

established, it would have to include members of the school and library community to ensure representation of all relevant views.

39. Should a proxy model account for the cost of access to advanced telecommunications and information services, as referenced in section 254(b) of the Act? If so, how should this occur?

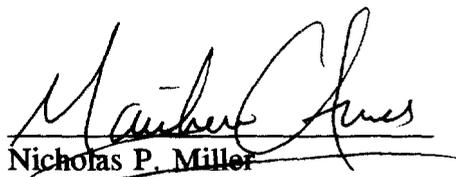
Answer: The Commission and the Joint Board should ensure that any proxy models it uses are as accurate possible. For this reason, it may be necessary to use separate proxy models for different types of services. We urge the Joint Board not to use a single proxy model to estimate costs for both core services and special services to schools and libraries unless the Joint Board is assured of the accuracy of the model as applied to all the services it purports to address. The Joint Board has ample information regarding the costs of connecting schools and libraries; we believe that this information is sufficient to address the cost of providing those services. A general proxy model for core telephone services, or even for advanced services to residential subscribers, could be very different, much more generalized, and therefore less accurate than the specific information the Joint Board has been provided regarding the cost of serving schools and libraries. These differences might lead to inaccuracies if applied to schools and libraries. Educational institutions are very different types of entities from residential subscribers, and the costs of serving them may well be different. Thus, although it may be possible to link proxy models and ensure that they work together to

address all the relevant issues, it is probably necessary, at least until the network for advanced services has been largely built out, to rely on different models for different services.

Conclusion

EDLINC urges the Joint Board to recommend that the Commission adopt rules ensuring that all eligible schools and libraries have access to the broadest permissible range of services, at prices that will deliver the benefits of advanced telecommunications technology nationwide.

Respectfully submitted,



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August 2, 1996

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APPENDIX A -- DESCRIPTION OF EDLINC MEMBERS

EDLINC is a coalition of educational and library groups that have been working together to provide schools and libraries with affordable access to telecommunications and to ensure the effective implementation of the Snowe-Rockefeller-Exon-Kerrey Amendment. They include the National School Boards Association ("NSBA"), the American Library Association ("ALA"), including the American Association of School Librarians, a Division of ALA, the National Education Association ("NEA"), the Consortium for School Networking ("CoSN"), the Council of Chief State School Officers ("CCSSO"), Education Legislative Services, Inc. ("ELS"), the National Association of Independent Schools ("NAIS"), the National Association of Secondary School Principals, the Alliance for Community Media, the American Association for Adult and Continuing Education, the Association for the Advancement of Computing in Education, the National Association of Elementary School Principals, the American Association of School Administrators, the American Psychological Association, the Council for American Private Education, the Council for Educational Development and Research, the Center for Media Education, the Federation of Behavioral, Psychological and Cognitive Sciences, the Global Village Schools Institute, the National Association of Student Financial Aid Administrators, the National Rural Electric Cooperative Association, the United States Catholic Conference and the United States Distance Learning Association.

The NSBA is the nationwide advocacy organization for public school governance. NSBA represents the nation's 95,000 school board members. These board members govern 15,025 local school districts that serve more than 40 million public school students -- approximately 90 percent of all elementary and secondary students in the nation. Virtually all school board members are elected; the remainder are appointed by elected officials. NSBA's mission is to foster excellence and equity in public elementary and secondary education in the United States through local school board leadership. NSBA supports the capacity of each school board -- acting on behalf and in close concert with the people of its community -- to envision the future of education in its community, to establish a structure and environment that allow all students to reach their maximum potential, to provide accountability for the people of its community on performance in the schools, and to serve as the key community advocate for children and youth and their public schools.

The ALA is a nonprofit educational organization of 57,000 librarians, library educators, information specialists, library trustees, and friends of libraries representing public, school, academic, state, and specialized libraries dedicated to the improvement of library and information services. A new five-year initiative, ALA Goal 2000, aims to have ALA and librarianship be as closely associated with the public's right to a free and open information society - intellectual participation - as it is with the idea of intellectual freedom. ALA Goal 2000 also emphasizes the importance of equity on the information superhighway and continues ALA's efforts to advocate for the highest quality of library and information services for all Americans.

The NEA, with over 2.2 million members, is the nation's largest professional employee organization, representing elementary and secondary teachers, higher education faculty, educational support personnel, retired educators, and students preparing to become teachers. NEA is focused on the issues and needs of education and the teaching profession.

The CoSN is a membership organization of institutions formed to further the development of computer-based networking among Kindergarten through 12th grade staff and students throughout the country. CoSN seeks to assure that schools develop sound networking systems and appropriate curricular applications. Our goal is for every classroom in the country to be connected to the Internet by the year 2000. We are working with other groups and policy makers to make sure all schools have affordable access to the NII.

The CCSSO is a nationwide, nonprofit organization comprised of the public officials who head the departments of elementary and secondary education and, in some states, other aspects of education in the state, five U. S. extra-jurisdictions, the District of Columbia, and the Department of Defense Schools. The Council has served as an independent voice on federal education policy since 1927, and has maintained an office in Washington, DC since 1948. Since 1908, chief state school officers have conferred with the U. S. Congress and federal agencies "to consider educational interests common to all states...which furthered by a free comparison of views." In representing the chief education administrators, the Council speaks on behalf of state education agencies, which have the primary authority for education in each state, and carries national influence commensurate with this position. The Council's members develop consensus on major issues, which the Council advocates before the President, federal agencies, the Congress and the public.

ELS is a private San Diego, California firm, with Washington, D.C. offices, that provides information, advocacy and assistance to its clients on a wide range of federal legislative and regulatory matters that affect public elementary and secondary education. It focuses on issues of funding, general, special and vocational education programs; child nutrition, health and safety; immigration and language proficiency; telecommunications and educational technology, among others. ELS's clients are California public school districts exclusively and include the following: Oakland Unified School District; San Diego Unified School District; Sacramento City Unified School District; San Francisco Unified School District; Fresno Unified School District; Centra California Education Legislation Consortium; Long Beach Unified School District; West Contra Costa Unified School District.

NAIS is a voluntary membership organization of over 1,100 member schools and associations in the United States and abroad, and is the national institutional advocate for independent precollegiate education. NAIS represents 416,000 students, 53,200 teachers and instruction support personnel, and 8,600 administrators in the U.S.

**APPENDIX B -- SELECTED TABLES SHOWING
EXISTING STATE DISCOUNT PLANS**

Source: Promoting Educational Infrastructure
and the Role of the Florida Public
Service Commission, Bureau of
Research and Policy Analysis,
Division of Research and Regulatory
Review, Florida Public Service
Commission (May 1996).

SUMMARY OF STATE SURVEY²⁴

STATE	COMMISSION PLAN IDENTIFIED	DISCOUNTED RATE IDENTIFIED
ALABAMA	NO	YES
ALASKA	NO	NO
ARKANSAS	NO	YES
ARIZONA	NO	NO
CALIFORNIA	YES	NO
COLORADO	NO	NO
CONNECTICUT	NO	NO
DELAWARE	NO	NO. Special contracts
GEORGIA	NO	YES
HAWAII	NO	NO
IDAHO	NO	NO
ILLINOIS	NO	YES
INDIANA	YES	NO
IOWA	NO	NO
KANSAS	NO	YES
KENTUCKY	NO	NO
MAINE	YES	YES
MARYLAND	NO	NO
MASSACHUSETTS	NO	NO
MICHIGAN	YES	NO
MINNESOTA	NO	YES
MISSISSIPPI	NO	YES
MISSOURI	NO	YES
MONTANA	NO	NO
NEVADA	NO	NO
NEBRASKA	YES	YES

²⁴Louisiana responded, but not in time to be included in the results.

Table 3-1
Page 2 of 2

STATE	COMMISSION PLAN IDENTIFIED	DISCOUNTED RATE IDENTIFIED
NEW HAMPSHIRE	NO	NO
NEW JERSEY	YES	YES
NEW MEXICO	NO	NO
NEW YORK	YES	NO
NORTH CAROLINA	NO	NO
NORTH DAKOTA	NO	NO
OHIO	YES	NO
OKLAHOMA	YES	YES
OREGON	NO	NO
PENNSYLVANIA	NO	NO
RHODE ISLAND	YES	NO, pending
SOUTH CAROLINA	NO	YES
SOUTH DAKOTA	NO	NO
TENNESSEE	YES	YES
TEXAS	YES	YES
UTAH	NO	NO
VERMONT	NO	NO
VIRGINIA	NO	NO
WASHINGTON	NO	NO
WEST VIRGINIA	YES	YES
WISCONSIN	NO	YES
WYOMING	NO	NO
TOTALS	13 COMMISSION PLANS IDENTIFIED	17 DISCOUNT RATES IDENTIFIED

SERVICE: POTS
K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-2

STATE	DISCOUNTED RATE*
ALABAMA (South Central Bell)	<i>Classroom</i> - \$10.44 per month
GEORGIA (BellSouth)	<i>Classroom</i> - \$5.60 to \$8.08 month
MAINE (NYNEX)	<i>Library</i> - \$12.00 per month (for first or second business voice-grade access line)
MINNESOTA (Statewide)	<i>Classroom</i> - Rate to be less than business rate and greater than or equal to residential rate
MISSISSIPPI (South Central Bell)	<i>Classroom</i> - \$10.00 per month (approximation)
SOUTH CAROLINA (BellSouth)	<p><i>Classroom</i> -</p> <ul style="list-style-type: none"> • Individual Line Service \$8.00 per month (Local usage charge capped at \$15.00 per month) • Rotary Line Service²⁵ \$16.50 per month • Local Usage Discount Package \$2.00 per line (Twenty percent discount for all local usage charges) • Local Usage Package \$30.00 per line (Waives all local usage charges)
TENNESSEE (Statewide)	<p><i>Classroom</i> - \$11.00 per month (Local usage charge capped at \$6.00 per month)</p>

*The rates listed are for basic exchange service where discounts apply. Total charges per month may include additional service charges.

²⁵Multi-line business service that allows rolling from a busy line to another line in a hunt group.

SERVICE: 56 kbps DIGITAL DATA SERVICE
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-3

STATE	DISCOUNTED RATE
ARKANSAS* (Southwestern Bell)	<p><i>Education, medical, and government: (3 year fixed rate contract)</i></p> <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$90.00 per month (channel termination plus fixed channel mileage) • \$0.45 per mile per month (channel mileage per mile)
MISSISSIPPI (South Central Bell)	<p><i>Schools -</i></p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$453.00 for first line • \$213.00 for subsequent lines <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$140.00 per month (channel termination plus interoffice channel) • \$1.25 per mile per month (interoffice channel per mile)

*ALLTEL also has a discount on 56 kbps service in Arkansas.

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SERVICE: 56 kbps FRAME RELAY SERVICE
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-4

STATE	DISCOUNTED RATE
MAINE (NYNEX)	<p><i>Public Schools and Libraries -</i></p> <p>INSTALLATION CHARGE:</p> <ul style="list-style-type: none"> • Included in a standard package, a part of which is funded by NYNEX ratepayers.
WEST VIRGINIA (Bell Atlantic)	<p><i>Schools -</i></p> <p>INSTALLATION CHARGE:</p> <ul style="list-style-type: none"> • \$820 per line (Maximum) <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$114 per month for first line • \$150 per month for subsequent lines (or the prevailing interstate rate, whichever is lower)



SERVICE: ISDN-BRI
K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-5

STATE	DISCOUNTED RATE
TENNESSEE (Statewide)	<i>Schools -</i> \$13.85 plus residential rate (Installation charges waived through year-end 1995.)

SERVICE: DS-1 (1.544 mbps)
K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-6

STATE	DISCOUNTED RATE
ARKANSAS* (Southwestern Bell)	<p><i>Education, medical, and government -</i> (3 year fixed rate contract)</p> <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$132.75 per month (channel termination plus fixed channel mileage) • \$10.60 per mile per month (channel mileage per mile)
MISSISSIPPI (South Central Bell)	<p><i>Schools -</i></p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$770.00 (channel termination) • \$335.00 (interoffice channel) <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$210.00 per month (channel termination plus interoffice channel) • \$7.00 per mile per month (interoffice channel per mile)
OKLAHOMA (Southwestern Bell)	<p><i>Education, medical, and government -</i> (3 year fixed rate contract)</p> <p>NONRECURRING: \$460</p> <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$185.00 per month (maximum for channel termination plus fixed channel mileage) • \$15.50 per mile per month (maximum for channel mileage per mile).

*ALLTEL also has a discount DS-1 service in Arkansas.

SERVICE: 1.544 mbps FRAME RELAY SERVICE
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-7

STATE	DISCOUNTED RATE
WEST VIRGINIA (Bell Atlantic)	<i>Schools -</i> INSTALLATION CHARGE: <ul style="list-style-type: none"> • \$950 per line FIXED CHARGES: <ul style="list-style-type: none"> • \$390 per month

SERVICE: DS-3 (45 mbps)
K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-8

STATE	DISCOUNTED RATE
ARKANSAS* (Southwestern Bell)	<p><i>Education, medical, and government -</i> (3 year fixed rate contract)</p> <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$2,030 per month (channel termination plus fixed channel mileage) • \$72 per mile per month (channel mileage per mile)
OKLAHOMA (Southwestern Bell)	<p><i>Education, medical, and government -</i> (3 year fixed rate contract)</p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$637.00 for first line • \$496.00 for subsequent lines <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$2,782.40 per month (maximum for channel termination plus fixed channel mileage) • \$78.25 per mile per month (maximum for channel mileage per mile)

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* ALLTEL also has a discount DS-3 service in Arkansas.

SERVICE: DIGITAL VIDEO SERVICE (1.544 mbps)
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-9

STATE	DISCOUNTED RATE
KANSAS (Southwestern Bell)	<p><i>Schools</i> - (Minimum 5 year contract)</p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$480+ (Intra-Cluster Channel and Inter-Cluster Connectivity) • \$60.00 (Ethernet option) <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$1,155 per month (Intra-cluster channel) • \$425 per month (Ethernet option for intra-cluster channel termination) <p>USAGE CHARGES:</p> <ul style="list-style-type: none"> • \$0.32 per minute (Inter-cluster connectivity) • \$0.165 per minute (Ethernet option)
MISSOURI (Oregon Farmers Mutual Telephone Company)	<p><i>Schools</i> -</p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$667 (Local distribution channel and interoffice channel) • \$133.00 (Hubbing) • \$1,600.00 (Quad split option) <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$867.30 per month (per local distribution channel) • \$3.70 per 1/4 mile per month (per local distribution channel) • \$29 per month (interoffice channel) • \$19.30 per mile per month (per interoffice channel) • \$40.40 per month (per hubbing location) • \$4,680.50 per month (Quad split option)

SERVICE: DIGITAL VIDEO SERVICE (45 mbps)
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-10

STATE	DISCOUNTED RATE
MISSOURI (Oregon Farmers Mutual Telephone Company)	<p><i>Schools -</i></p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$667 (Local distribution channel and interoffice channel) • \$133.00 (Hubbing) • \$1,600.00 (Quad split option) <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$1,335.70 per month, plus \$52.40 per month for second through eighth 1/4 mile or fraction, plus \$21.50 per month for each additional 1/4 mile or fraction (per local distribution channel) • \$98.80 per month (per interoffice channel) • \$57.60 per mile per month (per interoffice channel) • \$200.70 per month (per hubbing location) • \$2,465.60 per month (Quad split option)

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SERVICE: VIDEO SERVICE
K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-11

STATE	DISCOUNTED RATE
ILLINOIS (Ameritech)	<p><i>Schools</i> - Advanced Video Service (3 year fixed rate contract)</p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$1,000 per port <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$1,640.00 per month per port for up to 80 hours <p>USAGE CHARGES:</p> <ul style="list-style-type: none"> • \$10.00 per hour per port for hours 81-200; • \$2.00 per hour per port for hours above 200
KANSAS* (Southwestern Bell)	<p><i>Schools</i> - Analog Video Service</p> <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$1,155+ per month
MISSOURI** (Oregon Farmers Mutual Telephone Company)	<p><i>Schools</i> - Analog video Service</p> <p>NONRECURRING:</p> <ul style="list-style-type: none"> • \$880 (Local distribution channel and interoffice channel) • \$267.00 (Hubbing option) <p>FIXED CHARGES:</p> <ul style="list-style-type: none"> • \$524.10 per month, plus \$52.40 per month for second through eighth 1/4 mile or fraction, plus \$21.50 per month for each additional 1/4 mile or fraction (per local distribution channel) • \$160.30 per mile per month (per interoffice channel) • \$551.20 per month (per hubbing location)

* United in Kansas provides full motion or compressed interactive video services to qualified educational and medical institutions at a 25% discount off tariffed rates or customer specific pricing.

** Southwestern Bell in Missouri also provides a discount for video services.

SERVICE: VIDEO SERVICE, *continued*
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-11

STATE	DISCOUNTED RATE
NEBRASKA	<p><i>Schools -</i></p> <ul style="list-style-type: none"> • 50% discount (Digital Data Services and High Capacity Services for provision of Two-way Interactive Video Services.) • Individual case basis (Other Educational Interactive Video Services)
NEW JERSEY (Bell Atlantic)	<p><i>Schools -</i></p> <ul style="list-style-type: none"> • \$1,050 per month (\$995 for special needs district) for county-wide Interactive Distance Learning Service • \$1,350 (\$1295 for special needs district) for LATA-wide Interactive Distance Learning Service.



SERVICE: OTHER REGULATED SERVICES
 K-12 DISTANCE LEARNING DELIVERY SYSTEMS

Table 3-12

STATE	DISCOUNTED RATE
MAINE (NYNEX)	<p><i>Public schools and libraries -</i></p> <ul style="list-style-type: none"> • Up to 300% increase in intrastate toll calling minutes above their current usage at no additional charge. • \$.11 per minute for any toll usage over the 300% level
OKLAHOMA (Southwestern Bell)	<p><i>Schools -</i></p> <ul style="list-style-type: none"> • No charge for intraLATA long distance services beginning January 1, 1996, until OneNet connections are available or until January 1, 1999, whichever occurs first.
TEXAS (Statewide)	<p><i>Schools -</i></p> <p>For any communications services used predominantly for distance learning purposes:</p> <ul style="list-style-type: none"> • 25 percent discount, initially. • Ultimately, no less than 105%, and no greater than 110% of the customer specific long run incremental cost.
WISCONSIN (Statewide)	<p><i>Education, government -</i></p> <p>Discounts for the following services:</p> <ul style="list-style-type: none"> • Two-way interactive video services; • High-speed data transfer; • Toll call access to the Internet; • Direct internet access. <p>of:</p> <ul style="list-style-type: none"> • 30% per month or \$300 per month for the first year • 20% per month or \$200 per month for the second year • 10% per month or \$100 per month for the third year

NUMBER OF STATES OFFERING DISCOUNTS, BY SERVICE

SERVICE	NUMBER OF STATES OFFERING A DISCOUNT
POTS	7
56 kbps Digital Data Service	2
56 kbps Frame Relay Service	1
ISDN-BRI	1
DS-1 (1.544 mbps)	3
1.544 mbps Frame Relay Service	1
DS-3 (45 mbps)	2
Digital Video Service (1.544 mbps)	3
Digital Video Service (45 mbps)	1
Video Service	5
Other Regulated Services	4

Certificate of Service

I hereby certify that I have caused to be mailed this 2nd day of August, 1996, copies of the foregoing Joint Comments of Education and Library Network Coalition by first class mail, postage prepaid, to the following persons:

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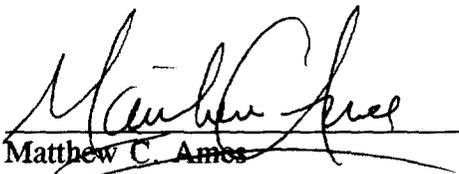
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