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THE LINCT COALITION

Learning and Information Networks for Community Telecomputing

A Not-for-profit, Nationwide Coalition • Boston Office



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Before the
Federal Communications Commission
Washington, D.C. 20554

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Member
Organizations:

EPIE Institute
Hampton Bays, NY

Ctr. for Information,
Tech. and Society
Melrose, MA

Non-Profit
Computing Inc.
New York, NY

Time Dollar Network
Washington, D.C.

Inter-Serve
Alevandria, VA

The National Trust
For the Development
of African
American Men
Adelphi, MD

In the Matter of)

Federal-State Joint Board on
Universal Service [FCC 96-93]

) CC Docket No. 96-45

To: The Federal-State Joint Board on Universal Service

COMMENTS OF THE LEARNING AND INFORMATION NETWORKS FOR COMMUNITY TELECOMPUTING [LINCT] COALITION

The Learning and Information Networks for Community Telecomputing [LINCT] Coalition requests that the Federal-State Joint Board on Universal Service adopt rules pursuant to their Notice of Proposed Rulemaking on Universal Service that will provide insightful guidance for both federal and state policies, recognizing that many of the state will examine the Board's position in determining their own positions.

In particular, the Coalition wishes to note for the record that decisions made by the Board will set the tone for Universal Service for

"Helping communities achieve electronic equity via local, not-for-profit telecomputing cooperatives"

Affiliated Organizations: American Association for the Advancement of Science/Science Linkages in the Community Project (SLIC) • The National Urban League • The Hispanic Federation • The New York Public Library • The United Neighborhood Houses of NY • regional organizations and local community telecomputing cooperatives nationwide

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several decades, at least. In this regard, we ask that the board carefully consider the scope of their decisions especially concerning the "operation of the market," the definition of advanced services, and the treatment of low-income families.

The Coalition wishes to encourage the board to recognize this point in history as critical to the future of what will be considered universal for education and health, and what services are within the "public interest."

Hereinafter, the Coalition comments on specific questions raised by the Commission in its NPRM and are intended to address how these concerns might be better addressed.

Question 9:

The Board raises the question regarding guidance in the Telecommunications Act of 1996 (hereafter referred to as the Act) and four "goals."

It is the Coalition's position that all four goals need not be met -- that the goals are suggestive but not mandatory.

In particular, the Coalition encourages the Board to consider the scope of Universal Service as going beyond the role of the "operation of the market." Indeed, the provision of Universal Service is to remedy "market failure." Thus, instruction from the market will only provide guidance for market failures regarding "distributional equity" (fairness) and will not provide guidance regarding "advanced services" that may be useful to a society, universally.

At a recent workshop held by the Canadian Government (University of Toronto, March 14-16) it was noted that Universal Services are better thought in terms of "basic services" and "essential services."

The following were submitted as "basic services":

- installation/connection of services, including at least one working jack
- repair service
- free usage within a local calling area, which includes all major public services within the subscriber's geographic community
- access to long distance
- individual line service

- touch tone service (and any other non-optional features) directory listing
- "reference of call" service where number changes, within local area
- printed directory for local calling area (updated annually)
- local directory assistance for new listings
- access to local and long distance directory assistance
- access to operator services
- access to emergency service (911)
- access to optional features
- privacy features including blocking of Caller ID, use of Call Trace and unlisted service

Source: p. 3-4 in Joint submission by The federation Nationale des Associations de Consommateurs du Quebec, the National Anti-Poverty Organization, and One Voice - The Canadian Seniors' Network. In the Matter of: Telecom Public Notices CRTC 95-49 and 95-56, Local Service Pricing Options, February 19, 1996.

Having attended this workshop the Coalition believes that our U.S. process can benefit from insights gained in Toronto. In particular, we note that in an electronic age there are many new services that go well beyond "POTS" and related basic services.

Indeed, it is the challenge put forth to the Board to generate policies that embrace new, essential services (as also address under Q. 66 on the evolution of such services).

We urge the Board to formulate the kinds of services that might be expected under this new class of Universal Service. The Coalition suggests the following types of "essential services":

- Access to records and databases central to the health and education of the public and individuals (with proper safeguards for privacy)
- Access to new forms of community communication -- be it via "web conferencing," telephone response systems between homes and schools, or whatever community *invention* occurs
- Development of telecommunications that provide greater ease and convenience such as the assigning of telephone numbers to individuals (and others) that are independent of location
- Ensuring citizen access to balanced information and news. We would universally want and expect that everyone have access to balanced sources
- Ensuring preservation of multi-cultural values

- Protecting children, universally, from excessive propaganda including excessive exposure to "commercial advertisements"
- Universal access to telecommunications-based "tools of conviviality." Convivial tools are those that promote community harmony and reduce conflict

While the treatment of such "essential services" may at first appear daunting or outside the scope of the Board's jurisdiction, the Coalition strongly urges the Board to consider the mandate to encourage "advanced services" not as instruction to necessarily provide "high bandwidth services" but rather to provide for "advanced services" in the form of these "essential services."

In summary, the Coalition views the purpose of the Board as one that addresses not only basic services but advanced services as define here. It is in this way that the Board meets its overall mandate for education and public health (including community health in all its forms), and serves the true "public interest."

Question 57:

The LINCT Coalition appreciates the Commission's recognition of the needs of those whose low-incomes preclude maintenance of a consistent residence. We further appreciate the Commission's recognition of the contribution that wireless technology may be able to play in meeting the unique needs of low-income Americans.

The LINCT Coalition's analysis of current wireless technology as a potential cost-effective solution to universal access for America's lowest-income families has led us to the following conclusions: (1) although the cost of current wireless technologies may be affordable to businesses and many consumers; wireless is not currently an affordable solution to voice and data access for low-income consumers; (2) given the state-of-the-art of today's wireless technologies, it is feasible to create a type of wireless access that would be quite affordable and that would meet the needs of all low-income Americans who would otherwise remain underserved. The Coalition's description of this proposed wireless solution to universal access for the most underserved Americans has been provided to FCC staff and to

the NARUC Chairperson for the purpose of discussion and consideration. It is also available electronically at: (http://www.eff.org/pub/Groups/CITS/Reports/volksmodem_wireless_com.proposal).

The LINCT Coalition urges the Commission to examine the Coalition's recommendations regarding the wireless solution described in its proposal regarding universal access for those citizens the Commission had in mind in framing this question.

Question 66:

The phrasing of the question regarding the evolution of Universal Services suggests a process where the Board must continually reconsider their decisions. The Coalition encourages the Board to view their role as establishing the environment for evolution and invention of new Universal Services (or adaptation of existing Universal Services).

The Coalition suggests that the Board allocate a percentage of the Federal funds, say 5%, to the establishment of an Institute for the Advancement of Universal Services. Such an Institute would be modelled after the National Academy of Arts and provide seed grants for adaptation and invention of new aspects of Universal Services.

The formation of an on-going entity would provide the flexibility to meet changing technology. In between the times that the Board meets, the public is assured that the Institute will be responsive to changing technology and changing service needs propelled by the opportunities technology provides.

Such an Institute would keep internal overhead at a minimum, distributing funds for :
1.) Basic Technological Research, 2.) Basic Policy Research, and 3.) Innovation/Invention.

The Coalition restates the position that the Board is in place to deal with forms of "market failure" and to ignore the needs that such an Institute could meet is to put an overly-optimistic reliance on the market to serve those that the market has traditionally failed to serve.

Question 77:

This question raises what services should be provided under the Snowe-Rockefeller provisions of the Act.

The Coalition recognizes that the Board's role is primarily for "interstate" services. Nonetheless the Board must consider the relationship of different means of distributing information so that the actions of the Board does not "distort the market" unnecessarily between interstate data flows and intrastate flows.

We illustrate this by calling attention to a recently published report by two of the Coalition members *Creating Learning Communities: Practical, Universal Networking for Learning in Schools and Homes* (available at <http://www.cosn.org/EPIE.html>).

In particular, the report finds that very high capacity "Digital Video Discs" (DVD) containing 18 Gigabytes each will dramatically change the relative economies of local versus distant storage of information. A school district could place everything of relevance to schooling (except exploration of the Internet) on a carousel DVD player and incur no interstate telecommunications charges except for "tele-collaborative study projects" and the like. A 100 disc DVD carousel would cost about \$700 and the manufacturing cost of the 100 disks is around \$100.

What would help schools is low or no cost local access among libraries, schools and homes.

Yet if the Federal Board views its role as solely to treat "interstate" funding issues, the Board has the potential to seriously distort markets in favor of distant storage in contrast to local storage.

But neither would the Coalition want the Board to withhold funds for schools and libraries out of the belief that the states can carry the full burden.

To solve this dilemma, the Coalition suggests that any school or library that 'opts' for local storage of materials be eligible for a credit against the interstate charges that would have been incurred were the information/data have been transmitted via interstate facilities.