Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF SECRETARY

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

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JOINT REPLY COMMENTS OF THE UNION CITY BOARD OF EDUCATION, HUDSON COUNTY SCHOOLS OF TECHNOLOGY, KINNELON PUBLIC SCHOOLS (KINNELON, NEW JERSEY), AND THE RIDGEWOOD COMMUNITY SCHOOL (RIDGEWOOD, NEW JERSEY)

The Union City Board of Education ("UCBOE"), Hudson County Schools of Technology ("HCST"), Kinnelon Public Schools ("Kinnelon"), and the Ridgewood Community School ("Ridgewood") respectfully submit the following reply comments in response to the Federal Communications Commission's ("FCC" or "Commission") March 8, 1996 Notice of Proposed Rulemaking ("NPRM") issued in the above-captioned proceeding.

Union City is an urban city in northern New Jersey's Hudson County, a ten-minute drive west of New York City. It has a predominately Latino population, a large percentage having recently arrived in the United States from the Caribbean, Central America, and South America. Union City is the most densely populated city in the United States (42,000 residents per square mile). The majority of its residents are of low and moderate income. The Union City Board of Education serves over 8,300 students in eleven schools. Approximately 95% of the students are Latino.

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The UCBOE's Christopher Columbus Middle School project, undertaken in partnership with Bell Atlantic, has won national recognition, including recognition by President Clinton and Vice President Gore, for its deployment of complete networks, connecting both at-risk students and their parents to the information superhighway at school and at home. The project has resulted in dramatic improvements in student achievement levels in reading, language, the arts, and math.

The Hudson County Schools of Technology ("HCST") is one of New Jersey's largest vocational school systems, providing a comprehensive range of educational and occupational training programs and services -- including technology education --to youth and adults in Hudson County since 1974. HCST's technology staff has over 70 years of combined professional and technical experience in telecommunications and information systems management, data processing, and electronic media coordination. The HCST Interactive Distance Learning System currently utilizes a two-way interactive television network (ITV), employing a fiber-optic backbone with DS3 digital links, interconnecting 26 sites to provide computer skills training and hands-on access to information and telecommunications technology for all citizens, with a special emphasis on targeted minority and low-income population segments.

UCBOE, HCST, Kinnelon and Ridgewood (hereinafter referred to as the "joint commenters") agree with those commenters who have urged the Commission to adopt rules that will, in the most aggressive manner possible, implement the full intent of Congress in enacting the universal service provisions of the Telecommunications Act of 1996 (the "1996 Act"). The Commission should adopt those standards of service to schools that will provide them with all of the benefits of advanced telecommunications and information technology at the most

affordable price. Advanced telecommunications and information technologies are no longer supplements to education but have become essential tools necessary to provide America's children with an adequate education and the skills needed to succeed in the workplace of the 21st Century.[1] A student or teacher who does not have access to online services is at a significant disadvantage. The Commission's rules should strive to ensure that such inequity in educational opportunity no longer exists.

New Section 254 of the Communications Act of 1934, as well as Section 706 of the 1996 Act, evidence that it was the intent of Congress to achieve the goal of affordable access to advanced telecommunications and information services for all Americans in all regions of the country. This goal demands that the focus of universal service be expanded well beyond the individual residence, and well beyond traditional telephone service. Public institutions, such as schools and libraries, are in a unique position to serve as key points of affordable access to the information infrastructure. Public schools and libraries are our country's universal providers of educational opportunity. As stated in the testimony of the Counsel of Chief State School Officers before the Federal-State Joint Board on Universal Service, public schools and libraries

> are at the core of preparing children and adults for civic responsibility, for economic productivity, and for economic participation in our society. They must prepare students with and for use of current technologies and those of the next century. . . . Access to telecommunications capacity in all schools and libraries is essential for the development of full individual potential and for each individual to contribute to the well-being of our nation.

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[1] By the year 2000, fully 60 percent of jobs in the U.S. will require a working knowledge of information technologies. See McKinsey & Co., Connecting K-12 Schools to the Information Superhighway (1995) ("McKinsey Report") at 7.

Testimony of Gordon M. Ambach before the FCC's Federal-State Joint Board on Universal Service at 1, CC Docket No. 96-45 (April 12, 1996). Accordingly, in establishing standards for universal service, schools and libraries should not be regarded as "beggars at the feast," but rather as honored guests, who will serve as the instruments of universal service policy.

The joint commenters also endorse the position set forth in the initial comments of the National School Boards Association, the American Library Association, et al., in this proceeding that access to the Internet through schools, libraries, community colleges, and community centers can be a cost-effective way to expand Internet subscribership to all Americans, particularly those who cannot afford to purchase the proper equipment. School- and library-based networks would allow those institutions to take on a new role as community learning centers, by serving as the access point in their community to reaching on-line information. Such community access centers would be particularly effective in rural areas, where residents may not only be less able to afford the necessary equipment, but would also have to pay more than residents of urban areas to reach on-line services and the Internet.[2]

It has been commonly observed that the vast majority of today's classrooms are not at the "cutting edge" of telecommunications technology. Few classrooms in the United States have

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[2] See Comments of NSBA, ALA, et al. in CC Docket No. 96-45 at 9-10 (April 10, 1996).

even basic telephone service.[3] Even fewer classrooms are connected to the Internet, and even many school libraries continue to have no Internet access.[4]

In establishing the definition of the services that are supported by Federal universal support mechanisms, the Commission should interpret Section 254(c)(1) as requiring it to consider all four of the criteria set forth in that section, but allowing it to include services that do not necessarily meet all of the four criteria. The joint commenters agree with the interpretation of Section 254(c)(1) provided in NPRM paragraph 9, that the use of the word "consider" in that section of the law provides the Commission with such latitude. If Congress had not intended to provide the FCC with discretion in this area, it would not have directed the Commission to "consider" these four factors, but instead would have simply stated that the services supported by universal support mechanisms shall meet those criteria. The joint commenters agree with the position stated in the comments filed by the International Society for Technology in Education ("ISTE") that it is essential that the four criteria of subsection (c)(1) be applied independently, because a majority of schools and libraries might consider several telecommunications services as essential for educational purposes, but such services might not be "subscribed to by a substantial majority of residential customers."[5]

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[3] Most schools have telephone lines only for administrative use. Only 12 percent of classrooms have telephones. McKinsey Report at 33.

[4] Although 49 percent of schools have local area networks, half of those are used only for administrative purposes. McKinsey Report at 33. Fewer than 10 percent of those local area networks were utilized to connect computers in all classrooms. Id. Fewer than 5 percent of schools have high-speed, high-quality ISDN or T-1 connections. Id.

[5] 47 U.S.C. § 254 (c)(1)(B) (emphasis added). See ISTE Comments in CC Docket No. 96-45 at 3 (April 12, 1996).

The joint commenters further agree with ISTE that it is imperative that the determination of what telecommunications features and services are essential to education be left to schools and libraries. Such determinations should be made by the schools and libraries through the choices they make as purchasers of telecommunications services offered to them by telecommunications carriers at discounted rates.[6] Generally, schools, classrooms and libraries should receive discounted rates for all available telecommunications services, regardless of whether such services are offered in a region under tariff or contractual arrangement. Accordingly, the joint commenters agree with the Commission's proposal in paragraph 77 of the NPRM to make both "core" telecommunications services covered under Section 254(c)(1) and "special" telecommunications services covered under Section 254(c)(3) available to schools and libraries at the discount contemplated by Section 254 (h)(1)(B).

In enacting Section 254, Congress recognized that "Universal service is an evolving level of telecommunications services,"[7] and that the FCC must take into account the continuing advances in telecommunications and information technologies and services. Similarly, the services available to schools and libraries at discounted rates should evolve over time, so that they keep pace with the developments in communications and information technology. As telecommunications technology advances, libraries and schools will envision and devise different approaches to meeting the needs of their students, teachers, and patrons.

With respect to the FCC's designation of special services eligible for universal service support, the joint commenters urge the Commission to adopt the broadest possible definition of

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[6] Comments of ISTE in CC Docket No. 96-45 at 3 (April 12, 1996).

[7] 47 U.S.C. § 254(c)(1)

"special services," so that the definition will include all of the services that schools and libraries need to take full advantage of advanced telecommunications in fulfilling their educational missions. Schools and libraries need and employ advanced telecommunications services to provide them with the ability to perform certain functions. Which technological approach will best enable them to perform those functions may vary from school district to school district, from school to school, or from library to library, depending on size, geographic location, demographics, the particular needs of any special populations to be served, and any number of other factors that may have a bearing on what approach would be most practical and cost-effective. Thus, different schools require a different mix of functionalities and, for this reason, the joint commenters agree with those commenters that have proposed that the Commission's rules not impose any particular technological solutions, or favor in any way any particular technologies.

The joint commenters support the Commission's focus on the capabilities or functionalities that should be supported by universal service mechanisms.[8] A definition of "special services" that focuses solely on the service and defines a funded service by prescribing a specific set of technical specifications for that service would be overly restrictive and could quickly become obsolete. Therefore, the Commission should define special services to include a broad range of telecommunications services that are capable of supporting a wide range of learning-related needs. In short, the Commission should establish a definition of special services that includes a full range of service options and ensures that schools and libraries will always be able to obtain discounted telecommunications services that are at the high end of the

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[8] NPRM at ¶ 80.

technology spectrum. The joint commenters also agree with the comments of Apple Computer, Inc. and others who have suggested that an "evolving definition of available facilities and functionalities is essential to assure that schools continue to have access to technologies and services that are not considered significant today."[9]

In its determination of what functionalities should be supported through universal service mechanisms for schools and libraries, the Commission should, at a minimum, incorporate any service and facility that is currently available. Additionally, as proposed by the National School Boards Association and its joint commenters, the Commission's rules should embody the principle that any telecommunications or information service that is commercially available in a given area should be considered to be a service that must be available to schools and libraries in that area at a discounted rate. The joint commenters propose that the Commission include in its definition of special services, at a minimum, local and world-wide long distance transmission of two-way voice, data and high quality video communications. The definition of special services should include broadband capability. Each school and library should be able to obtain high speed, switched broadband connections, and each school and library should be able to obtain these telecommunications services and customer premises equipment on an unbundled basis.

The joint commenters endorse the point emphasized in the initial comments filed by the American Library Association that text-based access to the Internet can in no way be considered

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[9] Comments of Apple Computer, Inc. in CC Docket No. 96-45 at 5 (April 12, 1996).

reasonable or effective public access.[10] In order for schools to make full use of the Word Wide Web's graphical capabilities and provide students and teachers with a gateway to national and international information resources, they must have the most modern two-way interactive capabilities. They must be able to obtain connections that have all of the speed and capacity that they decide is essential to meet their educational goals and needs, including, if they so choose, deployment of broadband networks. While some school districts may decide that a 56 Kbps ISDN line is sufficient, other districts that are already using T-1 lines would decide differently and should not be constrained in their ability to obtain comparable discounts for services and equipment.

The minimum standards described above are consistent with Congress' explicit recognition of the importance of advanced telecommunications to educational institutions. The legislative history of the 1996 Act evidences the type of state-of-the-art connections in classrooms to which Congress expected discounted rates and other support mechanisms to be applied.

> The provisions of subsection (h) [of Section 254] will help open new worlds of knowledge, learning and education to all Americans rich and poor, rural and urban. They are intended, for example, to provide the ability to browse library collections, review the collections of museums, or find new information on the treatment of illness, to Americans everywhere via schools and libraries.[11]

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[10] See Comments of American Library Association in CC Docket No. 96-45 at 8-10 (April 10, 1996).

[11] H. Conf. Rep. No. 104-458, 104th Cong.. 2d Sess. 132 (1996).

Many of the computers installed in schools are not connected to any internal or external network.[12] In many schools that currently have connections to the Internet, the school library or school media center is the only room in the school where students can obtain access to the Internet. The joint commenters agree with those commenters who urge adoption of universal service standards that will promote the connection of *all* school rooms to the Internet, and not just the school libraries, media centers and computer labs. The use of advanced information technology needs to be integrated into the curricula at all grade levels, and such integration requires consistent access to such technology, not just occasional or periodic access at those times when the individual class can fit into the computer lab's crowded schedule. If, however, the Commission finds it necessary and appropriate to establish time frames for telecommunications carriers' deployment of telecommunications equipment pursuant to Section 254(h)(1), the joint commenters urge the Commission to adopt a sequential approach that would, at a minimum, require immediate connection of school-based libraries and media centers, at the established discounted rates.

For the reasons outlined above, the joint commenters urge the Commission to reject the proposals of some commenters, such as the United States Telephone Association, that the universal service funding mechanism should be limited to funding only the provision of telecommunications services based on the KickStart "Lab" model.[13] The Lab model would provide schools with advanced communications capability only in the computer lab or

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[12] McKinsey Report at 32.

[13] See United States Advisory Council on the National Information Infrastructure, KickStart Initiative, Connecting America's Communities to the Information Superhighway (January 1996) (the "KickStart Report") at 92-94. See also McKinsey Report at 19-30.

multimedia room. The lab model would allow for only intermittent usage by students and teachers and is therefore wholly inadequate for incorporation into a national standard of special services eligible for support mechanisms that are aimed at timely deployment of advanced telecommunications capability to elementary and secondary school classrooms.

With respect to the discount methodology that should be utilized in providing telecommunications services to schools and libraries, the joint commenters respectfully suggest that the rules formulated by the Commission contain the clearest possible language, and require telecommunications carriers to similarly provide readily understandable information to those entities entitled to discounted services. Schools and local governments, have neither the substantial legal resources, nor sufficient financial resources to obtain the legal resources necessary to navigate a complicated set of rules and regulations governing their right to discounted services. Moreover, a discount methodology that is easy to understand and implement will minimize the regulatory burdens imposed on the Commission and State regulatory agencies, and reduce the number of instances of adjudication arising out of disputes over implementation of the required discounts.

The joint commenters support the discount methodology proposed in comments filed by the American Library Association as a reasonable approach that would not pose an undue burden on carriers or schools and libraries. Under this approach telecommunications services offered commercially under tariff or through contract in a geographic region would be made available to schools and libraries at the lower of either

1. The lowest price offered for such service to any customer; or

2. The Total Service Long-Run Incremental Cost ("TSLRIC") of providing that service.[14]

The joint commenters, however, would modify this proposed methodology slightly, to ensure that it is not used by service providers as a means by which to raise rates to some schools and libraries that have previously been offered lower rates. Thus, the price paid by a school or library would be the lower of

1. The carrier's current rate or bid:
2. The lowest price offered for such service to any other customer; or
3. The TSLRIC.

The proposed methodology has as an advantage that it does not favor any particular technology and therefore, it can continue to be applied as technology evolves. TSLRIC is a formula for cost allocation that is well established and accepted by economists and regulators; it can be adapted for both interstate and intrastate services. However, as noted by the ALA in its initial comments, further discounts on core services and special services in addition to those described above would be needed for schools and libraries in rural, isolated and high cost areas.[15]

The joint commenters urge the Commission to reject proposals such as the one included in the initial comments of the National Cable Television Association, Inc. ("NCTA"), that the

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[14] Comments of American Library Association in CC Docket No. 96-45 at 14. TSLRIC is an incremental cost concept used in telecommunications and other industries. The TSLRIC methodology looks at the long-run incremental cost of providing service to an additional customer, and through this approach would make commercially available services affordable to the maximum number of schools and libraries. Id. at 15.

[15] Id. at 16.

FCC formulate no discount methodology at all and simply rely on the existence of a competitive bidding process to yield discounted rates to schools and libraries.[16] In this element of its proposal, the NCTA makes the erroneous and unsupported assertion that any discount at all off of the prevailing commercial rate, no matter how small, results in a rate that is "affordable" under the mandate of the universal service provisions of the 1996 Act.[17] Furthermore, the NCTA fails to address how meaningful discounts for schools and libraries should be achieved if, in a given region, no more than one telecommunications carrier chooses to compete in a bidding process for certain services specified by the school or library. In this regard, the NCTA's proposal calls to mind the experiences of the vast majority of municipalities in cable television franchising and franchise renewal, where cable operators had no incentive to lower cable subscription rates because rarely was a second cable operator willing to enter into another operator's franchise territory to offer competitive service.

In order to reduce the need for schools and libraries to expend scarce resources on tracking of various telecommunications services rates to determine what the appropriate discounted rate should be, telecommunications carriers should be required to provide schools and libraries periodically, and upon request, certain information about tariffed services and services

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[16] See Comments of the National Cable Television Association, Inc. in CC Docket No. 96-45 at 18 (April 12, 1996).

[17] Id.

offered under contract.[18] Additionally, carriers should be required to provide schools and libraries with information about the TSLRIC rate for any desired service.

And most importantly, telecommunications carriers should be required to certify in writing that the quoted rate is the TSLRIC rate and that no customer is being offered the service at a lower rate. If the service in question is being offered to any customer below the TSLRIC rate, schools and libraries should receive the lowest rate offered, and again the carrier should provide a written certification that this is the case. Should a carrier's certifications subsequently be discovered to be untrue, the carrier should be subject to civil sanctions as appropriate under applicable federal, state or local law pertaining to the making of false statements to a government agency.

In response to the Commission's inquiry in paragraph 84 of the NPRM on what steps should be taken to ensure that telecommunications services provided to schools and libraries at a discount are used "for educational purposes," and not "sold, resold, or otherwise transferred" in consideration for money or other things of value, the joint commenters agree with those commenters who have responded that a written certification is a sufficient mechanism, on the grounds that it is simple, effective and least intrusive. The joint commenters, however, do share the concern expressed by the American Library Association that this requirement not be

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[18] The joint commenters strongly disagree with the proposal contained in AT&T Corporation's initial comments that [c]arriers should not be required to inform each school and library within their geographic serving area of the available discounts." Comments of AT&T Corp. in CC Docket No. 96-45 at 20 (April 12, 1996). AT&T offers no explanation for its conclusion that educational and library associations would be more efficient in performing this function, particularly when the information to be disseminated is uniquely within the control of the telecommunications carriers and involves a subject area which is normally outside the scope of those associations' expertise.

construed in a manner that would discourage schools and libraries from sharing a network with parties ineligible for universal service support or discourage partnerships between schools and libraries and their communities.[19]

The rule adopted by the Commission to implement Section 254(h)(3) should provide that a school or library is in compliance with that section if the supported facility is being used primarily for educational purposes. The joint commenters agree with those other commenters that have proposed that the restriction on the resale of telecommunications services or network capacity should not preclude the charging of computer lab fees for students or user fees to defray the considerable expenses that schools and libraries will incur in connection with the use of their networks. In order not to preclude development or operation of consortia and cooperatives of libraries and schools, the Commission's rules should make clear that the transfer of services or network capacity for money or other things of value among eligible entities is not prohibited. The Commission should not interpret the statutory restriction to render a school or library network ineligible for discounted services because it shares network resources with government entities, institutions of higher education, community-based social service agencies, or other nonprofit entities. All of the clarifications suggested above are totally consistent with the Congressionally-expressed intent of the statutory language. The Conference Report that accompanied the legislation explains that subsection (h)(3) of Section 254 clarifies that schools and libraries may not resell or transfer telecommunication services or network capacity "*for monetary gain*," i.e., for profit.[20]

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[19] Comments of ALA at 21.

[20] H. Conf. Rep. No. 104-458, 104th Cong., 2d Sess. 133 (1996)

Paragraph 85 of the NPRM sought comment on what should constitute a "bona fide request" for telecommunications services for schools and libraries. The joint commenters agree with the Commission's proposal that any person qualified under state or local law to order telecommunications service for schools or libraries should be deemed capable of making a "bona fide request" for service. The Commission's approach is reasonable and, unlike some of the suggestions contained in initial comments filed by some of the carriers, imposes no unnecessary burdens and creates no obstacles to achieving Congress' goal of deploying advanced telecommunications capability to all elementary and secondary schools and classrooms on a timely basis.

In contrast, commenters such as the United States Telephone Association and the NYNEX Telephone Companies have proposed that the Commission establish onerous procedures before a school or library's request for discounted services could be considered bona fide. The United States Telephone Association has proposed that in order to qualify as a bona fide request, the FCC should require "qualified schools and libraries to develop a comprehensive plan for funding, implementing and covering the ongoing costs" of what USTA believes to be the seven components necessary to successful implementation of telecommunications services.[21] NYNEX has suggested that before a request for discounted services is honored, each school be required to develop a proposal for implementing technology in the classroom to be submitted to a State Authority for certification that the proposal was consistent with whatever "vision" is developed by a new federally-created education telecommunications council.[22]

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[21] Comments of the USTA in CC Docket No. 96-45 at 7-8 (April 12, 1996).

[22] Comments of NYNEX in CC Docket No. 96-45 at 21-22 (April 12, 1996).

The layers of review sought to be imposed by proposals such as those cited above serve no useful purpose and would only create a significant delay in deployment of advanced telecommunications capabilities to America's classrooms. The government bureaucracy and system of checks and balances sought to be created by such proposals already exists at the state and local government levels. Development of school- and library-based computer networks will require, in addition to some universal service support, the investment of a substantial amount of state and local financial resources. School and library administrators responsible for making such decisions are already held accountable for the cost and effectiveness of their decisions by state and local elected officials and local taxpayers.

For the reasons stated above, the Joint Board should adopt recommendations and the Commission should adopt rules consistent with the proposals outlined in these comments.

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May 7, 1996

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a true and correct copy of the foregoing Joint Reply Comments of the Union City Board of Education, Hudson County Schools Of Technology, Kinnelon Public Schools, and the Ridgewood Community School was served this 7th day of May, 1966, by first class mail, postage prepaid, on each of the following persons.

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