

Commission's inclusive approach. The communications services and devices appropriate for each library or school will depend on the community and on the student or library patron. As the Commission has long recognized, Alaska's schools and libraries serve as the heart of rural communities.⁴ The Commission should continue to trust school districts and libraries to adopt the appropriate technologies to serve their patrons and students.

B. The Commission Should Support Students In Remote Areas And Should Not Exclude Rural Alaskans With Minimum Service Standards

While the Commission's general approach to eligibility is well suited to Alaska, its proposal to "exclude[e] from funding dark fiber and the construction of new networks" is misguided.⁵ The Commission should encourage schools to partner with providers on new infrastructure where needed, including new network construction. The Commission's proposal to exclude the construction of new networks will only prevent connectivity from reaching otherwise inaccessible students and library patrons in rural Alaska. The Commission should encourage schools and libraries to do the work to connect their students and patrons, no matter what technologies are required.

Further, the Commission seeks comment on whether it should impose "minimum service standards and data thresholds."⁶ While school districts, libraries, and their service providers across Alaska work hard to provide connectivity to even the hardest to reach areas, a restrictive minimum service standard will do little to encourage connectivity where capacity is already limited. If the Commission chooses to adopt a minimum service standard for this program, it should not adopt a single national standard of 25/3 Mbps as it has proposed and instead tailor its

⁴ *Federal-State Joint Board on Universal Service, Petition of the State of Alaska for Waiver for the Utilization of Schools and Libraries Internet Point-of-Presence in Rural Remote Alaska Villages Where No Local Access Exists and Request for Declaratory Ruling*, CC Docket No. 96-45, Order, 16 FCC Rcd 21511 (2001) (*Alaska Order*).

⁵ Public Notice at 7.

⁶ *Id.* at 7.

requirements to Alaska’s unique environment with a 10/1 Mbps standard.⁷ Students and library patrons in Alaska require connectivity, and the above broadband speeds will be an improvement for those that currently lack any connectivity at home.

C. The Commission Should Adopt A Flexible Definition Of Educational Purpose That Supports Comprehensive At-Home Connectivity For Students, Patrons, and their Families

The Commission asks whether it should require that “equipment and services purchased with funding from the Emergency Connectivity Fund be primarily for educational purposes.”⁸

The Commission proposes to define “educational purposes” as “activities that are integral, immediate, and proximate” to the education of students or the provision of library services.⁹

While no doubt at-home connectivity used for homework and library services, would fall within the Commission’s proposed definition of “educational purpose,” the Commission should not interpret “educational purpose” too narrowly or restrict the use of funded services or devices to educational purposes. Students, library patrons, and their families will no doubt derive educational benefits from connectivity outside of the school day or the specific services offered by a particular library. Rather than look at connectivity as exclusively for homework or accessing library resources, the Commission should support household connectivity that provides access to all Internet resources, including education and library services.

D. The Commission Should Not Extend Filtering Requirements To Off-Campus Connectivity

The Commission seeks comment regarding the applicability of the Children’s Internet Protection Act (CIPA) to devices and services funded through the Emergency Connectivity

⁷ Public Notice at 7-8.

⁸ *Id.* at 9.

⁹ *Id.* at 10.

Fund.¹⁰ While CIPA applies to schools and libraries “having computers with Internet Access,” schools and libraries have often applied the web filtering required by CIPA at the network level. Off-campus devices for providing at-home connectivity such as Wi-Fi routers and modems often lack the hardware and software to implement filtering in a similar manner. Further, filtering at the network level may exclude students and library patrons from using the connectivity provided by the program for general access to internet resources. Rather than adopt CIPA’s requirements wholesale from the E-Rate program, the Commission should require only filtering at the device level, not at the network level.

Conclusion

Alaska Communications encourages the Commission to adopt flexible program rules that support technology-neutral connectivity for students and library patrons.

Respectfully submitted,

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¹⁰ Public Notice at 14.