



**AMERICAN ASSOCIATION  
OF EDUCATIONAL  
SERVICE AGENCIES**

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December 18, 1996

Federal Communication Commission  
Attn. Federal State Joint Board on Universal Service  
1919 M St. NW  
Washington, DC 20554

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OFFICE OF THE SECRETARY  
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Docket No. 96-45

Dear Members of the Federal State Joint Board on Universal Service:

The American Association of Education Service Agencies (AAESA) is the professional organization for education service agency leaders, board members and staff. While AAESA has been monitoring the Telecommunications Law thought the actions of EDLINC, our association thought it would be best to respond directly to the Joint Board on the topic of consortia as addressed in the proposed rules and regulations, since by our very nature, we will be the educator's choice for consortium needs.

First, we wish to thank you for strongly supporting education, especially endorsing the use technology in the classroom to expand students minds and broaden their horizons. Using technology for educational purposes is critical for our school districts. Schools need to utilize all sources of connectivity available today and those not yet envisioned.

AAESA would like to bring up six points for consideration when you review the proposal. We have addressed nothing out of the ordinary, just points to consider as submitted by the education consortium entities recognized by federal, state and local law.

When reviewing the draft proposal, please continue to remain as technology neutral as possible. Local schools and libraries need maximum flexibility to determine the best technologies to meet their own unique needs. While some fiber proponents have strongly discouraged wireless technology, wireless often is the best choice (particularly in the West) because of terrain, cost, convenience, efficiency and weather. To account for regional differences, local entities need the freedom to choose technologies as they see fit.

When the Board considers what constitutes a "disadvantaged" area and a "high cost" area, the definition decided on must consider uniquely rural issues, including toll costs associated with rural and remote schools and libraries. Distance to urban centers and lack of population density are major issues that must be included when considering what constitutes a "high cost" area as well.

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Schools must not be limited to school lunch statistics (real or potential) in determining economic disadvantage. Schools need the flexibility to consider other reasonable factors, including census data. As we understand it, AAESA supports EDLINC proposal's for an alternative formula when figuring the discount.

With regard to eligibility, the Act currently states that schools must meet the statutory definitions found in the "Elementary and Secondary Education Act of 1965." This definition should be clarified to state, the "Elementary and Secondary Education Act of 1965, as amended by the Improving America's Schools Act of 1994, IASA." Education service agencies (ESA's) are defined in the IASA, thus eligible for the same federal grants and funding streams as school districts. ESA's are funded through state or local funding streams with small supplementary grants from the federal government. This arrangement is determined within each state and should be kept so, but ESA's need to be included in the definition for federal tracking purposes.

With regard to consortia, the definition must explicitly state the eligibility of ESA's because they often serve as the regional hubs for large numbers of public and private schools. To exclude ESA's would be tantamount to excluding most rural schools. Education service agencies must also be able to figure their discount formulas in the same manner their member schools do, because ESA's use technology for educational purposes, such as distance learning; direct instruction in low incidence areas, such as special education, vocational education; and advance placement or honors courses.

We also request that consortia members be able to determine who is involved in the consortium and take on the task of segregating the bookkeeping. In Washington state, educational service districts provide the backbone for the state's evolving technology education networks, which include community colleges, vocational institutions and state universities, along with elementary and secondary schools. This is a local and state decision. We recognized the added paperwork requirement, but we are willing to fill out the forms to continue our consortia relationships.

Again, thank you for your stance on education and the use of technology in the classroom and school buildings. We recognize that there may be some unforeseeable trouble spots that we will need to deal with when we encounter them, but this proposal is a great step in the right direction and we look forward to working with the Board and the state commissioners to see this implemented, hopefully by school year 1997-98.

Sincerely,



Bruce Hunter  
Executive Director



**AMERICAN ASSOCIATION OF  
EDUCATIONAL SERVICE AGENCIES**

1801 North Moore St.,  
Arlington, VA 22209

**The Honorable Reed E Hundt  
Chairman  
Federal Communications Commission  
1919 M Street NW Room 814  
Washington DC 20554**



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NEW YORK STATE  
**SCHOOL BOARDS ASSOCIATION**

The Dodge Building • 119 Washington Avenue, Albany, New York 12210 • (518)465-3474/FAX (518) 465-3481

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December 11, 1996

The Honorable Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

Re: CC Docket No. 96-45

Dear Chairman Hundt:

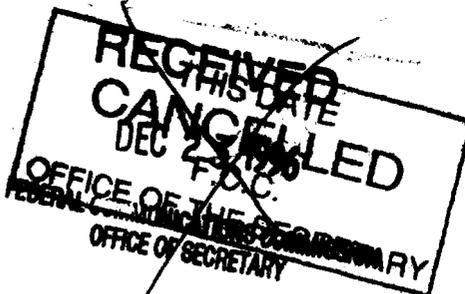
On behalf of the 5,500 members of the New York State School Boards Association, I am writing to thank you for your leadership and that of the Joint Federal-State Board on Universal Service for their unanimous support of an education rate (E-Rate) that will ensure affordable access to the Information Superhighway for schools. I urge the FCC to fully adopt the recommendations of the Joint Board.

The proposed discount range of 20 to 90 percent will ensure the accessibility of telephone, cable and services that permit high-speed Internet connections and distance learning opportunities to schools, regardless of the local district's ability to afford these critical educational advances. The flexibility of the recommended plan is important because it will allow school districts to choose services that best ameliorate their educational and technological challenges. Extension of discount rates to Internet connections and access assures that all schools can use the Information Superhighway, which has become a vital classroom learning tool.

Again, I urge you to consider the importance of ensuring access to advanced technology to all school districts so that all school children can be prepared for the challenges of the 21st Century.

Sincerely,

Louis Grumet  
Executive Director

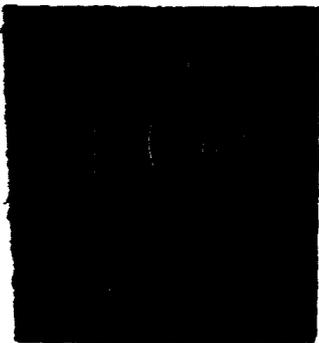


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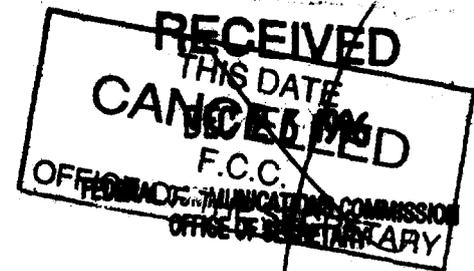
The Honorable Reed Hundt  
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1919 M Street, NW, Rm 814  
Washington, DC 10554

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DOCKET FILE COPY ORIGINAL

December 19, 1996

Federal Communications Commission  
Attn: Federal State Joint Board on Universal Service  
1919 M Street, NW  
Washington, DC 20554



Docket No. 96-45

Dear Members of the Federal State Joint Board on Universal Service:

We are writing on behalf of the state affiliates listed below that constitute The Northern Tier (TNT) caucus of state affiliates to the National Education Association. Our states were brought together by shared characteristics, most notably large geographic areas with relatively sparse populations. It is these characteristics that unite us in our concerns relative to universal service fund expenditures for schools and libraries.

We applaud the Joint Board for its recommendations, which go far toward bringing America's schools and libraries into the information era. In particular we were pleased that the special needs of low income students and those in high cost areas were identified for higher discounts. However, we are concerned that under the current language the information superhighway may continue to bypass a large segment of students.

Experience in our states suggests that the relatively minor adjustments allotted for "high cost areas" will not sufficiently lower the economic barriers facing many of our communities. And, unless more clearly defined, the current benchmarks for remote, rural areas could institute prohibitive costs as the starting point.

A 5-10% differential based on the cost of service may provide little more than symbolic support to remote sites saddled with exorbitant infrastructure costs and/or major expenditures for toll calls to the Internet. For instance, in McGrath, Alaska the least expensive Internet service provider charges \$6.00 an hour for low speed, dial-up access. Since one-third of the district's students are in the free/reduced lunch program, the district would be eligible for a 60% discount, which unfortunately would not remove the economic impediments to wide spread use. The South Dakota Education Association found that 40% of those involved in a technology project the association is conducting were located in sites where Internet access requires long distance toll calls. As result of these toll charges, where access is provided, it is utilized minimally, and rationed out in minutes to students.

Of course, ironically, it is often students in these remote areas who are among those with the most to gain from the potential of information technology.

We believe the current changes will provide access to many of these schools only if we utilize national benchmarks, or if the benchmarks are the costs of the higher populated, lower cost areas of that region or state. In addition, our experience shows that long

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distance toll calls to access the Internet continue to be a major deterrent to school use. These tolls must be adequately accommodated by receiving much greater weight in the matrix. Or, alternatively, specific mechanisms must be deployed to end or ameliorate the problem of toll calls to Internet nodes.

As educators we recognize that this new access will present both exhilarating opportunities and stimulating challenges. Your committed work can provide us with the tools, but it will be our task to make them optimally benefit the students and communities we serve. We trust that with your help we can improve the quality of education for students throughout our states.

Sincerely,

NEA-Alaska  
John Cyr, President  
Vernon Marshall, Executive Director

North Dakota Education Association  
Bill Lipp, President  
Joseph A. Westby, Executive Director

Montana Education Association  
Eric Feaver, President  
David Smith, Executive Director

South Dakota Education Association  
Elaine Roberts, President  
Lona Lewis, Executive Director

Idaho Education Association  
Monica Beaudoin, President  
Jim Shackelford, Executive Director

Wyoming Education Association  
Jean Hayek, President  
Debbie Campbell-Jackson, Ph.D,  
Executive Director

**nea**

NATIONAL EDUCATION ASSOCIATION

1201 16th Street, N.W.  
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The Honorable Reed E Hundt  
Chairman  
Federal Communications Commission  
1919 M Street NW Room 814  
Washington DC 20554



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December 16, 1996

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW, Room 814  
Washington, DC 20554



RE: CC Docket No. 96-45

Dear Chairman Hundt:

I am a school board member from Greenwood, SC School District #50. I am writing to thank you for your leadership, and the leadership of the Joint Board for their strong decision, to ensure that all schools will have affordable access to the Information Superhighway. I urge the FCC to fully adopt the recommendations of the Joint Board.

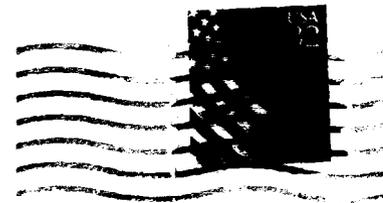
The discount range of 20 to 90 percent will ensure that all schools - even the poorest - have truly affordable access. The plan is also very flexible and will empower schools to select the services that work best for their educational mission. Including discounts on internal connections and Internet access is equally vital, and stands to bring services directly to the classroom where students learn.

We have done a very good job locally in getting our schools ready for the Internet. Most of the wiring is complete and a local grant has helped us purchase hardware and external connections to provide dial-up capabilities for the schools. One of our most outstanding needs at this point is to place more PCs with modems in the classrooms so that they can connect to the services. These reductions in fees for Internet access and other telecommunications services can be applied to meet these needs.

As you move ahead in your deliberation on this important issue, I urge you to seize the opportunity to bring 21<sup>st</sup> century learning to our school children.

Sincerely,

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Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW, Room 814  
Washington, DC 20554



# CAPSS

26 Caya Avenue  
West Hartford, CT 06110-1186  
(860) 236-8640 • (860) 236-8628 (FAX)  
e-mail CTCAPSS@aol.com

THE CONNECTICUT ASSOCIATION OF PUBLIC SCHOOL SUPERINTENDENTS, INC.

December 17, 1996

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, DC 20554

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Dear Chairman Hundt:

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The discount range of 20% to 90% will insure that all schools - even the poorest - have truly affordable access. The plan is also very flexible and will empower schools to select the services that work best for their educational mission. The inclusion of discounts on internal connections and Internet access is equally vital and stands to bring services directly to the classroom where students learn.

As you move ahead in your deliberation on this important issue, I urge you to seize this opportunity to bring 21<sup>st</sup> century learning to our schoolchildren.

Sincerely,



David H. Larson  
Secretary

dhl/ekn

cc: F. Yulo  
J. Cirusuolo

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New London

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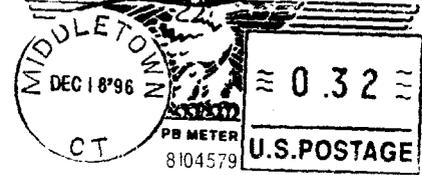
Executive Director  
Dr. Frank R. Yulo

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FEDERAL COMMUNICATIONS COMMISSION  
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The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, DC 20550

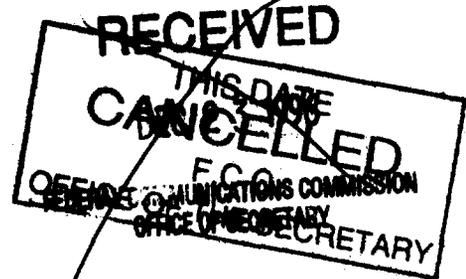
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DOCKET FILE COPY ORIGINAL

December 16, 1996

The Honorable Reed Hundt, Chairman  
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1919 M Street, NW, Room 814  
Washington, DC 20554



RE: CC Docket No. 96-45

Dear Chairman Hundt:

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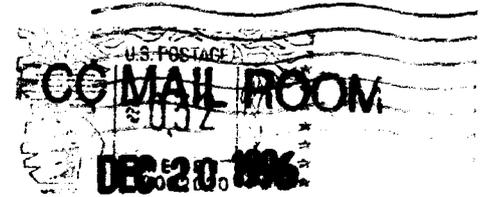
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As you move ahead in your deliberation on this important issue, I urge you to seize the opportunity to bring 21<sup>st</sup> century learning to our school children.

Sincerely,

Handwritten signature of Ken Moody.

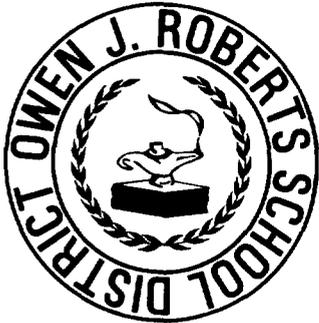
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Federal Communications Commission  
1919 M Street, NW, Room 814  
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# Owen J. Roberts School District

Administration Building  
901 Ridge Road, Pottstown, Pennsylvania 19465  
Telephone (610) 469-6261  
Fax (610) 469-0748

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The Honorable Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N. W., Room 814  
Washington, DC 20554

RE: CC Docket No. 96-45

Dear Chairman Hundt:

I am a school board member from the Owen J. Roberts School District and I would like to thank you for your leadership and the leadership of the Joint Board for their strong decision to ensure that all schools will have affordable access to the Information Superhighway. I urge the FCC to fully adopt the recommendations of the Joint Board.

The discount range of 20 to 90 percent will ensure that all schools – even the poorest – have truly affordable access. The plan is also very flexible and will empower schools to select the services that work best for their educational mission. The inclusion of discounts on internal connections and Internet access is equally vital and stands to bring services directly to the classroom where students learn.

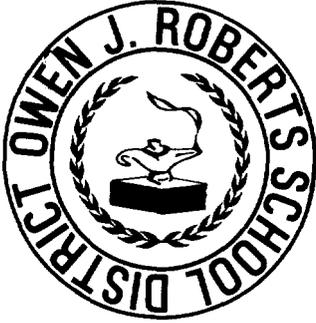
As you move ahead in your deliberation on this important issue, I urge you to seize this opportunity to bring 21<sup>st</sup> century learning to our schoolchildren.

Sincerely,

Karen L. Zelle

School Board Member

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# Owen J. Roberts School District

Administration Building  
901 Ridge Road, Pottstown, Pennsylvania 19465  
Telephone (610) 469-6261  
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December 13, 1996

The Honorable Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N. W., Room 814  
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RE: CC Docket No. 96-45

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As you move ahead in your deliberation on this important issue, I urge you to seize this opportunity to bring 21<sup>st</sup> century learning to our schoolchildren.

Sincerely,

A handwritten signature in cursive script that reads "John C. Kolla".

John C. Kolla  
School Board Member

**Owen J. Roberts School District**

Administration Building  
901 Ridge Road  
Pottstown, PA 19465-9314

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