



Office of the Ohio Consumers' Counsel

October 27, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

RE: In the Matter of: Nomination for Universal Service Administrative Company Board of Directors, CC Docket Nos. 96-45 and 97-21

[Nomination for representative for low-income consumers]

Dear Ms. Dortch:

I am pleased to nominate Ellis Jacobs, Senior Attorney with Advocates for Basic Legal Equality, Inc. of Dayton, Ohio, for another term as the representative for the nation's low-income consumers on the Board of Directors of the Universal Service Administrative Company ("USAC"). The Federal Communications Commission has invited nominations for this position.¹ A copy of Mr. Jacobs's resume is attached. I hold the appointed position of Ohio Consumers' Counsel, the statutory representative of Ohio's residential utility consumers, for the Office of the Ohio Consumers' Counsel.

Mr. Jacobs brings significant knowledge and experience to the USAC Board of Directors. He has been the representative for low-income consumers on the Board since 2009. During that time, he has been a member of the Board's high cost/low-income committee and has played an active role with regard to the implementation of the many recent changes to high cost and low-income programs.

Mr. Jacobs has had a longtime commitment to representing low-income consumers through his work for Advocates for Basic Legal Equality, Inc., formerly known as the Legal Aid Society of Dayton. Regarding public utility matters, and specifically telecommunications matters, he has been primarily active as the attorney for the Greater Edgemont Community Coalition, a non-profit, charitable organization with an office in a largely African American inner-city neighborhood of Dayton. The Coalition works to expand education and economic opportunities and improve the quality of life for all residents of the neighborhood.

I have known Mr. Jacobs for more than twenty-five years. Mr. Jacobs is knowledgeable, hard-working, accustomed to working with stakeholders, and dedicated to serving the public interest. Based on his work on the USAC Board and his background of service to low-income individuals, Mr. Jacobs would be an excellent choice as the representative of low-income consumers on the Board.

¹ See Public Notice, DA 17-891 (rel. September 13, 2017); 47 C.F.R. §§ 54.703(c); 54.703(b)(10).

Marlene H. Dortch, Secretary
October 27, 2017
Page Two

As universal service transitions beyond traditional telephone service, Mr. Jacobs's experience should be beneficial to both the Board and low-income consumers.

Thank you for this opportunity to nominate Mr. Jacobs to continue serving low-income consumers on the USAC Board.

Sincerely,



Bruce Weston
Ohio Consumers' Counsel
Office of the Ohio Consumers' Counsel

CC: Charles Tyler, Wireline Competition Bureau, FCC
Ellis Jacobs

ELLIS JACOBS
131 E. Davis Street
Yellow Springs, OH 45387
Phone: (937) 535-4419
Fax: (937) 449-8131
Ejacobs@ablelaw.org

BAR ADMISSIONS

Admitted to Ohio and Federal Bars, November 1981

EDUCATION:

University of Dayton School of Law - Dayton, Ohio
J.D. Degree, June 1981
Capital University, UWW - Columbus, Ohio
B.A. 1978

EMPLOYMENT:

ADVOCATES FOR BASIC LEGAL EQUALITY, INC.
Dayton, Ohio
Senior Attorney
(December, 2003 – Present)
Utility Regulation, Environmental Law, Voting Rights.

LEGAL AID SOCIETY OF DAYTON, INC.
Dayton, Ohio
Litigation Director/Chief Counsel/ Managing Attorney
(May 1987 – December, 2003)
Utility Regulation and Environmental Law.

CITY OF DAYTON
Dayton, Ohio
Magistrate
(September 1985 - May 1987)
Presided over the city's landlord/tenant court, heard a variety of
other cases referred by municipal judges.

MONTGOMERY COUNTY PUBLIC DEFENDERS OFFICE
Dayton, Ohio
Senior Appellate Attorney
(November 1983 - September 1985)
Trial Attorney
(November 1981 - November 1983)

MONTGOMERY COUNTY FAIR HOUSING CENTER
Dayton, Ohio
(May 1981 - November 1981)
Civil rights litigation, landlord/tenant law.

UNIVERSITY OF DAYTON SCHOOL OF LAW
Visiting Professor, Law Clinic
Spring 2001, Fall 2003

ANTIOCH UNIVERSITY
Visiting Professor, Business Law
Spring 2001, Fall 2002

SINCLAIR COMMUNITY COLLEGE
Instructor, Business Law
1987

UNITED STATES DEPARTMENT OF COMMERCE
Grant Reviewer, Technology Opportunities Program,
2002

**RELEVANT
EXPERIENCE:**

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
BOARD OF DIRECTORS, (2009- Present) Representative of low
income customers, member high cost/low income committee.

ATLANTIC FELLOWSHIP IN PUBLIC POLICY
Fellow, Office of Telecommunications (OFTEL),
London, England
(August 2001 – January 2002)
As part of a British Government sponsored fellowship program,
worked and studied at OFTEL, the British equivalent of the FCC.
While working on several projects for OFTEL, researched and
wrote, “British Universal Service Policy in the Era of Mobile
Madness”, presented at the Atlantic Fellowship Conference,
London England, May 2002.

TELEPHONE AND TECHNOLOGY ACCESS PROJECT
Director (1995 – 2003)
Provided public interest advocacy for the low-income community
on telecommunication issues. This included representation in
alternative regulation, merger, service quality and prepaid
provider cases and involvement in universal service, local

competition and minimum service standard rules dockets.

OHIO COMMUNITY COMPUTING CENTER NETWORK

Board Member (1995 – 2004)

Chair (1995 – 1998)

The OCCN provides support to a network of computer centers in low income communities throughout Ohio, including centers funded as the result of settlements in the Ameritech and Cincinnati Bell Telephone alternative regulation and merger cases.

UNIVERSAL SERVICE ASSISTANCE ADVISORY COMMITTEE

Board Member (1995 – 2006)

Chair (1996 – 1998)

This committee oversaw the implementation of the low-income lifeline program in the Ameritech-Ohio service territory. In 2004 this group merged into “Lifeline Ohio”.

COMMUNITY TECHNOLOGY FUND OF OHIO

Board Chair (1999 – 2006)

This fund provided grants to help organizations in low-income communities effectively use telecommunications and computer technology. This fund resulted from the settlement of a merger case and was overseen by the Public Utilities Commission of Ohio. It expired in 2006 when it completed oversight of all grants.

SELECTED PUBLICATIONS:

Ellis Jacobs, “Legal Aid’s Role in the Fight for Telecommunications and Computer Access in Low-income Communities,” Clearinghouse Review, Vol. 37, Number 3, August 2003.

Gabrielle Hammond and Ellis Jacobs, “The Future of Technology in Legal Services: A Time for New Advocacy,” Clearinghouse Review, Vol. 37, Number 1-2, May-June 2003.

Ellis Jacobs, “Fighting to Turn the Promise of Universal Telecommunications Technology Service into Reality: The Experience of one Community Organization in Ohio,” Georgetown Journal on Poverty Law and Policy, Vol. VIII, Number 1, Winter 2001.

Ellis Jacobs, Cary Williams, “Telecommunications Policy in Ohio: Interventions to Bridge the Digital Divide,” Quarterly

Bulletin, National Regulatory Research Institute, Vol. 20, Number 3, Fall/Winter 1999.

Ellis Jacobs, "Expanding Low-Income Communities' Access to Telecommunications Technology," Clearinghouse Review, Vol. 29, Number 3, July 1995.

**SELECTED
PRESENTATIONS:**

"First Do No Harm; Representing Community Organizations," National Legal Aid and Defender Association, San Jose, California, July, 2006.

"Systemic Advocacy in the Digital Age," National Legal Aid and Defender Association, Milwaukee, Wisconsin, November 2002.

"British Universal Service Policy in the Era of Mobile Madness", Atlantic Fellowship in Public Policy Conference, London, England, May, 2002.

"Overcoming the Digital Divide," National Legal Aid and Defender Association, Washington DC, November 2000.

"The Digital Divide and Low Income Communities Access to Technology," Ohio State Legal Services, Columbus Ohio, October 2000.

"Universal Service Advocacy," National Legal Aid and Defender Association, Houston, Texas, April 2000.

"Advancing the Public Interest before State Utility Commissions," Community Technology Centers' Network, Boston, Massachusetts, June, 1996.

"Lessons from the World of Telecommunications," National Consumer Law Center, Washington, D.C., February, 1996.

"National and Local Telecommunications Agendas: Advancing the Public Interest in a Changing Environment," Center for Neighborhood Technology, Chicago, Illinois, November, 1995.