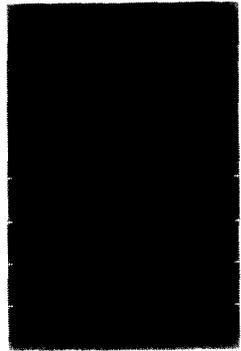




DELAINE EASTIN
State Superintendent of Public Instruction

DOCKET FILE COPY ORIGINAL

EXHIBIT 100-1496 FILED



May 7, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED
MAY 8 1996

Before the Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION

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

Re: Notice of Proposed Rule making
and Order Establishing Joint Board

REPLY COMMENTS

The California Department of Education (CDE) would like to thank the Federal Communications Commission for the opportunity to reply to the comments under review by the Federal-State Joint Board regarding Universal Services and the application of these services to schools, libraries and health care providers.

The CDE urges the Federal-State Joint Board to recommend that the Commission aggressively adopt rules and policies which will provide all schools, libraries and health care providers, without regard to geography and socioeconomic considerations, affordable, advanced communications technologies and access to a broad spectrum of telecommunications services dependent on the their technological requirements and readiness level. It is imperative that universal service provisions address equity issues providing all schools "high-speed, switched, broad band telecommunications capability that enables users to originate and receive high-quality voice, data, graphics, and video telecommunications using any technology." ¹

¹Comments of Alliance for Public Technology, April 1996.

ASL

The CDE has supported the deployment of telecommunications technologies within schools as a major component in educational reform. Deploying local and wide area networks with access to high-speed telecommunications services will shift the educational paradigm and offer teachers and students the opportunity to research, collaborate, publish, communicate and learn as never before. These opportunities are clearly articulated in the comments from Oakland and Mendocino Unified School Districts, the National Education Association, Secretary Riley, the Council of Chief State School Officers, and the Alliance for Public Technology. The Department has established network guidelines, set standards for communications networking and funded school networking activities.

State Superintendent Delaine Eastin's Education Technology Task Force is preparing a report that will highlight the need for schools to have appropriate technology, training, and instructional resources. It is the CDE's intent that every classroom and home in California have access to advanced, high-speed telecommunications services permitting families to be involved in the learning and teaching process. We believe that schools should become central to community development by providing centers of learning which will help aggregate market demand for the expansion of services.

Schools and districts in California want to take advantage of advanced telecommunications technologies, but are thwarted by the cost of services. About 20% of California schools have access to these technologies currently but in most cases the cost for telecommunications services is prohibitive or it is simply not available. The CDE agrees with the recommendations, made by Information Renaissance, that schools and libraries be provided free access to the local switching or distribution point which can provide high-speed telecommunications capability adequate to meet the demonstrated needs of each location. By adopting this approach, schools will be relieved of a major cost burden permitting them to focus resources on building local school infrastructure, purchasing equipment, training teachers and developing instructional resources.

We encourage the use and availability of a wide spectrum of telecommunications technologies that are tied to the requirements of the school. Schools must be afforded the opportunity of advanced telecommunications services as stated in section 706 of the Telecommunications Act. These services should not be dependent on any one specific technology but rather a range of services that will scale and evolve with the changing requirements of individual schools and address the dynamic nature of technology.

In light of California's geographic diversity and the diversity among California's 7,700, schools we urge the Commission to authorize an ADA type

allocation to schools rather than a discounted list of services. This funding structure will permit purchasing options for connectivity from multiple vendors rather than a discounted price list as some companies have proposed. Schools are at varying stages of development, some using telephone services others using cable, satellite, and high-speed telecommunications services such as ISDN and Frame Relay. A list of discounted phone services would not be beneficial to California schools. Having an ADA allocation established would better serve California schools so they can purchase what fits their needs dependent on their stage of technology deployment.

California is delighted that the Commission is seeking input on the universal service fund to address issues of deployment of new, high-speed telecommunications technologies that will open new avenues of learning for all students, teachers and communities. We have an unprecedented opportunity to make these technologies available to all schools, at an affordable price, ensuring that all schools can participate in the evolving information superhighway. Given the Task Force projection of \$6.7 billion over four years, we welcome the help of the universal service fund and the Snowe-Rockefeller amendment. We will direct our resources toward training, courseware development, and hardware acquisition to augment the fund. We hope to work with the Commission, other federal agencies and service providers to raise the visibility of on-line resources as a critical tool in implementing standards-based reform across the nation.

We would like to thank Information Renaissance for providing access to the comments on-line, the formatting and availability of the mailing addresses.

The CDE stands ready to help you during this critical decision making process. We are available to personally meet with you to discuss our position on universal service and the applications of advanced communications technologies for schools.

Respectfully submitted,



J. Richard Whitmore
Deputy Superintendent
Finance, Technology and Planning



Barbara O'Connor
Co-Chair Education
Education Technology Task
Force