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

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JAN 10 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Federal-State Joint Board on )  
Universal Service )  
 )

CC Docket No. 96-45

Public Notice on Recommended Decision (DA 96 1891)

**Reply Comments of the Benton Foundation**

Kevin Taglang  
Benton Foundation  
1634 Eye Street, NW  
Washington, DC 20006  
benton@benton.org

January 10, 1997

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## **I. Introduction**

In this Public Notice, the Commission and the Common Carrier Bureau seek further comment on recommendations of the Joint Board on Universal Service. Specifically, the Commission seeks comment on the additional principle of competitive neutrality, baseline federal support for low-income consumers, identifying support levels for schools and libraries, provisions for rural health care providers, and the administration of the universal service fund.

In a joint filing with the Center for Strategic Communications, the Benton Foundation ("Benton") focused its comments in this proceeding on two issues:

- the Commission should use the additional principle of competitive neutrality to begin defining the basic universal service package as the conduit that delivers services not as a set of narrowly defined services and
- the Commission should include the development of marketing strategies as part of the responsibilities of the new administrator of the universal service fund.

In our reply comments, Benton:

- files supporting letters for our proposed Universal Service Marketing Group
- points out the concerns in regards to marketing of other organizations filing comments in this proceeding
- addresses potential problems with relying on competing carriers to inform eligible recipients of support mechanisms
- asks the Commission to enhance the Joint Board's recommendations on mixed buying consortia; and
- alerts the Commission to the connection between this proceeding and Mass Media Docket # 87-268: the transition to Digital TV.

Benton believes that communications in the public interest, including the effort to connect all Americans to basic communications systems, is essential to a strong democracy. Benton's mission is to realize the social benefits made possible by the public interest use of communications. Benton bridges the worlds of philanthropy, community practice, and public policy. It develops and provides effective information and communication tools and strategies to equip and engage individuals and organizations in the emerging digital communications environment.

The Benton Foundation's Communications Policy Project is a nonpartisan initiative to strengthen public interest efforts in shaping the emerging National Information Infrastructure (NII). It is Benton's conviction that the vigorous participation of the nonprofit sector in policy debates, regulatory processes and demonstration projects will help realize the public interest potential of the NII. Current emphases of Benton's research include extending universal service in the digital age; the future of public service in the new media environment; the implications of new networking tools for civic participation and public dialogue; the roles of states as laboratories for policy development; and the ways in which noncommercial applications and services are being developed through new telecommunications and information tools.

Over the past two years, the Benton Foundation has commissioned a number of research papers on the subject of universal service and now hosts the World Wide Web's most comprehensive library of universal service and access documents.<sup>1</sup>

## **II. Marketing Universal Service Benefits**

### **A. Support for Benton's Proposed Universal Service Marketing Group**

In comments filed December 19, 1996, Benton proposed that the administrator of the new universal service fund ("USF") be charged with developing competitively neutral marketing strategies and to implement universal service marketing campaigns to make eligible individuals and institutions aware of the resulting support mechanisms.

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<sup>1</sup> See URL <http://www.benton.org/Uniserv/>

Benton proposed the creation of the Universal Service Marketing Group ("USMG") to work with the new USF administrator to recruit a qualified advertising agency to develop print, billboard, radio, television, and Internet advertising for the universal service program. The USMG would also work with existing national organizations with the information infrastructures to alert eligible constituencies of universal service support mechanisms. The USMG should be comprised of representatives from consumer groups, public interest advocates, state consumer advocates, as well as experienced marketing executives from the telecommunications industry.

Benton proposed the USMG as a competitively neutral way of addressing the need to market universal service programs to eligible individuals and institutions. The USMG would serve the public interest, convenience, and necessity of connecting eligible beneficiaries with the services outlined in the Telecommunications Act of 1996 and defined in these proceedings.

Since that filing, Benton has received letters of support via e-mail from a number of organizations and individuals. These letters are included in Appendix I.

#### **B. Other Commenters on Marketing Universal Service Benefits**

Benton agrees with comments filed by the Alliance for Community Media ("Alliance"). Alliance has "concerns that relying on trade and professional associations to alert schools to the availability of this program is inadequate, particularly when there are significant low-cost alternatives which will be equally effective." Benton believes a neutral and impartial administrator to be such a low-cost alternative by pooling resources into one, centralized campaign.

The United States Catholic Conference et al. ("Catholic Conference") also commented on marketing universal service benefits. The Joint Board recommended that states determine "whether to require carriers to provide free access to information about telephone service for low-income consumers."<sup>2</sup> The Catholic Conference points out that "a state rule will not ensure the same high level of information dissemination across the country." Benton agrees with these comments and proposes that information could be coordinated better and dispersed with better continuity by a central Universal Service Marketing Group.

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<sup>2</sup> Joint Board Recommendations at ¶ 390.

### **C. Carrier Ad Campaigns Often Attack Other Carriers and Confuse Consumers**

Some carrier campaigns aim to discredit other carriers and can result in heightened confusion for consumers. A recent example of carrier campaign wars is the case of AT&T and Telco Communications Group, Inc. The two companies have traded lawsuits to decide if Telco's promotional materials were true when they claimed significant discounts over AT&T rates.<sup>3</sup> Consumers are left to ask themselves, "Who can I believe?"

Low-income consumers and eligible institutions will need clear guidance about the existence of programs to assure their access and the options available to them. There is no guarantee that carrier ad campaigns will address these needs. Campaigns conducted by a Universal Service Marketing Group – coordinated with representatives from consumer groups, public interest advocates, state consumer advocates, federal and state telecommunications regulators, as well as experienced marketing executives from the telecommunications industry – would consider these needs their first priority.

### **III. The Commission Should Clarify Rules on Mixed Buying Consortia**

The Joint Board recommends that "state commissions undertake measures to enable consortia of eligible and ineligible entities to aggregate their purchases of telecommunications services and other services being supported through the discount mechanism, in accordance with the requirements set forth in section 254(h)."

However, the Joint Board rejects La Raza's suggestion that allowing community-based organizations providing educational, health, and literary services to receive the same full and equal access to advanced services as libraries and schools should be a principle that stems from either section 254(b)(6) or 254(b)(7) of the 1996 Act.

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<sup>3</sup> See Appendix II: Mike Mills, "AT&T, Va. Phone Company Trade Lawsuits Over Ads." p. B10. Washington Post. January, 3, 1997.

The Joint Board addresses this proposal with the following:

"We do not agree with La Raza that community-oriented organizations that provide services similar to those provided by schools and libraries should receive the discounts and benefits statutorily accorded to schools and libraries. The 1996 Act specifically defines the categories of institutions that are eligible for discounted telecommunications and information services, and we find no evidence that Congress intended this Joint Board or the Commission to supplement the 1996 Act's definition."<sup>4</sup>

Other commenters have reiterated the importance of extending universal service discount to community-based organizations.<sup>5</sup> The National Association of State Telecommunications Directors also filed comments stressing the value of large buying consortia. The Alliance comments point out that the Telecommunications Act of 1996:

does not explicitly or implicitly exclude any other entity from receiving any form of universal service support, and nothing in the legislative history of 1996 Act expressly prohibits entities such as PEG centers and community communications centers from receiving universal service assistance. The only entities that are expressly prohibited by the legislative history from receiving universal service funding are for-profit businesses and certain categories of schools and libraries.<sup>6</sup>

The Association of America's Public Television Stations state:

The Conference Report accompanying the Act specifically states that the "conferees intend that consortiums of educational institutions providing distance learning to elementary and secondary institutions be considered an educational provider" for purposes of Section 254(h)(5). Thus, it is very clear that Congress intended consortia of educational institutions providing distant learning services to be eligible for discounted rates.

Whatever the Commission decides is the intent of Congress, Benton proposes that the Commission recognize the benefits of lowering telecommunications operating expenses for community-based

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<sup>4</sup> See 47 U.S.C. § 254(h)(5)(C).

<sup>5</sup> See Alliance for Community Media, Association of America's Public Television Stations and Public Broadcasting Service, National Council of La Raza et al, National Urban League, SBC Communications, Inc., and the Universal Service Alliance.

<sup>6</sup> See H.Rep. 104-458, 104th Cong., 2d Sess.(Telecommunications Act of 1996 Conference Report) (Jan. 31, 1996) at 133:

New subsection (h)(4) specifies that the following entities are not eligible to receive discounted rates under this section: for-profit businesses, elementary and secondary schools with endowments of more than \$50,000,000, and libraries that are not eligible to participate in Statebased applications for Library Services and Technology Funds.

organizations such as community computing centers, PEG access centers, nonprofit technical assistance providers, community economic developers, distance learning and library consortia, low-income constituency human services organizations, and the like. Each of these organizations could help advance the deployment of telecommunications services to every community in the nation. Benton suggests the Commission enhance the recommendations of the Joint Board and clearly define strategies to either extend universal service subsidies to these organizations and the low-income constituencies they serve or to outline a plan for schools, libraries and rural health care providers to enter into mixed buying consortia. The language of the recommended decision is inadequate in that it relies on state commissions to undertake measures to enable consortia of eligible and ineligible entities to aggregate their purchases. The Commission should provide clear language that:

- defines a mixed buying consortium and what entities will be eligible to participate. What boundaries will define these consortia – will they be limited by geographic interest or community of interest?
- outlines potential benefits for schools, libraries, and rural health care providers. Now that these entities know what their discounts will be, what incentives will they have to enter partnerships with noneligible entities?
- addresses what incentives there are for vendors to provide volume discounts off current or future access facility rates. If margins are already slim on access facilities and some vendors are losing money on access (particularly when they move to "all you can eat" rates) can competition really do much?
- encourages eligible entities to involve the broader community in the process. The Universal Service Alliance encourages the Commission to ask schools and libraries to involve their communities in technology plans and implementation.<sup>7</sup> Benton and the George Lucas Foundation made a similar point in "After Net Day must be 'Next Day.'"<sup>8</sup>

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<sup>7</sup> See Universal Service Coalition comments at IV.

<sup>8</sup> See Appendix III: Andrew Blau and Patty Burness, "After Net Day must be 'Next Day.'" The Tampa Tribune. October 25, 1996.

How can mixed buying consortia and the discount plans for schools and libraries revitalize these institutions as community centers?

#### **IV. Connection Between This Proceeding and Mass Media Docket # 87-268**

Benton notes the irony that reply comments in both this proceeding and Mass Media Docket # 87-268 were originally both due today, January 10. As an active participant in both proceedings, Benton reminds the Commission to be mindful of the ever-changing communications landscape. Parties not responding in these proceedings may soon be major players in telephony. When broadcasters adopt digital broadcast technology, they will be able to deliver a number of non-broadcast services to consumers. Broadcasters could become multi-channel operators, wireless telephony providers, and/or Internet service providers. And, as an Internet service provider, the broadcaster could deliver telephony, video, audio, and data. Will we continue to regulate "television" – which could be hardware that serves the function of a TV, phone, fax, pages, and computer – through the Mass Media Bureau when it delivers functions regulated by the Common Carrier and Wireless Bureaus as well? How will regulators respond to the shrinking differences between the telephone carrier and the television carrier when the latter can provide the function of the former? What universal service obligations might a broadcaster adopt when it begins to become a conduit for telephony?

The Commission should move away from a universal service system that focuses on services and move towards a system defined by transport and termination requirements. Transport requirements concern the quality and capacity of telephony media<sup>9</sup> (such as single-party service or being capable of providing fax/data service at specified speeds) and the distribution of those media (anti-redlining provisions, for example). Termination requirements mandate carriers to connect a user with a specified destination on demand (for example, equal access to interexchange carriers). In so doing, the Commission adopts policies without either specifying or implying specific facilities, architecture, or network topography and the carriers that are traditionally associated with those elements.

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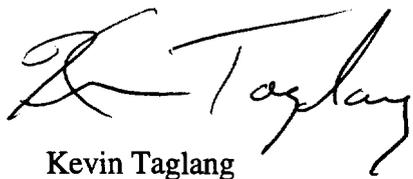
<sup>9</sup> Phone lines, spectrum, etc.

## V. Conclusion

Benton suggests that the Commission consider competitive neutrality when planning for the marketing of universal service support for both individuals and organizations. A neutral and impartial independent body affiliated with the universal service fund administrator and working with national and local organizations could best alert eligible constituencies of universal service support mechanisms.

Benton strongly urge the Commission to whole-heartily adopt the additional principle of competitive neutrality. In this and future proceedings, the Commission should be identifying certain elements – such as transport and termination requirements – that make up the definition of the basic universal service package. The Commission should avoid identifying the basic package as a narrow set of services with their implications of certain carriers, networks and/or topography.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Kevin Taglang". The signature is written in black ink and is positioned above the printed name.

Kevin Taglang

**Appendix I**

**Letters of Support for**

**Universal Service Marketing Group**

Date: Thu, 19 Dec 1996 16:28:58 -0500 (EST)  
X-Sender: Mawebber@eastnet.educ.ecu.edu  
Mime-Version: 1.0  
To: benton@benton.org  
From: Mawebber@eastnet.educ.ecu.edu (Carroll Webber)  
Subject: Supporting Benton's comments

You may use my name in support of Benton's comments to the Federal Communications Commission on the recommendations of the Joint Board on Universal Service, by forwarding this message or otherwise. I would tend to give especial emphasis relative to maximizing assurance that those eligible for support are informed of their eligibility.

Carroll Webber  
610 S. Elm St.  
Greenville, NC 27858-2824  
(919)758-4906

Date: Fri, 10 Jan 1997 14:30:42 -0500 (EST)  
X-Sender: Mawebber@eastnet.educ.ecu.edu  
Mime-Version: 1.0  
To: benton@benton.org  
From: Mawebber@eastnet.educ.ecu.edu (Carroll Webber)  
Subject: Marketing universal service

To whom it may concern:

A very sad thing, over the past two decades, has been knowing that a very sizable fraction of families eligible for food stamps in Pitt County has remained ignorant of their eligibility; our County Health Department has found related serious malnourishment.

I hope that this phenomenon, of eligible people not knowing of programs to help them, will be minimized with respect to universal service. Benton Foundation has much experience in this field, and has an important proposal which could help.

Carroll Webber  
610 S. Elm St.  
Greenville, NC 27858  
(919)758-4906

From: CommProf@aol.com  
Date: Thu, 19 Dec 1996 18:27:19 -0500  
To: benton@benton.org  
Subject: Support for Benton Comments

I support your comments for FCC service policies.  
Please enroll me in policy papers list:  
subscribe benton-compolicy commprof@AOL.com  
John M. Phelan, PhD  
Professor and Director  
McGannon Communications Research

Date: Wed, 8 Jan 1997 19:03:45 -0600 (CST)  
X-Sender: strategc@bucky.win.bright.net  
Mime-Version: 1.0  
To: benton@benton.org (Benton Foundation)  
From: DJ Shrader-Smith <Strategc@win.bright.net>  
Subject: Re: Universal Service Proceeding

Please include me in the subject. I support the marketing plans and have extensive experience with a worldwide Fortune 500 company for fifteen years if I can be of assistance.

DJ

At 05:32 PM 1/8/97 -0500, you wrote:

>On December 19, the Benton Foundation and the Center for Strategic  
>Communications filed comments at the Federal Communications Commission  
>outlining a plan to guarantee that eligible recipients of universal service  
>support are informed of their eligibility. Benton believes that the worst  
>of all possible universal service scenarios is the creation of explicit,  
>competitively neutral support mechanisms that go unused because eligible  
>recipients remain unaware of them.

>

>Benton is proposing that the administrator of the new universal service  
>fund also be charged with developing competitively neutral marketing  
>strategies and to implement universal service marketing campaigns to make  
>eligible individuals and institutions aware of the resulting support  
>mechanisms. Benton's plan calls for a collaborative effort between  
>representatives from consumer groups, public  
>interest advocates, state consumer advocates, as well as experienced  
>marketing executives from the telecommunications industry.

>

>To find out more about Benton's plan to market universal service support  
>mechanisms, see our comments posted at  
><http://www.benton.org/Policy/96act/recomments.html>

>

>To support our proposal, send an e-mail message to benton@benton.org before  
>January 10. Your support will be included in our next set of comments to be  
>filed this Friday.

>

>Benton Foundation -- Communications in the Public Interest

>

>\*\*\*\*\*

>Benton Foundation  
>1634 Eye Street NW, 12th Floor  
>Washington, DC 20006-4006  
>phone: 202-638-5770  
>fax: 202-638-5771  
>benton@benton.org  
><http://www.benton.org>

>To join the Benton Communications Policy Mailing List, send the following  
>command in the body of your message to benton-request@cdinet.com:

> subscribe benton-compolicy youremail@host.domain  
> (for example, subscribe kevint@benton.org)

>

>

>

>

Posted-Date: Wed, 8 Jan 1997 22:53:36 -0600 (CST)  
Mime-Version: 1.0  
Date: Wed, 8 Jan 1997 22:54:33 -0500  
To: Benton Foundation <benton@benton.org>  
From: johnk@visi.com (John Kalbrener)  
Subject: Re: Universal Service Proceeding

I fully understand, agree with and support the Benton Foundation's stand on the issue of Universal Service and wish my opinion and support to be expressed wherever and whenever the Benton Foundation wishes.

>...the worst of all possible universal service scenarios is the creation  
>of explicit, competitively neutral support mechanisms that go unused  
>because eligible recipients remain unaware of them.

>

>Benton is proposing ... \*competitively neutral\* marketing strategies and  
>to implement universal service marketing campaigns to make eligible  
>individuals and institutions aware of the resulting support mechanisms.

Further, I propose that the participation of "marketing people" in this effort be limited to their role(s) as helpers for Benton Foundation supported individuals and groups, as distinct from merely marketing per se and/or marketing which is influenced and/or controlled by profit-oriented interests.

John Kalbrener  
3rd Thought Collaborations  
612-861-6685 & 866-3090  
6600 Logan Avenue South  
Minneapolis, Minnesota 55423  
<http://www.visi.com/~johnk/>  
We are all each others' teachers

Date: Wed, 8 Jan 1997 16:02:18 -0800 (PST)  
From: Carol J Callen <cjc@sff.org>  
To: benton@benton.org  
Subject: support for proposal re: universal service  
MIME-Version: 1.0  
Sender: cjc@sff.org

I am writing in support of the Benton plan to market universal service support mechanisms.

Sincerely,

Carol J, Callen, J.D.

Date: Thu, 09 Jan 1997 10:30:47 -0500  
From: "Richard & Theresa A. Parkany" <rparkany@borg.com>  
Reply-To: rparkany@borg.com  
Organization: Prometheus Educational Services  
MIME-Version: 1.0  
To: Benton Foundation <benton@benton.org>  
Subject: Re: Universal Service Proceeding

Ladies & Gentlemen: we at \*The Latimer Education Program\* a direct service provider of Carver Community Center, Inc.; Schenectady, NY support Benton Foundation's and the Center for Strategic Communications comments filed on 19Dec96 at the FCC summarized below. Latimer directs 3 public access Community Technology Centers in Sch'dy, NY and is an affiliate member of EDC, Inc's. CTCNet. Latimer and it's cohort partners presently provide public access to computer & information services for several hundred families in the city who would otherwise not have such access due to poverty and limited family resources. Every item in these comments would not only ensure the present level of such services in Schenectady, but greatly enhance Latimer's strategic plan to expand these services locally, regionally and statewide through our efforts w/CTCNet. These items are indispensable for the continued success of our efforts here. Thank you for your consideration.

Benton Foundation's and the Center for Strategic Communications' comment summary:

On December 19, the Benton Foundation and the Center for Strategic Communications filed comments at the Federal Communications Commission outlining a plan to guarantee that eligible recipients of universal service support are informed of their eligibility. Benton believes that the worst of all possible universal service scenarios is the creation of explicit, competitively neutral support mechanisms that go unused because eligible recipients remain unaware of them.

Benton is proposing that the administrator of the new universal service fund also be charged with developing competitively neutral marketing strategies and to implement universal service marketing campaigns to make eligible individuals and institutions aware of the resulting support mechanisms. Benton's plan calls for a collaborative effort between representatives from consumer groups, public interest advocates, state consumer advocates, as well as experienced marketing executives from the telecommunications industry.

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"This generation shall not end until all things have come to pass..."

Richard & Theresa A. Parkany           % Prometheus Educational Services  
e-mail: rparkany@borg.com            WEB: <http://www.borg.com/~rparkany>  
  Utica, NY; USA

Date: Thu, 9 Jan 1997 08:14:02 -0500 (EST)  
X-Sender: bonnie@gateway.cincyzoo.org  
Mime-Version: 1.0  
To: benton@benton.org  
From: Bonnie Kroeger <bonnie.kroeger@cincyzoo.org>  
Subject: Universal Service

The Cincinnati Zoo and Botanical Garden supports the Benton Foundation's proposal to require the administrator of the new universal service fund to take the necessary steps to insure that potential eligible recipients are made aware of the program through a competitively neutral marketing strategy and outreach.

Bonnie Kroeger  
Director, Grants Development  
The Cincinnati Zoo and Botanical Garden

X-Sender: dsimm@winslo.ohio.gov
Mime-Version: 1.0
Date: Thu, 09 Jan 1997 10:07:41 -0800
To: benton@benton.org
From: Dave Simmons <dsimm@winslo.ohio.gov>
Subject: Universal Service Proceedings

I have just read the proposed plan regarding establishing competitive neutrality in marketing any universal service initiative sponsored by the FCC in the Telecommunications Bill of 1996.

I heartily endorse the idea of a neutral body conducting the marketing campaign of universal service for telecommunications. As the director of a rural library cooperative in a designated Appalachia area, we have several small phone companies who have no interest in developing marketing campaigns encouraging discounts for schools and libraries. Libraries and schools would lose out on such discounts through neglect of information-sharing.

Ohio has currently 43 phone companies in the state, 250 public libraries (with 700 public service outlets) and over 400 school districts. Coordinating a consistent message to all and from all of these facilities would need some sort of neutral body to coordinate the effort.

Universal service is valuable and necessary to assure that all citizens are information literate and remain connected to the world in an interactive manner. Universal service for telecommunications assures that communities are connected, much like roads; that a certain degree of interactivity is achieved (so that every voice can be heard); and that people can use such services to improve the quality of their lives.

Many thanks to the Benton Foundation for your support of universal service at discounted rates for such public outlets as libraries and schools. Your efforts in policy development in achieving discounted rates will assure that every community will be "information-haves" regardless of the communities they live in, the educational levels they have achieved, or the income level they maintain.

\*\*\*\*\*
Dave Simmons dsimm@winslo.ohio.gov
Executive Director http://www.molo.lib.oh.us
MOLO Regional Library System 330/364-8535
New Philadelphia, OH 44663
\*\*\*\*\*

From: AAMGCW01@asnaam.aamu.edu  
Date: Thu, 9 Jan 1997 10:43:56 -0600 (CST)  
To: benton@benton.org  
CC: AAMGCW01@asnaam.aamu.edu  
Subject: Unversal Services marketing proposal

In working with rural clients in Alabama, there is great interest but a lot of confusion. Bell South and local telephone companies are busy with other priorities. The Benton proposal should help.

Gerald WHeelock, Professor  
Department of Agribusiness  
Alabama A & M University  
Normal, AL

(205) 851-5410

Date: Thu, 09 Jan 1997 12:13:12 -0600  
From: David Dring <dDring@ianet.org>  
Reply-To: dDring@ianet.org  
Organization: The Interactive Aging Network  
MIME-Version: 1.0  
To: benton@benton.org  
Subject: Support of of Comments

The Interactive Aging Network, a non-profit resouce consultancy to aging service providers, supports the comments made.

Date: Thu, 9 Jan 1997 16:04:32 -0800 (PST)  
From: Carol J Callen <cjc@sff.org>  
To: Benton Foundation <benton@benton.org>  
Subject: Re: Universal Service Proceeding  
MIME-Version: 1.0  
Sender: cjc@sff.org

I am writing in support of your plan for marketing universal service support mechanisms.

Sincerely,  
Carol J. Callen, J.D.

From: BCampbl1@aol.com

Date: Thu, 9 Jan 1997 19:54:22 -0500 (EST)

To: benton@benton.org

Subject: No Subject

As a central office administrator in charge of technology for Plainville Community Schools In Connecticut and as a personal consumer of communication media, I support yur ideas of stakeholder collaboration and a third-party administrator in charge of developing competitively neutral marketing. Congratulations on great forward thinking!  
Barbara Campbell

From: wrolley@garlic.com  
Mime-Version: 1.0  
Date: Thu, 09 Jan 97 16:39:57 +0800  
To: benton@benton.org  
Subject: Universal Service

I have sent a previous note, but had an connection error reported. This may be an approximate duplicate.

I strongly support the Benton Foundation position on Universal Service. I have worked extensively with non-profit organizations to improve digital literacy in segments of the population that are not otherwise being served. I am also an Internet Site Developer.

In both roles, I feel that it is important the we try to ensure that the correct services are made generally available, and not very important whether these come from one technology or another. Attempts to regulate "Television" or "Telephone" services to provide the services will end up with confusion and delay while the need grows.

Wes Rolley

The Digital Clubhouse Network

AND

wrolley@garlic.com  
Reflections Publishing, Inc.

CrossPlatform Creativity  
CrossPlatform Multimedia Development