

receive telephone calls over the public switched network.⁵⁵ The definition also includes touchtone service, single party service, and access to emergency 911 and operator services.⁵⁶ As a comprehensive universal service model, this proposal is flawed because it assumes access to a residential telephone. However, as discussed above, homeless persons have no residence and migrant farmworkers are away from their residences for a substantial portion of each year. Therefore, the FCC's proposed definition will not result in universal services for these two groups. Because the Telecommunications Act requires the FCC to provide universal service to all Americans, the FCC must adopt rules that provide basic interexchange and advanced telecommunications services to homeless persons and migrant farmworkers in a way that is meaningful to them.⁵⁷

Because Commenters have not had sufficient time to fully identify and discuss all of the possible challenges and solutions in ensuring universal service for migrant farmworkers and homeless persons, we make some initial suggestions to serve as the foundation of any comprehensive universal service package.

First, the FCC should provide support for voice mail for persons who lack the means to regularly receive incoming calls. Second, the FCC should extend subsidies to non-profit service providers, such as schools and shelters, that serve homeless persons and migrant farmworkers to increase their ability to install

⁵⁵ Notice, at ¶ 16.

⁵⁶ Notice, at ¶ 16.

⁵⁷ Telecommunications Act § 254(b)(3).

multiple phone lines, to acquire multiple services, to make toll-free numbers available, and to obtain access to the internet. Third, the FCC should take steps to increase the availability of urban and rural emergency and public payphones. Finally, the LinkUp program should be amended to provide assistance for more than one initiation of service per year.

In addition, the FCC should also require telecommunications and other service providers to make consumers aware of available programs once they are implemented. These subsidy programs are for naught if the groups do not know about them. The FCC should require service providers to widely distribute literature in various languages, run public service announcements on television and radio and use other means to disseminate information about available service and subsidies. The Joint Board must also adopt a means to collect information regarding the success of these initiatives once adopted. All of these steps are needed to ensure that migrant farmworkers and homeless persons have meaningful access to telecommunications service.

Conclusion

In conclusion, the Commenters urge the FCC to ensure that universal service is provided to all Americans by taking into account the special needs and circumstances of homeless persons and migrant farmworkers while adopting its rules on universal service. Because access to traditional universal service presumes a residence, and these groups do not have a residence for all or part of the year, the definition of universal service must be expanded to include these

groups.

Respectfully submitted,



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April 12, 1996

APPENDIX

Descriptions of Organizations and Constituencies

THE UNITED STATES CATHOLIC CONFERENCE

The United States Catholic Conference (USCC) is a nonprofit corporation organized under the laws of the District of Columbia whose members are the active Catholic Bishops of the United States. The USCC advocates and promotes the pastoral teachings of the Bishops in such diverse areas as education, family life, health care, social welfare, immigration, civil rights, the economy, housing, and communications.

THE NATIONAL COALITION FOR THE HOMELESS

The National Coalition for the Homeless (NCH) is a national advocacy network of homeless persons, activists, service providers, and others committed to the goal of ending homelessness. NCH takes as a first principle of practice that homeless and formerly homeless persons must be actively involved in all levels of the effort. NCH is committed to creating the systemic and attitudinal changes necessary to end homelessness. At the same time, they work to meet the urgent needs of persons who either are homeless or at risk of becoming homeless.

WASHINGTON LEGAL CLINIC FOR THE HOMELESS

The Washington Legal Clinic for the Homeless (WLCH) is committed to making justice a reality for all people. Since its founding in 1986 by the D.C. Bar Ad Hoc Committee on the Homeless, WLCH has endeavored to meet the legal needs of children, women and men who are homeless or at-risk of becoming so, assuring access to a system too often inaccessible to those without ability to pay.

Our mission may be summed up in two words: Service and Solutions. We dedicate ourselves to providing quality, free legal services to our clients. Although the Legal Clinic staff is small, our network of more than 200 volunteers from the D.C. legal community enables us to handle over 1200 individual client matters each year. Our volunteers visit ten area shelters, soup kitchens and day centers to see clients at the Legal Clinic's intake sites.

The types of matters our volunteers handle are as varied as the volunteers themselves, who join us from sixty local law firms, numerous government offices and even retirement. Volunteers assist clients in a wide range of cases, including

benefits denials, employment rights, consumer matters, shelter conditions, discrimination, and veterans's issues.

In addition, we seek permanent solutions to the challenges which our clients face. Our law reform efforts and systemic advocacy focus on improving existing programs and benefits, as well as on expanding opportunities available to our neighbors who have no homes. Working with law firms who serve as lead counsel on a pro bono basis, the Legal Clinic has been involved in class action lawsuits challenging the operations of the local family shelter program; the administration of the food stamp program; the mismanagement in public housing; and cuts in various benefit programs.

We also work in coalition with a number of other legal and social service providers, to assure that the interests of our clients are represented effectively. The work of the Legal Clinic has received national recognition and honor in 1993, the Legal Clinic received a "President's Volunteer Action Award" Citation from President Clinton; in 1987, the D.C. Bar received the prestigious Harrison Tweed Award from the American Bar Association for its work in establishing the Legal Clinic.

AMERICAN WOMEN'S ROUNDTABLE

The American Women's Roundtable (AWR) is a non-profit organization with offices in Seattle and Eau Claire, Wisconsin. Initiated by the National Women's Conference Committee, (a mandated "network of networks") and built on existing advocacy coalitions, this *cross-agency, cross-organizational clearinghouse* connects members of the 116 national women's organizations, and 3,400,000 women represented on the national Council of Presidents.

AWR's central tenet is the implementation of a healthy, interactive media model which will demonstrate direct dialogue with government and a point of access and synergy for diverse women and girls, policymakers, local organizers, activists, and educators. National video conferences will downlink to community college women's centers, churches, and United Artist theaters to air critical issues, put forward viable solutions and educate women toward participation in the democratic process.

COMMUNITY TECHNOLOGY INSTITUTE

The Community Technology Institute (CTI) is a national nonprofit organization whose mission is to further the use of telecommunications and other innovative technologies, including the replication of Community Voice Mail around the world, to assist poor and homeless people and the human services delivery system. CTI designs urban and regional application of Community Voice Mail and donates equipment for leading American manufacturers of voice processing systems that

they have customized for human service application.

Community Voice Mail (CVM) is an internationally recognized transfer of technology that enables homeless and phoneless poor people to have timely contact with potential employers, landlords, human services and family. Community Voice Mail is the first personalized, dignified and bilingual use of voice mail from an end user's perspective in this country. It is a collaborative network, widely accessible across a community, ethical and dignified in its implementation, and makes cost-effective use of available technology. CVM mimics a home answering machine for thousands of people; within minutes on a touch-tone phone, individuals all over a community can use CVM with their own 7-digit number, a personal greeting, and private pass code to retrieve message. To date, Community Voice Mail is available in Salem and Portland, OR, San Jose and San Diego, CA, Phoenix, AZ, Minneapolis-St. Paul, MN, Raleigh, NC, Madison, WI, Waltham, MA, Schenectady and New York City, NY, and Aberdeen and Seattle, Wa. Eight more cities from Houston to Boston will start CVM during this year.

CONSUMER ACTION

Consumer Action is a 25-year-old, non profit membership organization that focuses on the telecommunications needs of low income and limited-English speaking consumers. Each year we distribute more than one million copies of free educational materials in five languages, through a national network of 2,200 community groups and social service agencies. Many of these groups serve farm workers and the homeless.

Consumer Action has participated in a number of proceedings before the Federal Communications Commission. Most recently we submitted briefs in FCC No.95-281 (Amendment of the Commission's Rules and Policies to Increase Subscribership and Usage of the Public Switched Network) on behalf of ourselves and 58 groups and individuals from around the country that serve the needs of low income families.

FARMWORKER JUSTICE FUND

The Farmworker Justice Fund (FJF) is a nonprofit organization that engages in advocacy and litigation to improve the living and working conditions of migrant and seasonal farmworkers. FJF focuses on wages and working conditions, immigration issues, women's issues, and occupational safety and health with an emphasis on pesticides. Founded in 1981, FJF is based in Washington D.C. but works with farmworkers and other organizations throughout the country.

FIFTH STREET CONNECTION

5th Street Connection is a program of the Southeastern Mental Health Center (SMHC), a private, non profit, community mental health center servicing four counties in southeastern South Dakota since 1952. SMHC provides services to individuals through the 5th Street Connection Summit Counseling Center, and the Childrens Center. The mission of Southeastern Mental Health Center is to provide quality, comprehensive, consumer sensitive services that promote the emotional and behavioral well being of children, adults and families within our communities by utilizing available resources.

5th Street Connection has been providing services to adults with a severe and persistent mental illness since 1979 and currently serves 450 clients. A broad spectrum of services is provided through the use of multi-disciplinary teams and include homeless, vocational, targeted case management, outreach, clubhouse, medication management, psychiatric, residential, semi-supervised apartments, educational groups and family programs.

HEARTLAND ALLIANCE FOR HUMAN NEEDS & HUMAN RIGHTS

The Heartland Alliance is a broad-based service and leadership partnership comprised of Chicago Health Outreach, TIA/Chicago Connections and the Century Place Development Corp. Our constituency is the very poor, the displaced, and the marginalized with priority services directed towards the homeless, immigrants and refugees, and other mobile population groups.

Our mission is to facilitate the full and fair societal participation of people isolated through poverty and displacement by working with individuals, families, groups and communities to meet basic needs, build strengths, safeguard rights and foster productive interdependence through comprehensive services, policy recommendations, and advocacy -- thereby promoting long term solutions and systemic change.

INTERSTATE MIGRANT EDUCATION COUNCIL

The Interstate Migrant Education Council is a free-standing organization that uses individuals of prominence to examine policy issues related to coordination among agencies, levels of government, and the private sector to enhance educational opportunity for migrant students. The membership of IMEC includes members of Congress, state legislators, members of state boards of education, key state education agency personnel, and local school district representatives.

One of IMEC's priorities has been to develop broad-based understanding among education, government and business decision makers of the unique needs of the

migrant student population. Through a series of publications, ranging from comprehensive research reports to policy briefs and periodicals, IMEC keeps opinion leaders, legislators and education officials apprised of important developments affecting migrant education. A 1987 report of a major IMEC research effort was published in Migrant Education: A Consolidated View and has been recognized by libraries and research centers as a comprehensive document on the status of migrant education.

CLEVELAND PUBLIC SCHOOLS AND PROJECT ACT

The Cleveland Public Schools' Action for Children and Youth in Transition project (Project ACT) provides direct instructional and support services to children and youth residing in temporary or transitional shelters. A comprehensive, holistic approach is used to deliver the direct instructional and support services necessary to facilitate the homeless child's transition into school and to ensure the child's success and ongoing participation in the educational system.

Support services include all that is necessary to accomplish the goal of meeting physical, social and emotional needs and empowering parents to support their children in this endeavor. Project ACT provides a 24-hour helpline for shelter providers with instant access to the Cleveland Public Schools, Department of Student Assignments, to register students, obtain school assignments and transportation services for homeless children and youth. The Project also provides voice mail for staff, students, parents, and teachers to communicate with one another via an 800 access line.

MIGRANT LEGAL ACTION PROGRAM

The Migrant Legal Action Program (MLAP) is a national advocacy center which works with indigent migrant and seasonal farmworkers nationwide. MLAP has as its goal the improvement of living and working conditions for this group of hardworking people. The program works with a network of legal services offices, grassroots farmworker organizations, and other nonprofit groups to better the lives of farmworker families.

NATIONAL ASSOCIATION OF MIGRANT EDUCATORS

The National Association of Migrant Educators (NAME) is in the process of changing its official name to National Association for Migrant Education. The acronym remains NAME, and the basic purposes are unchanged.

NAME is the only nationwide grassroots organization of educators, support personnel and others concerned with the education of migratory farmworker

children. Originally founded in 1989, NAME has about 1,000 members and is staffed entirely by volunteers. Its purpose is to improve educational opportunities for migrant children. It has published informational pamphlets, position papers and other documents.

NAME played a significant role in the reauthorization of the Migrant Education Program in 1994, and has joined the Hispanic Education Coalition in support of continuing the threatened HEP and CAMP programs that serve migrant farmworkers. NAME has actively supported efforts to improve access to technology for migrant children, most recently in the 1995 publication *Giving Migrant Children an Opportunity to Learn*.

VERMONT MIGRANT EDUCATION PROGRAM

The Vermont Migrant Education Program is a federally funded title I program that serves children of agricultural workers who have moved to obtain temporary or seasonal employment in agriculture. This may include children whose family members work on dairy farms or in logging. Due to this movement, children often experience a myriad of educational and social problems.

The Migrant Education Program provides supplemental services to help these mobile students succeed in the regular school program. This is accomplished by program staff working directly with students and their parents in cooperation with local schools and agencies.

CERTIFICATE OF SERVICE

I, Angela J. Campbell hereby certify that I have this 12th day of April, 1996, mailed by first class United States mail, postage prepaid, copies of the foregoing Comments of the United States Catholic Conference et al. in the matter of "Federal-State Joint Board on Universal Service," CC Docket No. 96-45 to the following:

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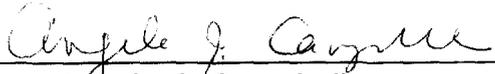
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