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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Federal-State Joint Board on )  
Universal Service )

CC Docket No. 96-45

**JOINT COMMENTS OF  
PEOPLE FOR THE AMERICAN WAY, ALLIANCE FOR COMMUNITY  
MEDIA, ALLIANCE FOR COMMUNICATIONS DEMOCRACY, BENTON  
FOUNDATION, CENTER FOR MEDIA EDUCATION, LEAGUE OF  
UNITED LATIN AMERICAN CITIZENS, MINORITY MEDIA AND  
TELECOMMUNICATIONS COUNCIL, NATIONAL COUNCIL OF LA RAZA,  
and NATIONAL RAINBOW COALITION**

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## SUMMARY

The decisions to be made in this proceeding have profound implications for the next century. They will set the foundation for citizen participation in democratic processes, the economic marketplace, and social and cultural activities of the information age. In a technological environment in which these services are increasingly essential for information, education, emergency services, and commerce, as well as communications, it is no exaggeration to say that full, equal, and affordable access to a broad range of telecommunications services is a birthright of citizenship.

The Commission and Joint Board must adopt rules which employ the principle that new technologies have become instrumental in promoting First Amendment values. Even more importantly, they must expressly define these policies as guideposts for future actions under the universal service provisions of the 1996 Act.

Technological advances have created new applications, such as telemedicine, data and file transfer, news services, chat rooms, electronic classrooms, and virtual malls, which go far beyond ordinary telephone service. This new conception of telecommunications supplants and enhances traditional views of speech. Citizens without access are citizens without voices and ears - they are unable to engage in these fundamental new forms of speech and new means to participate in society.

Furthermore, for every additional individual who gains access to telecommunications services and advanced services, the benefits are felt not just by that individual, but by society as a whole. Employers, government agencies, public institutions, private businesses, educators, family and friends, and many others benefit from greater accessibility to connected individuals.

Moreover, Congress made plain that the universal service provisions of the 1996 Telecommunications Act do not replace traditional universal service principles. Indeed, every provision of the 1996 Act builds upon these principles to broaden the types of services included and recipients covered.

Congress has taken a momentous first step in expanding the notion of universal service beyond residences to recognize the capacity of institutions, such as schools, libraries, community computing centers, and community media centers, in bringing new services and technologies to all Americans. The Joint Board and the Commission should follow this initiative by adopting an expansive list of services and support mechanisms for schools and libraries, and confirming the important role that all institutions have to play. However, they must make clear that in no way should the institutional availability of a particular service become an excuse for not eventually providing that service to homes.

Finally, only by adopting policies which embrace and build upon the guiding principles enunciated in the 1996 Act can the Commission create a just, comprehensive telecommunications system that will serve *all* Americans well into the next century.

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People for the American Way, Alliance for Community Media, Alliance for Communications Democracy, Benton Foundation, Center for Media Education, League of United Latin American Citizens, Minority Media and Telecommunications Council, National Council of La Raza, and National Rainbow Coalition ("Joint Commenters") respectfully submit these comments in response to the Commission's *Notice of Proposed Rulemaking and Order Establishing Joint Board*, FCC No. 96-93 (released March 8, 1996) ("*NOPR*").

**PRELIMINARY STATEMENT**

With the universal service language of the Telecommunications Act of 1996 ("1996 Act" or "Telecommunications Act"), Congress charted a new course for telecommunications in the 21st century. In following this mandate, the Joint Board and the Commission similarly must establish policies with an eye toward the horizon.

These joint comments address the broad implications of the decisions the Commission and Joint Board will make in this proceeding. These decisions are for the ages: they will set the foundation for citizen participation in democratic processes, the economic marketplace, and

social and cultural activities of the information age. In a technological environment where these services are increasingly essential for information, education, emergency services, and commerce, as well as communications, it is no exaggeration to say that full, equal, and affordable access to a broad range of telecommunications services is a birthright of citizenship.

The commenters therefore urge the Commission and Joint Board to employ these principles in implementing the rules under consideration in this proceeding, and to make plain that these principles should be central to all further consideration of additional rules under these sections of the act. The Commission and Joint Board should adopt policies that acknowledge that new technologies can become instrumental in promoting First Amendment values, and that increased access will benefit society as a whole, as well as the individuals who receive it. These policies embody Congress' mandate in the 1996 Act to build upon traditional universal service principles, not to replace them. Universal service policies should take a broad view of the role of institutions, such as schools, libraries, community computing centers, and community media centers, in bringing new services and technologies to all Americans. And finally they should agree that the guiding principles enunciated in the 1996 Act empower the Commission to create a just, comprehensive telecommunications system that will serve *all* Americans well into the 21st century.

**I. BASIC TELECOMMUNICATIONS SERVICES ARE ESSENTIAL TO ENSURE FULL CITIZEN PARTICIPATION IN SOCIETY.**

New technological advances - and those that are yet to come - will redefine telecommunications service and increase their importance to extend far beyond ordinary telephone service. These technologies bring new modes of exchanging opinions, information, news, and viewpoints; new tools for education and skill development; new methods for conducting research and

commercial activity; and new means of communicating with fellow citizens. This new conception of telecommunications services supplants and enhances traditional views of speech. Those without access to telecommunications services are disenfranchised - they are unable to engage in these fundamental new forms of speech and means to participate in society. Universal service is therefore essential to enabling every American to speak and to participate in society.

One of the most imposing challenges the Commission and Joint Board face is to implement new and advanced technologies to ensure that the competitive environment in which they can thrive will enrich the *marketplace of ideas* in the process. Technological convergence will transform what had heretofore been common carrier or data transmission services into new forms of media for political, civic, artistic, and commercial speech. As these new methods add to, and perhaps even replace, existing means of mass communications, the Commission and Joint Board must address First Amendment concerns not formerly confronted.

New forms of mass communication require new First Amendment applications, but the underlying goals remain the same. The Supreme Court has repeatedly ratified the First Amendment ideal that government should insure the "widest possible dissemination of information from diverse and antagonistic sources." *Associated Press v. United States*, 326 U.S. 1, 20 (1945). It has held that "the people as a whole retain their interest in free speech...and their collective right to have the medium function consistently with the ends and purposes of the First Amendment. *Red Lion Broadcasting v. FCC*, 395 U.S. 367, 389 (1969) As radio moved from ship-to-shore Morse code to modern broadcasting, Congress enacted the 1927 Radio Act, under which the FCC implemented these First Amendment principles as to the new medium. Later - as coaxial cable became the basis of cable television - municipalities, Congress, and the FCC

fostered First Amendment principles through establishing leased access, PEG channels, program origination, must-carry, and other rules adapted to the new and different characteristics of the emerging medium.

This goal should not be an afterthought: it must be central to the new framework. The Commission and the Board should heed Professor Cass Sunstein's reminder that:

Sometimes constitutional doctrine seems to have lost sight of the point of central constitutional commitments. Sometimes the commitment to free speech seems like an abstraction insufficiently...connected with democratic goals, or indeed with any clearly describable set of governing aspirations.

Cass Sunstein, *Words, Conduct, Caste*, 60 U. Chi. L. Rev. 795, 797 (1993).

For every additional individual who gains access to telecommunications services and advanced services, the benefits are felt not just by that individual, but by society as a whole. Employers, government agencies, public institutions, private businesses, educators, nonprofit community outreach institutions, family and friends, and many others benefit from greater accessibility to connected individuals. When individuals use these services for education, research, and development of job skills, it benefits the economy and lessens the burden on government job training and welfare programs.<sup>1</sup> When they use these services to receive news and information, they become more empowered to make informed choices at the polls, contribute to civic discourse, and contribute to the American system of governance. When they use these services to access public safety and health care information and assistance, they can fight crime,

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<sup>1</sup>This is especially important in regards to children. Children without access are likely to fall further behind in education, be unable to compete in a highly competitive job market, and risk sinking into poverty. However, as the Commission is well aware, the number of children living in poverty with little or no access is growing at an alarming rate. See discussion below, page 14.

avert and receive treatment for injuries, and prevent calamity before it occurs. When they are listed in directories and have access to these services, they may be reached by church and community outreach, shelters, and aid institutions.

**II. THE NEW UNIVERSAL SERVICE PROVISIONS OF THE TELECOMMUNICATIONS ACT EXPAND UPON, BUT DO NOT REPLACE, THE COMMISSION'S UNIVERSAL SERVICE GOALS UNDER THE 1934 COMMUNICATIONS ACT.**

Taken as a whole, the 1996 Act expresses the Congressional will to increase access to communications technologies for all citizens. In light of the new kinds of services which can be possible with new, and even as-yet unimagined technologies, and in light of the convergence of mass media and non-mass media delivery technologies and delivery mechanisms, the 1996 Act's universal service provisions embody the idea that citizens have a need for, and entitlement to, a broader level of services. This goes well beyond plain old telephone service ("POTS") to an expanded level of services which the Senate Commerce Committee described as "a cornerstone of the Nation's communications system." S. Rep. No. 104-23, 104th Cong., 1st Sess., at 25 ("S. Rep.").<sup>2</sup>

The Commission has expressed ambiguity concerning the weight it will give to its past experiences in addressing universal service issues. *NOPR* at ¶2. It states that it will be guided by past experience "only to the extent that experience can assist [it] in interpreting and effectuating [its] new statutory mandate." *NOPR* at ¶2. Elsewhere, however, the Commission characterizes the principles of Section 254 as particularizing and supplementing its responsibility under

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<sup>2</sup>Indeed, the current chairman of the Senate Commerce Committee, a key sponsor of the Act, has advocated "subordinating the drive for deregulation and, where necessary, even competition, to the extent that it jeopardizes the realization of universal telecommunications service." Sen. Larry Pressler and Kevin. V. Schieffer, *A Proposal for Universal Telecommunications Service*, 40 Fed. Comm. L.J. 351, 354 n.7 (1988).

the 1934 Communications Act. *NOPR* at ¶3.

The 1996 Act builds upon and expands the long standing principles of promoting telephone service for all Americans. However, to recognize the increased importance of universal service in the new technological environment, the Act makes some significant refinements in its instructions to the Commission. The Act maintains and broadens service obligations because its driving mechanism - substitution of competition for monopoly - can make this possible. And Congress has supplied the FCC with more specific direction than ever before in meeting its universal service goals and increasing the scope of coverage.<sup>3</sup> Thus, the Act does not change the Commission's public interest mandate, but certifies the value of the Commission's traditional universal service goals as part of furthering the public interest.<sup>4</sup> It is important therefore for the Commission to state expressly that precedent adopted over more than 60 years should be retained as a new floor from which the Commission can build.<sup>5</sup>

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<sup>3</sup>Congress announced an intent to go far beyond the "current implicit authority" set forth in the 1934 Act. The 1996 Act announces "clear statutory requirements...intended to provide continued consistency between Federal and State actions to advance universal service, and for greater certainty and competitive neutrality among competing telecommunications providers...." S. Rep. at 25.

<sup>4</sup>Congress has clearly and explicitly tasked the Joint Board and the Commission with *reviewing the existing universal service regulations* and recommending improvements. 1996 Act, §254(a)(1); S. Conf. Rep. No. 104-230, 104th Cong., 2d Sess., at 131 ("Conf. Rep.").

<sup>5</sup>Even in the earliest days of its existence, the Federal Radio Commission found that broadcast licensing decisions were to be made with an eye toward universal service. *See, Statement of August 23, 1928 Relative to the Public Interest, Convenience, or Necessity*, 2 FRC Ann. Rep. 166 (1928). More recently, the Commission has found that encouraging the availability of telephone services at reasonable rates fulfilled the 1934 Communications Act mandate found in the "available...to all" language of Section 151 and the expressed purpose of the act to "promote[s] safety of life and property through the use of wire...communication..." *MTS and WATS Market Structure*, 93 FCC 2d 241, 267 (1983). Additionally, the courts have long recognized universal service goals as "prominen[t]." *NARUC v. FCC*, 737 F.2d 1095, 1107 (D.C.Cir.

Finally, Congress' addition of non-discrimination language to Section 151 is further evidence that it desired to retain traditional universal service concepts.<sup>6</sup> In this bold step, it made explicit what had only been implied before: that the very purpose of the Act had been to promote deployment of telecommunications services *to all*, irrespective of differences in race, religion, national origin, or sex.

### III. THE COMMISSION SHOULD RECOGNIZE THE IMPORTANCE OF INSTITUTIONAL ACCESS TO ADVANCED SERVICES.

The 1996 Act contains the principle that "elementary and secondary schools and classrooms,...and libraries should have access to advanced telecommunications services...." §254(b)(6). Moreover, it includes provisions which require all carriers, upon request, to provide at a discount (1) any services that are within the Commission's definition of universal services, §254(h)(1), and (2) additional special services which the Commission may designate. §254(c)(3). The Commission has asked what functionalities should be supported through universal service mechanisms for these institutions and how to structure and implement such mechanisms. *NOPR* at ¶¶77-88.

With these newly created guidelines, Congress has taken a momentous first step. This is the first instance in which the notion of universal service has been expanded beyond residences to encompass institutional access.

Joint Commenters welcome and applaud this development, and believe that expanding

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1984). They have endorsed application of new technology in achieving the goals of universal service as far as "available and feasible." *US v. Western Electric Co.*, 531 F.Supp. 894, 904 (D.N.J. 1981).

<sup>6</sup>The 1996 Act prohibits "discrimination on the basis of race, color, religion, national origin, or sex." §104.

institutional access presents great possibilities. The Joint Board and the Commission should not only adopt expansive definitions of services and support mechanisms in applying these new guidelines to schools and libraries, but it should recognize the role of all institutions - schools, libraries, community computing centers, and community media centers - in bringing new services and technologies to all Americans. However, Joint Commenters stress that the Commission must make a clear declaration that in no way should the institutional availability of a particular service become an excuse for not providing that service to homes. Moreover, the Commission should state that it will not refrain from adding a service to its universal service definition just because it has traditionally been available in institutions.<sup>7</sup>

Institutional access to advanced telecommunications services will produce several benefits:

- Institutions will serve as a gateway to allow individuals far greater access to these services than they would otherwise receive. At community computing centers and community media centers,<sup>8</sup> in classrooms, and at library terminals, tens or even hundreds of users may gain access to advanced networks for each single connection. For example, computing stations in libraries may offer patrons who could not even afford personal computers their first chance - at little or no cost - to access the world wide web.
- Institutional access is an efficient use of scarce universal service resources -

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<sup>7</sup>This is especially important for services used by America's children. Children who can only access advanced telecommunications services at school could be at a serious disadvantage when compared with those who have access in their homes, where a young child spends most of his or her day. Moreover, functions such as e-mail, teaching aids, and educational games will involve parents in their child's education and can extend and reinforce classwork.

<sup>8</sup>Community media centers, also known as community communications centers, are modeled along the lines of public, educational and government access centers on cable television. See James N. Horwood, *Public, Educational, and Governmental Access on Cable Television: A Model to Assure Reasonable Access to the Information Superhighway for All People in Fulfillment of the First Amendment Guarantee of Free Speech*, 25 Seton Hall L. Rev. 1413 (1995). Such centers not only provide access to communications systems, but also make available to the public facilities, equipment, and training.

mechanisms to promote access for every citizen are less manageable and affordable than promoting access to a discrete number of institutions. This is especially beneficial in encouraging early availability of new technological developments.

- Institutional access is a highly efficient use of telecommunications resources, because one connection may be active throughout the day instead of the few hours that each individual user may desire access.
- Institutions are ideally situated to provide fundamentals training, skills building, information exchanges, and technical support. They could even function as access providers for community networks, and act as a conduit to post community or employment information to advanced networks.
- Institutions may be useful as centers to incubate new technologies. They will enable providers of new advanced services to reach a large number of potential users with a single connection, and will be able to educate their patrons in the use of these technologies.

Therefore, the Joint Commenters urge the Commission and Joint Board to promote institutional access to what can be identified as the next generation of telecommunications services, *i.e.* those services which are likely to become widely available. This will bring about all the benefits mentioned above, and will reduce the risk of selecting technologies which may become obsolete. Moreover, this is an evolving level of services; the Commission can and should periodically revisit its determination of which technologies to include. 1996 Act, §254(c)(2).

#### **IV. THE COMMISSION SHOULD BROADLY CONSTRUE THE UNIVERSAL SERVICE PRINCIPLES OF SECTION 254(B) OF THE TELECOMMUNICATIONS ACT.**

Congress enumerated several "universal service principles" in Section 254 of the 1996 Act, upon which the Commission and the Joint Board "shall base policies for the preservation and advancement of universal service...." §254(b). These are floors upon which to build. To fulfill Congress' mandate to "advance[]" universal service, indeed if these principles are to have any real significance, the Commission and the Joint Board must interpret them expansively.

**A. Quality Services At Just, Reasonable, And Affordable Rates.**

Congress has directed the Commission and the Joint Board to address several principles in formulating the universal service policies. These include, *inter alia*, the directive that "[q]uality services should be available at just, reasonable, and affordable rates." 1996 Act, §254(b)(1). The coalition believes this is perhaps the most important, overarching goal expressed in the section.

In its narrowest, technical sense, the term "quality" signals that the services a carrier provides to underserved populations under these universal service programs should not be inferior, in terms of signal strength, clarity, reliability, or other technical features, to services it offers to other customers. Presumably, at least for some services, carriers would desire to control their costs by reducing this quality, a result the Act explicitly forbids.

But given Congress' intent to foster broad citizen participation and access, see discussion above, page 2, "quality services" must also encompass *quality of service*, including the content as well as the technological characteristics of the service. For example, rural areas often at present do not receive quality service sufficient to enable them to use high speed modems. This affects the content of what they can receive, and may permit text, but not graphical, interconnections to online services and the Internet. The Commission must enable citizens to afford and receive a package of services which fully enables them to participate in society. See discussion above, page 2.

The services the Commission has proposed, *NOPR* at ¶¶18-22, while a good start, are insufficient in several respects. First, the Joint Commenters concur with the Consumer Federation of America and the American Association of Retired Persons that the definition of universal

service should include the right to *use* the public network, and thus should encompass flat rate service. Comments of CFA and AARP, at 9 ("CFA/AARP Comments"). Second, the Commission has omitted other services which are purchased by the majority of subscribers and are a public convenience and necessity, including directory assistance and listings, modern network facilities, internet access availability, call trace, and 900-number blocking service. *See NOPR* at ¶23. "Quality service" must rightly include these functionalities which have become so commonplace.<sup>9</sup>

The term "affordable" refers to the entire range of services encompassed within the Commission's universal service goals. Not only should every service contained within the universal service definition be affordable individually, but the entire package, taken a whole, must be affordable. Initiation fees, connection charges, and monthly service rates must be affordable.

Affordability is a concept which must be income-sensitive and flexible. The Commission should adopt a definition which uses a fixed or progressively increasing percentage of disposable income. This has the advantage of being equitable: citizens with the very lowest income levels are least able to afford telecommunications services. Similarly, some citizens in rural and high-cost areas may not be able to bear much of their higher costs-of-service.

Joint Commenters endorse AARP and CFA in opposing any definition that is based on subscribership levels. CFA/AARP Comments at 6; *See generally NOPR* at ¶4 n. 13. As discussed below, at page 13, telecommunications service is a necessity of life for many individuals, and some households are forced to reduce their consumption of other necessities of life to

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<sup>9</sup>On this point, Joint Commenters concur in the comments of AARP and CFA. CFA/AARP Comments at 9-10.

maintain telephone service. It cannot be said that these households can truly afford telephone service merely because they manage to find the money to subscribe. *See also*, Comments of the Office of Communication of the United Church of Christ, *et al.*, at 6.

Congress' use of the terms "just and reasonable" echoes the language of Section 201(b) of the 1934 Communications Act, 47 USC §201, which the Commission has interpreted to prohibit, *inter alia*, situations where there are very large, unjustified differences in charges for like services. *See, e.g. ITT World Communications, Inc.* 30 FCC 2d 101 (1970). Specifically, the Commission should prohibit carriers from rate discrimination based on geographical regions or income levels. This reading also advances the goal of Section 254's mandate that rural and high cost areas and low income subscribers receive services which are "reasonably comparable" to services provided in urban areas. 1996 Act, §254(b)(3). Moreover, it is congruent with Section 104, which prohibits "discrimination on the basis of race, color, religion, national origin, or sex." 1996 Act, §104.

#### **B. Advanced Telecommunications And Information Services**

Another Congressionally-mandated guiding principle requires the Joint Board and Commission to consider policies that preserve and promote "[a]ccess to advanced telecommunications and information services...." 1996 Act, §254(b)(3). Thus, Congress intended that the range of services progress far beyond traditional POTS. The definition must include enough modern features to be of practical value, but must avoid locking residential customers into technologies that become obsolete in a matter of years. This flexibility is especially important as interactivity turns advanced services, such as electronic voting and distance learning, into tools for citizenship. See discussion above, page 2.

Indeed, the Act does not require the Joint Board and Commission to adopt an immutable definition of specific technologies or services. The Act defines universal service as "an evolving level," a baseline which the Commission should "establish periodically" and for which the Joint Board may recommend modifications from time to time. 1996 Act, §254(c)(1), (2). Joint Commenters endorse join AARP and CFA in calling for the Commission to define a framework for future expansion of its universal service definition. CFA/AARP Comments at 11.

**C. Low Income Consumers And Those In Rural, Insular, And High Cost Areas**

A third guiding principle requires "low-income consumers and those in rural, insular, and high cost areas" to have access to "telecommunications and information services...that are reasonably comparable to...and...at rates that are reasonably comparable to" those in urban areas. 1996 Act, §254(b)(3). This is a critical notion, because these citizens risk inferior services, and/or unreasonable rates, despite the fact that the need for telecommunications and information services is greater among these citizens than the population as a whole.

Indeed, in rural areas, telecommunications and information services are an essential social and economic link to the world.

When information age technology is being used it is often to be used with even greater intensity in rural households than their urban counterparts - reflecting greater incidence of home-based business activity as well as greater need to overcome economic limitations associated with geographic space.

Richard Civile, *The Internet and the Poor*, in *Public Access to the Internet* 175, 191 (Brian Kahin and James Keller eds., 1995). But despite this heightened need for telecommunications services, subscribership among citizens in rural and high-cost areas falls short of the national average.<sup>10</sup>

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<sup>10</sup>One 1993 report found that in communities with populations between 50,000 and 250,000, the percentage of households without telephones was 7.3, compared to a 6 percent national aver-

For low income citizens, lack of telecommunications services creates a barrier to getting timely medical attention, makes it difficult to report other emergencies such as fires or crimes, jeopardizes access to public assistance programs, impedes the ability to find and keep employment,<sup>11</sup> and impedes communications with friends and loved ones. See Ellis Jacobs, *Expanding Low-Income Communities' Access to Telecommunications Technology*, Clearinghouse Review, July 1995, at 271. But lack of service among low income citizens remains a serious problem. While the penetration rate for low income citizens depends on how one defines "low income," it still clearly trails the national average.<sup>12</sup> Moreover, the problems associated with lack of service for low income citizens fall disproportionately on racial and ethnic minorities, groups already facing serious obstacles in today's job market.<sup>13</sup>

Furthermore, the impact on children living in poverty may be especially great. These children have the least access to communications media, and are likely to fall further behind in

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age. Jorge Reina Schement, *Beyond Universal Service*, at 5 (Benton Foundation, 1994) ("Schement"). Among citizens outside any metropolitan statistical area, this figure rises to 9.9 percent. *Id.*

<sup>11</sup>Even though telephone service is essential to finding satisfactory employment, 10.8 percent of unemployed adults lacked home service in November, 1995. Alexander Belinfante, *Telephone Subscribership in the United States*, at 33 (FCC Common Carrier Bur., released Feb. 27, 1996) ("Belinfante").

<sup>12</sup>The percentage of households without telephone service rises precipitously from 6.9 for those with 1995 incomes between \$15,000 and \$19,999; to 12.7 for \$7,500 to \$9,999; to 24.7 for incomes less than \$5,000. Belinfante at 24. Among families receiving food stamps, public assistance, and welfare, the percentage without telephone service is 31, 34.7, and 27.9, respectively. Schement at 3.

<sup>13</sup>Across all three of the income demographics considered above, the percentages of black and hispanic families without telephone service were over twice as great as for white families. Belinfante at 24. For unemployed hispanics, this number was almost 50% greater than for whites; for unemployed blacks, it was more than two times as great. *Id.*

education and skills. Unless effective policies are created soon, America could lose a generation of children who will grow up disconnected from advanced telecommunications services and less able to participate fully in society.

Finally, as already discussed, enabling these disenfranchised citizens to gain access benefits society as a whole. See discussion above, page 4. It creates more individuals who can fully participate in and contribute to society, enables full employment and a healthier economy, and assists in providing education, health care, and emergency services.

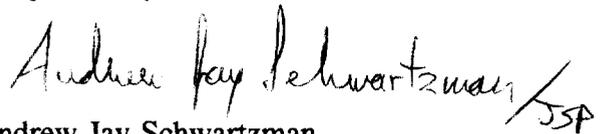
**CONCLUSION**

These universal service principles are central to promotion of First Amendment values and to ensuring that every citizen can fully and equally participate in society. The Congressional mandate specifically includes these goals, and the Commission and Joint Board must effectuate policies which fulfill them.

Respectfully Submitted,



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## CERTIFICATE OF SERVICE

I, Joseph S. Paykel, certify that on this 12th day of April, 1996, I caused copies of the foregoing "Joint Comments" to be served by mail, first class postage prepaid on the parties listed in pages 66 to 70 in the Notice of Proposed Rulemaking, In the Matter of Federal State Joint Board on Universal Service, FCC No. 96-93. I further certify that I submitted a diskette containing the "Joint Comments" as required on page 62 of that Notice.

  
\_\_\_\_\_  
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