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Comments Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	

Re: Notice of Proposed Rulemaking and Order Establishing Joint Board
April 12, 1996

The following comments are opinions and recommendations made to the Commission concerning the above mentioned Docket by the Instructional Telecommunications Council (ITC), an affiliate of the American Association of Community Colleges. The ITC represents nearly 500 community colleges and affiliated agencies and individuals concerned with the use of telecommunications technology for education. The ITC has been in existence since 1978 and has long been an advocate for the use of advanced telecommunications services for the educational community. In fact, the membership of the ITC includes many of the major Telecourse producers, as well as many of the largest users of regional live/interactive educational networks in the U.S.

The ITC applauds the inclusion of consideration for educational telecommunications users in the Telecommunications Act of 1996. For more than a decade, individual school districts and educational organizations have had little coordinated support for accessing advanced telecommunications services at either sufficient capacities or at rates that were affordable. For that reason, we take this opportunity to present before the Commission three issues that we believe are important considerations relative to the current rule making procedure. We thank the Commission in advance for its consideration of these issues.

Issue 1: Supporting Access to Telecommunications Services for Eligible Educational Entities

Several sections of the Telecommunications Act refer to the provision of support mechanisms for educational agencies attempting to gain access to advanced telecommunications services as part of the newer concept of universal service [§254 (h)(1), §254 (c)(3), etc.]. We are particularly concerned about the ability of individual schools and agencies to understand the intricacies of telecommunications policies, capacities, pricing and service availability provided by the variety of telecommunications service providers around the country. We are also concerned about the lack of services in many of the rural sections of the country. Finally, we are concerned about the need for state public utilities commissions (PUC's) to understand the unique needs that educational institutions might have for telecommunications services. Schools are unique in that many of them are utilizing or wish to utilize a blend of interactive telecommunications services that include direct access to Internet services, local and regional LAN and WAN services as well as interactive video communications for the sharing of classrooms, teachers, and curricula. Many educators are not sure of the best way to package these

services when they are available. Most do not know how to specify their service needs when such services are not available.

The first line of advocacy, it seems to us, should be the state PUC. PUC's need to have information about educational needs and utilization of telecommunication services within their state. In some cases, the PUC may wish to advocate for different services, providers, or information for educational telecommunications users than might be available currently. In any event, we believe that it is important that each state PUC understand the issues related to educational telecommunications use.

Recommendation:

The ITC, therefore, recommends the establishment of educational advisory committees for each state public utility commission. These advisory committees would be comprised of representatives of the eligible educational community and would meet as often as necessary to provide the PUC with information relative to the needs, issues and concerns of the educational community relative to telecommunications utilization. Further, each advisory committee would also provide the PUC with policy recommendations as necessary to address these needs, issues and concerns. Membership on each state's PUC educational advisory committee could be made by the governor or state chief educational officer.

Further, the FCC might also wish to consider the establishment of an educational advisory committee at the national level to provide the Commission with recommendations relative to educational telecommunications needs, issues and concerns.

Issue 2: Identification of Eligible Educational Entities

The Telecommunications Act identifies educational entities eligible for pricing discounts as elementary and secondary schools and classrooms, health care providers, and libraries [§254(b)(6)]. The ITC applauds congress for recognizing that these educational entities need preferential pricing structures in order to afford access into the developing advanced telecommunications infrastructure. Certainly, elementary and secondary schools need to utilize advanced technology tools as a methodology to train students in how to succeed in a future business and commerce environment that increasingly relies on advanced technology tools. Also, newer communications technology promises to provide students and faculty with access to more resources and support services. This is essential in an evolving era where our tools of business, commerce and science will change faster than the time it has historically taken to teach these tools. No school can long afford to remain an isolated island of information. Faculty will necessarily need to communicate with other faculty. Students will gain from reaching out to other students, to other cultures, to businesses and civic organizations. In order to accomplish this communications expansion in an effective and meaningful way, schools seek partnerships. We are witnessing schools partnering with other schools, and with higher education, in order to share resources and expertise. We are entering an era where the seams between elementary, secondary and postsecondary education will be seen as artificial. Effective educational outcomes are more important and necessary than a designation of school type or level.

Examples of these types of partnerships are increasingly apparent today. Many, if not most of the community colleges represented by the ITC work closely with secondary schools in the provision of postsecondary enrollment options programs, allowing traditional high school students to gain access to

resources and opportunities traditionally provided only to college students. These programs also serve to provide secondary students with early college credit opportunities and/or advanced or accelerated learning programs. Many of these opportunities are provided by telecommunications and distance learning technologies. Community colleges are also involved in Tech Prep and school-to-work transition programs. Community colleges have played a unique role in developing important relationships with business and industry that serve elementary and secondary schools well in the development of these programs.

It seems to us that it is increasingly difficult and arbitrary to establish a distinction between the provision of educational services based solely on the traditional notion of educational "level." Community colleges, and in fact, all postsecondary institutions should be encouraged to continue the trend of providing increasing services to elementary and secondary schools and the students they serve.

Recommendation:

The ITC recommends that the definition of schools eligible for participation in pricing discounts as set forth in the Telecommunications Act be broadly interpreted to include those recognized postsecondary educational institutions who are providing services to elementary and secondary schools. These services would include the provision of curriculum, teachers, programs, network services, library services and/or administrative services.

Issue 3: Affordable Pricing Structure for Educational Entities

The Telecommunications Act addresses pricing for educational entities by calling for rates that will assure affordable access to, and use of, telecommunications services [§254(h)(1)(B)]. Certainly, for educational telecommunications services to be effective, as has been discussed in these comments, they need to be affordable. It is in the interests of the Country to utilize advanced telecommunications services to help prepare the next generation of the American workforce. This workforce will be required to be technically literate in order to use the new technology-based tools of American business and commerce both for on-the-job applications as well as for continuous life-long learning.

Many schools today, especially in poorer or geographically isolated areas may not have the resources to afford the type of higher capacity telecommunications services that will soon be required for schools. These services include the installation of high capacity Internet direct connections as well as networked interactive video applications. The ITC views this issue as one of public interest. It is in the public interest to assist schools in gaining access to these advanced telecommunications services. Historically, the Commission has set forth strong expectations in the broadcasting field for support of the public interest, even to the extent of setting forth requirements for a certain amount of public affairs and educational programming. Indeed, this discussion continues today. The ITC believes, therefore, that the Commission should also set forth strong expectations for the telecommunications industry to provide substantial support for providing access to advanced telecommunications services for education. We are not advocating that these services be provided free. Free services are often not valued by the customer. However, we are also not advocating that these services be provided only for a minimal discount. We must have a pricing structure that will assure that these services are accessible and affordable if we are to make a substantial impact in their use by educators.

Recommendation:

The ITC recommends that the Commission establish a mandatory discount of **75% off** the prevailing commercial rates for up to and including capacities equal to the **first T-1 service for data** and up to and including capacities equal to the **first T-1 service for video** between all eligible educational sites, including remote learning centers under the control of eligible entities and/or a discount of **75% off** the prevailing commercial rates for up to and including capacities equal to **2 T-1 connections** between locations as described above for a combination of video and data services. **Additional video, data or voice FX services** beyond the above packages will be discounted to **50% off** the prevailing commercial rate or whatever is negotiated with the carrier, whichever is lower. These rates would be applicable for intralata, interlata and interstate services.

By establishing discounts for capacities rather than services, the Commission will allow the educational user to migrate toward different types of services as needs and circumstances warrant.

Closing:

The ITC thanks the Commission for the opportunity to provide comments as part of this rulemaking procedure, and appreciates the consideration given to these comments. Thank you.

Respectfully submitted,

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Examples Why Lower Rates and Broadband Telecommunications Networks are Needed for Distance Education

Educational Opportunities for Adult Learners in Rural Maine

Through the Educational Network of Maine, the University of Maine provides educational opportunities for those geographically isolated from its main campuses. For example, the Network gives the residents of North Haven, an island which is a one-hour ferry ride off the Maine coast, access to approximately 65 live university courses, four technical college courses, four hours daily of courses and teacher training for high schools, interactive meetings, as well as access to the university system's library resources and connection to on-line library catalogs in all 50 states and 12 foreign countries.

Over 3,500 students use the Network to take credit courses each semester and over 25,000 use it for non-credit courses, training programs and meetings. In this rural state the students often live too far from the university's seven campuses, but can easily travel to over 80 receive-sites located at high schools, community colleges, universities and community centers. By using these technological advantages, Maine is able to provide students, workers and adult learners the educational opportunities they can only access through distance learning.

St. Louis Community College Offers Advanced Placement Classes to High School Students

Across the country telecommunications networks have increased interaction among elementary, secondary and post-secondary educational institutions. Missouri high school seniors can take "concurrent enrollment classes" from St. Louis Community College to obtain advanced college placement without having to leave their high school campus. Teachers can also easily target small groups to offer rural students career programs, honors courses and classes for at-risk groups. A vital component of the information infrastructure is the ability of educational institutions to have mechanisms for interconnection -- so they can cut costs through easily sharing classroom activities, library materials, information and other resources.

Alternative Avenues to Education for North Carolina Students

From 1988 to 1992, the North Carolina Department of Community Colleges experienced a 483 percent increase the number of students taking telecourses at their institutions. This trend is echoed across the country. The main reason distance learning students in North Carolina enroll in distance education courses is convenience. Distance learning students are often time- and place-bound. Students who work in shifts, travel a great deal, or whose responsibilities at home or work do not allow time for regular classroom attendance, prefer distance education. Often these students are kept at home by family responsibilities, illness or disability, or they may be confined to hospitals, rehabilitation homes or prisons.

Data from a 1993 study, showed that 51 percent of distance learning students enrolled in the North Carolina Community College system are over age 30, 53 percent are married, 71 percent are female, 52 percent have at least one dependent, 70 percent work between 20-40 hours per week and 66 percent chose to take courses at a distance due to conflicting work or family schedules.

Training Health Professionals with Interactive Video in Rural North Dakota

Telemedicine provides colleges and universities the ability to easily and affordably train health care professionals in remote areas. Through the use of a broadband two-way interactive fiber optic and satellite video network, students in rural North Dakota can earn their bachelor of science degrees in

nursing, social work and medical technology from the University of North Dakota. The university's Interactive Video Network, IVN, currently links 14 teaching facilities throughout the state. Its satellite system, MEDSTAR, reaches students in an additional 32 rural hospitals.

Dena Puskin, from the Office of Rural Health Policy at the U.S. Department of Health and Human Services, stated on May 2, 1994 before the U.S. House of Representatives, "the provision of degree program courses and didactic continuing education through telecommunications has been shown to be an effective tool for both training and recruitment. Rural communities find that distance learning programs have helped them upgrade the skills of existing personnel and attract new personnel. This reduces the cost of travel and increases continuing education opportunities for licensure and accreditation."

Innovative Partnerships can Benefit Education in Rural Communities

William Ray, superintendent of the Glasgow, Kentucky Electric Plant Board, testified before the U.S. Senate on May 11, 1994, that his company's fiber optic system provides cable service to Glasgow's 13,000 residents. When constructing the system the board also wired the public schools to provide a two-way, high-speed digital system to connect every classroom in the city. Ray noted that in response to his utility company's expansion, the local private cable company which previously enjoyed a monopoly lowered its rates by 50 percent.

Ray maintains that for-profit entities either charge inflated prices or do not serve rural areas because the upfront costs are so high. He stated:

> "One of the goals of the administration and Congress is to ensure that the concept of universal service that basic telecommunications services are available to all at an affordable price is preserved in the development of the NII. The administration and Congress have good reasons to express concerns about the possibilities that our citizens may be divided into information 'have's' and 'have-nots.' Telephone companies and cable television systems, while eagerly identifying the prospects of providing new services in fields that were previously denied them, have been almost cavalier in announcing that they will first "wire" those industries and neighborhoods that promise the greatest return on their investment.
>
> For example, Bell Atlantic announced early this year that it will begin offering its advanced, interactive services first to Montgomery County and Northern Virginia. Only after these 'plump pumpkins' have been picked will the company move on to the District of Columbia, Prince George's County, and other less affluent portions of the metropolitan Washington area. One can only wonder if they will ever get around to the small communities and rural areas outside the metropolitan areas that represent 'slim pickings' in terms of revenues per customer and return on investment."