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Comments on FCC 96-93 In the Matter of Federal-State Joint Board on Universal Service (CC Docket No. 96-45) NOTICE OF PROPOSED RULEMAKING AND ORDER ESTABLISHING JOINT BOARD

The Alliance for Distance Education in California (ADEC) is a nonprofit organization which supports the effective use of distance education in California. ADEC membership includes administrators, researchers, legislators, and education practitioners from kindergarten through higher education who all share a common interest in the application of technology in education. In order to equitably educate all citizens of California, ADEC supports the expansion of the concept of telecommunications universal service to include both basic and advanced telecommunications services to educational systems, health care providers, and libraries. Therefore, as president of ADEC, I submit this original and 11 copies of ADEC's comments on the Commission's proposed rulemaking to implement the universal service directives of the Telecommunications Act of 1996.

Universal Service Support Mechanisms for Schools and Libraries—

In order to minimize the complexity and cost of developing formulas for a discount methodology for universal service support for schools and libraries, the Commission could use the same factors as are currently used for low income consumers and those which may be proposed in response to the rulemaking's **Section III** on Support for Rural, Insular, and High-Cost Areas and Low-Income Consumers. Each library's or kindergarten through 12th grade school's classrooms, laboratories, media centers, and computer centers could be equated to a low-income consumer unit and eligible for telecommunications services at an amount equal to 10 percent below the lowest rates offered by a telecommunications service provider to its lifeline customers or 20 percent below the lowest contract rates offered to corporations or institutions for a particular service, whichever rate is lower.

Universal Service Support Mechanisms for Health Care Providers—

The purpose of the health care provider which serves rural areas receiving comparable rates to those charged in urban areas appears to be the equitable provision of health care services and instruction to all areas of a state. Therefore, a health care provider should be able to self certify that it is providing rural health care and instruction by listing the rural areas so served in its application to a telecommunications service provider for health care rates. Health care rates should be an amount equal to the lowest lifeline customer's rate or the lowest contract rate paid by corporations or institutions in the state for the telecommunications service being requested by the health care provider, whichever is lower.

Eligibility for School, Library or Health Care Rates—

As stated in paragraph 72 of the rulemaking, the users of these discounted telecommunications services are to include students participating "in educational activities

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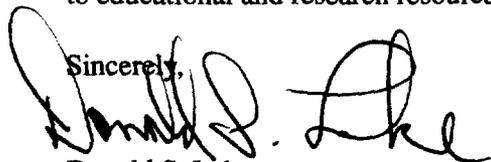
at other schools, including universities” and to “allow students, teachers, librarians, and rural health care providers to consult with colleagues or experts at other institutions” and to transmit telemedicine data. Therefore, it is important that colleges and universities which have cooperative programs with K-12 schools and libraries or which provide rural health care and health sciences instruction should also be eligible to utilize these school, library, and health care telecommunications services rates.

Contributors to Universal Service Fund—

Because it is important to not advantage or disadvantage a particular type of telecommunications carrier which provides interstate telecommunications services, all commercial telecommunications service providers which operate in more than one state should contribute to the Universal Service Fund, whether their means of service transmission is satellite or terrestrial or whether it is wired or wireless. These same companies should also be able to increase their income by providing telecommunications services to schools, libraries, and health care providers which without the Universal Service rates would be unable to afford such services.

Conclusion—

As an organization whose members are involved in providing distance education in California, ADEC supports the rapid implementation of Universal Service rates for educators, libraries, and health care providers in order to expedite the availability of all levels of telecommunications services to link students to educational and research resources no matter where those students are located.

Sincerely,


Donald S. Lake
President
Alliance for Distance Education in California

DSL/WB:aj

cc: Federal-State Joint Board
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