle. Reselling line features and long-distance to students as cost-effectively as possible was a big priority. The university wanted maximum value."

Vendor proposals were evaluated by a university executive committee based on what Orrick describes as "power rating factors." In the RFP, each telecommunications feature the university desired for example, call forwarding, which automatically transfers incoming calls to alternative numbers - was given a point value. A total of 80,500 feature points were available. Proposed system and service costs were crucial factors in the equation.

"When it came to selecting the vendor of choice, we wanted to evaluate the total number of points and divide those by the dollars involved to determine the power value," says Orrick. This objective process would enable the university to rate specific features against definitive cost parameters and get an overall picture of the system being proposed. Also, it would help define vendor strengths in key technology and service areas.

The evaluation ended last March when Washington U. signed an agreement with Southwestern Bell Telephone for a customized, digital system and new station equipment from Southwestern Bell Telecom. It is among the largest agreements in Southwestern Bell history. The 10-year agreement provides:

• Comprehensive phone service to enhance telecommunications between Hilltop Campus and various off-campus facilities;
• 5,400 new telephone sets serving faculty, staff and students;
• Consolidation of Hilltop Campus phone numbers from three different exchanges to one exchange;
• Automatic Call Distribution (ACD) systems that monitor the number of incoming calls to campus, generate system reports and provide useful telecommunications management features;
• Automated voice mail services for faculty, staff and students;
• Integrated Services Digital network (ISDN) availability, which will enable the university to transmit both voice and data signals over one line, further increasing telecommunications efficiency, should the need for this technology arise.

The system also serves - via a dedicated line - the university's Tyson Valley Research Center, a wildlife laboratory 26 miles away in Eureka, Mo., and several off-campus buildings, including the Administrative Services Center, where the university switch-board and Orrick's office are located.

Southwestern Bell Telephone installed a new DMS-100 digital Plexar switch one-half mile from the Hilltop Campus to serve the university. This switch may be utilized by other large organizations in suburban St. Louis that want more telecommunications efficiency, Bader points out.

In addition, Southwestern Bell's Building Distribution System (BDS) specialists modified the Hilltop Campus cable and wire system, expanding its capacity by some 20 percent, to facilitate more efficient systems connectivity. As the backbone of Hilltop Campus telecommuni-
Southwestern Bell employees who participated in the project joined Washington University telecom officials to mark the cutover of the new Plexar Centrex system. In front (from left) are Becky Rickman, Chuck Bader and Stephanie Schmidt, all of Southwestern Bell. Ann Hogan, Asst. Manager of Telephone Services at Washington U., and Pat Conis of Southwestern Bell. In back (from left) are Janet Stinchcomb, Charlie Natch and Tim Schaeffer of Southwestern Bell and F. William Orrick, Director of University Telecommunications Services at Washington U.

Communications, the BDS not only serves the phone system but supports building-to-building transmissions between personal computers, select database systems and FAX machines.

Robert J. Benson, University Vice Chancellor for Computing and Communications and Dean of its School of Technology & Information Management, was a member of the committee that evaluated vendor proposals. "Southwestern Bell worked very hard throughout the RFP process to develop the best possible solution for our requirements," Dean Benson says. "After we selected Southwestern Bell, their team worked diligently to ensure that we achieved successful system implementation."

This involved many long hours to ensure the Plexar system was activated before the 1991 fall term began, Dean Benson says, adding, "From the standpoint of activation and implementation, we couldn't be happier."

What specific advantages does this powerful new, central-office-based system and equipment provide? Orrick describes each benefit, beginning with the "positive growth factor."

"First our line capacity is virtually unlimited," Orrick says, noting that the university contracted with Southwestern Bell to serve 10 years of projected system growth. Thanks to Plexar's automatic station expansion and deletion capabilities, "There will be very little financial impact, only a small incremental cost, to add new stations as we need them," he says.

Plexar's multitude of convenient user features also are a plus. These include call forwarding, call waiting, conference calling, speed dialing and many others. Orrick describes these features as "very much of an enhancement." He notes that they don't require additional user equipment and are activated simply by pressing two keyset buttons. (The university now provides automatic one-touch speed dialing and call waiting on student phone lines. Most faculty and staff utilize a full range of features.)

Pointing to the new digital phone in his office, Orrick explains how the "call forward busy" feature transfers incoming calls to a pre-determined location if his line is busy. A call forward-no answer" completes this automatic transfer if a call is unanswered.

"We can use 'call-forward-all' to override both those functions, but neither feature has to be deactivated," Orrick says. "It's just a matter of selecting the feature code we want. We can send incoming calls to a secretary, to voice mail or to another number for response."

The university's planned voice mail system is especially popular with students who were advised in mailings last summer that voice mail would be available for a small, monthly fee. Within weeks, hundreds of students signed up for the service, Orrick says, even though voice mail will not be fully activated until later this year.

"Voice mail can solve an awful lot of telephone tag problems," Orrick points out. "It allows information to be passed back and forth easily, without having to make repeated calls."

"Students initially comprise the largest number of voice mail users we will have," Orrick predicts. "The academic world will use voice mail based on departmental decisions and totally at their discretion," he adds, noting that individual faculty members may contract for voice mail even if his or her department chooses not to.

The new Automatic Call Distribution (ACD) System, analyzes Hilltop Campus call flow and generates comprehensive reports that detail both system and personnel performance.

Orrick, an ACUTA Board member and Past President, relates, "Until now, we had no reliable method of knowing how many incoming calls this campus received or how our operators were responding. Now, we can determine exactly how many calls we get at the main switchboard, the busiest times of day for calls, how long each call lasted and additional information."

"We don't have to record all this information manually," Orrick adds. "It's automatically recorded in the ACD application. Now, we can generate management reports on demand. We access them onscreen or make printouts. It helps us better manage our resources and allocate work flow."

"We're using ACD as a load

(Please turn to back page)
Telecom Resources Manager joins ACUTA staff

The ACUTA staff now includes a Telecommunications Resources Manager to provide telecom support and information to the membership and oversee the Association’s Exhibit, Sponsorship and Corporate Affiliation programs.

Kevin Adkins, who has spent the last four years with GTE’s TestMark Laboratories as an evaluation engineer, joined the ACUTA staff Feb. 17.

‘With Kevin on staff, we hope to expand the services that ACUTA has available to the membership,” Executive Director Del Combs said. “Don’t expect an answer to every question you have immediately, but Kevin will be compiling information and setting up ways of making it more readily accessible to our members.”

After graduating from Morehead State University in 1984, Kevin joined the staff of Central Associated Engineers of Versailles, Kentucky, where he had applied for its electrical distribution arm. Electrical distribution had no openings, however, but telecommunications did.

“I had never heard of ‘tip and ring’ until my interview,” recalls Kevin, “but they didn’t seem surprised.” His working knowledge of telecommunications has come from “on the job training” by “constantly pestering my boss into explaining ‘why things are done the way they are.’”

His main responsibilities with Central Associated included “cradle to grave” project management for small, independently-owned telephone companies who were attempting to modernize their systems to single-party, all-digital service and transmission.

“That experience was invaluable,” says the West Liberty, KY, native, “since my duties included strategic planning, securing project funding, engineering plan design, drafting specifications and issuance of RFP’s, contract negotiations, regulatory filings, installation coordination, quality acceptance and final equipment turnover.”

After three years, Kevin knew he wanted a career in telecommunications. When an opportunity arose to join the Technical Staff of GTE TestMark Laboratories in Lexington, one of the nation’s premier telecommunications product testing units, he jumped at the chance.

“The lab work allowed me to gain more hands-on experience with telecom equipment,” he explains. “The products I evaluated ran from telephone sets to digital switches and everything in between.”

During the last two of his four years at GTE, Kevin earned a master’s degree in Telecommunications Management from Southern Methodist University (SMU) via a corporate-sponsored videotape arrangement.

“SMU has an outstanding program for both the new graduate student and the experienced, working professional. Working full-time, raising a growing family - he and his wife, Tiwana, have three children...”

- and earning this degree was an arduous two year task, but it certainly has been worth the effort.”

Coming to ACUTA was a logical progression for the ambitious, young telecom engineer.

“I had just completed the degree this past December and was pondering ways to translate it into a better career opportunity when I noticed the ACUTA position ad in the Lexington newspaper. It read almost exactly like my newly updated resume. Although I was unfamiliar with ACUTA, I was excited by the potential for contribution with a vibrant and growing organization. Now, with the generous support of my fellow staff members here at the ACUTA office, I have ‘hit the ground running’ in my duties.

“Initially, I will concentrate on membership technical support, vendor liaison, networking database administration and education/training programs. Presently I am planning strategies to implement my goals in these areas.”

“My number one priority is to support the ACUTA membership in direct and tangible ways. Though a significant part of my duties involves vendor interface, the term “Resources” in my title is there for the ACUTA membership; either to provide direct support based on knowledge and experience, or to put members in touch with other sources of assistance.”

Kellie Bowman, who as Staff and Events Coordinator for the past three years has had responsibility for the Exhibit and Corporate Affiliation Programs, is now Membership Services Coordinator. In this new position, she also will help with publications promoting ACUTA events. Lisa M. Cheshire, former Membership Services Coordinator, has moved to the new position of Meeting Planner and will also assist with the work of ACUTA committees.

Profiles of these two staffers, detailing their responsibilities, will appear in the next two issues of ACUTA News. •
Help! We need articles for the ACUTA News!

Do you realize that we have dwindled down to less than one article per month from our members? A couple of years ago, you responded to our plea for articles, and for about six months we actually had a backlog of excellent material.

We again need your support. And if you don't have the time, details or maybe lack the confidence in writing an article, here is where your VENDOR could come into play. On a couple of occasions, vendors have stepped in to assist a member with an article by providing details and photos, etc.

Vendors should also read this column as an invitation to take the initiative and assist your clients/institutions in putting together a story about recent acquisitions, applications, techniques, etc., that involve your products and/or services.

Bill Robinson, ACUTA's Publications Editor, stands ready to provide any information that you (the institution or vendor) may need for writing an article. Bill can be reached by phone at (606) 252-2882 or Fax (606) 252-5673.

ACUTA News is the primary source of ACUTA information for many of our members. It informs your contemporaries of what is taking place in the telecommunications world at other institutions. We need your help to maintain a high quality of informative material.

"Newsy" Information

To promote the "networking" that is ACUTA's trademark and to provide a quick and almost effortless way for members to let others know what you and your institution are involved in, we will initiate a new feature in ACUTA News next month. Hopefully, it will be categorized by regions. This will be a "newsy" section with a very brief description of your current and/or future activities.

We have enclosed a form in this issue to make it more convenient for you to write down some notes and send them to the ACUTA office. Please make a copy of the blank form, before you fill it out and send it in, and keep it in your files to copy for future use. Then simply mail or fax your news sheet to us.

In summary, this year the Strategic Planning Committee has noted that new technology alone will not bring telecommunications to the forefront on your campus. But technology and the innovations it makes possible — managed and promoted by an informed telecom professional — will.

For our profession to achieve campus-wide recognition and be part of the focus for meeting institutional goals and missions, we must keep each other informed and learn how to feed off each other. I know no better way that to author an article for publication detailing your accomplishments for your colleagues.

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From ACUTA Headquarters

Del Combs
Executive Director

ACUTA Calendar

- Workshop - Understanding Telecommunications
  Millersville, PA
  March 30-April 1

- Spring Seminar - Lexington, KY
  April 26-29, 1992
  HOTEL: The Radisson Plaza
  TOPIC: Data Communications

- 21st Annual Conference - San Francisco
  July 26-30, 1992
  HOTEL: The Hilton on Hilton Square
  TOPICS: Management, Regulatory Issues; Professional Growth, Voice, Data and Video, User Groups, Regional Meetings

- Fall Seminar - Hilton Head, SC
  Nov. 1-4, 1992
  HOTEL: Hyatt Regency
  TOPIC: Disaster Planning

- Winter Seminar - Tampa, FL
  Jan. 10-13, 1993
  HOTEL: Hyatt Regency West Shore
  TOPIC: To be announced
Among automatically implemented standards, particularly in colleges and universities across the country.”

Indeed, Washington University - which has five major data bases, more than 2,000 terminals and microcomputers on both campuses - now is evaluating potential use of Plexar’s “Datapath” capabilities. If implemented, “Datapath” high-speed circuits and modem-free operations will enable quicker data transmission and retrieval between diverse locations, further advancing management productivity.

Bader points out, “Washington University’s investment in Plexar supports all the productive telecommunications systems and equipment in use on the Hilltop Campus today, as well as many potential new applications. By consolidating different system tools at Southwestern Bell’s central office, Plexar enables the university to realize important benefits of utility, efficiency and cost-savings.”

One such benefit is the university’s ability to “bundle” its long-distance lines and receive huge discounts from its interchange carrier as a result of high calling volume. “We pass these savings on to the students,” Orrick says.

In addition, Plexar enables Washington University to relocate telephones easily, FAX machines, modems and other equipment simply by plugging them into telephone jacks, eliminating the need for service assistance. And, since Southwestern Bell manages all Plexar equipment and software, the university can avoid having to provide for system maintenance and expenses itself.

These advantages, combined with Plexar’s ISDN capability, provide “A new generation of advanced digital services that will enable us to maintain our growth and enhance our services to students,” Dean Benson says.