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FEDERAL COMMUNICATIONS  
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July 8, 1994

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W. Room 814  
Washington, D.C. 20554

RE: Petition for Rulemaking and Petition for Relief in Section 214 Video Dialtone Application Process (DA 94-621)

Dear Mr. Caton:

OMB Watch supports the relief requested by the Center for Media Education, the Consumer Federation of America, the National Association for the Advancement of Colored People, the National Council of La Raza, and the Office of Communication of the United Church of Christ, in their petitions regarding the implementation of video dialtone facilities. We strongly urge the Commission to establish safeguards to prevent the effect of discrimination against poor and minority communities in the provision of telecommunication services, particularly video dialtone. We further strongly urge the Commission to establish uniform application formats and information requirements for video dialtone proposals.

Equitable access for all Americans must be the paramount concern as the Commission considers video dialtone applications. Applicants seeking to construct and operate video dialtone facilities pursuant to Section 214 of the Communications Act of 1934, as amended (47 U.S.C. § 214), must be required to provide video dialtone in racially and economically diverse ranges of communities at each phase of deployment. We urge the Commission to state unequivocally the video dialtone providers are bound by the principles of universal and non-discriminatory service.

Affected communities must have the ability, moreover, to give informed comments about the plans of Section 214 applicants. To this end, the Commission should revise the current application process and require video dialtone providers to provide census tract data for the communities they plan to serve. In this way, the public and the Commission staff can review all proposals to identify any discriminatory practices or effects.

Pure market economics and profit motive can not be allowed to be the sole determinants of new technologies that stand to so fundamentally alter the education, health, work and leisure practices of Americans, nor can we permit these factors to create a situation of information haves and will-get-somedays. This investment must be made in and for all Americans.

Sincerely,



Gary D. Bass  
Executive Director

cc: Reed Hundt, Chairman  
Peggy Reitzel, Paralegal Specialist