

would have the option of applying this credit to pay for regular dial-up access to an internet provider or establishing a direct link. Furthermore, the method of connection, via telephone line, wireless or other mechanism should be the choice of the consumer - the rural health provider. Of course, eligibility should be based on the lack of a local "Point Of Presence" for an internet service provider.

Eligible Institutions

The Act defines the term health care provider but there is some remaining uncertainty about extending benefits of this section to urban health care providers serving persons who reside in rural areas of a State. We urge the Commission to enable urban providers to benefit from the provisions established by the Commission for services they provide directly to rural areas. For example, if an urban-based health center establishes a telemedical link to a rural health institution then the telecommunications costs for such services should be considered covered under the forthcoming Report and Order.

In conclusion, we commend you, the other members of the Commission and the Commission staff for the genuine concern, commitment and professionalism that have been demonstrated in responding to the provisions in the Act related to health care communications. I and the other members of ATA look forward to a positive outcome of these proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay H. Sanders". The signature is fluid and cursive, with the first name "Jay" being the most prominent.

Jay H. Sanders, M.D.
President

cc: Commissioner Rochelle Chong
Commissioner Susan Ness
Commissioner James Quello
William F. Caton, Secretary to the Commission

1301 Pennsylvania Avenue, NW
Suite 403
Washington, DC 20004-1701
USA

Telephone 202 628 8421
Fax 202 628 8424
E-mail: oitp@alawash.org
<http://www.ala.org/oitp/>

Office for Information
Technology Policy

ALAAmericanLibraryAssociation

FAX TRANSMITTAL

To: Daniel Gonzalez, Office of Commissioner Rachelle B. Chong
Fax: 202/418-2820
From: Andrew Magpantay 
Re: latest filing re: one-mile issue
Date: April 29, 1997
Pages: six, including this cover sheet.

Mr. Gonzalez:

Thank you and Commissioner Chong for taking the time to meet with the EdLinC coalition yesterday. Here is a copy of the American Library Association's latest filing regarding the one-mile issue. If you have any further questions, please give me a call.

1301 Pennsylvania Avenue, NW
Suite 403
Washington, DC 20004-1701
USA

Telephone 202 628 8421
Fax 202 628 8424
E-mail:oitp@alawash.org

**Office for Information
Technology Policy**

ALA American Library Association

April 25, 1997

Mark Nadel
Federal Communications Commission
2100 M Street, N.W.
8th Floor
Washington, DC 20554

SEARCHED

MAY 1 1997

Re: Ex Parte Presentation
CC Docket No: 96-45, Federal-State Joint Board on Universal Service

Dear Mr. Nadel:

Regarding your request for information on the use of poverty information to determine the size of library universal service discounts. I spoke with Dr. Keith Lance, Director, Library Research Service, Colorado Department of Education about the use of a one mile radius in estimating the poverty level for a library's service area. He referred me to two works by Dr. Christine Koontz at Florida State University's Florida Resources and Environmental Analysis Center. (This is the same center that produced the earlier information on poverty distribution submitted in ALA's January 10, March 17, and April 4 ex parte filings related to this matter.) According to Dr. Lance, Dr. Koontz's work does substantiate the validity of using a one-mile radius in conjunction with GIS software for the purposes of estimating poverty level for a library's service area. I include the two relevant citations by Dr. Koontz below:

Christie Koontz, Using Geographic Information Systems for Estimating and Profiling Geographic Library Market Areas, in GEOGRAPHIC INFORMATION SYSTEMS AND LIBRARIES: PATRONS, MAPS AND SPATIAL INFORMATION. PROCEEDINGS OF THE 1995 CLINIC ON LIBRARY APPLICATIONS OF DATA PROCESSING (Linda C. Smith & Myke Gluck eds., 1995)

Abstract: A definition of legal service or market area is difficult for public library management due to limited available data regarding user residence, and because people may cross service lines for any number of reasons. Yet an accurate estimate and a subsequent socioeconomic profile of the geographic market to be served (market analysis) is essential in order to provide unique community-based services and materials. Geographic information system (GIS) software can facilitate library market analysis by graphically estimating geographic boundaries and analyzing socioeconomic characteristics within prescribed markets in one online environment. This discussion illustrates the utility of GIS in estimating and profiling library markets. The Evansville-Vanderburgh County public library system is used to provide realistic library market analysis situations.

CHRISTINE M. KOONTZ, *LIBRARY FACILITY SITING AND LOCATION HANDBOOK* (Greenwood Library Management Collection, Greenwood Publishing Group, forthcoming May 1997).

An earlier article by E. Susan Palmer, "The Effect of Distance on Public Library Use: A Literature Survey," in the Winter 1981 *Library Research*, pages 315-354, states that a one-mile radius was suggested as a service radius as early as 1911 and was set as an optimal distance for service in urban libraries by the American Library Association's publication *Post-War Standards for Public Libraries* (1943).

This one-mile radius was used as a uniform standard by which to construct the suggested library universal service discount matrix submitted in the ALA ex parte filings mentioned above. This one-mile radius was chosen because it provided a national, uniform, reproducible, standard which had an historical precedent that could be used in constructing a discount matrix that conformed to the Joint Board's Recommendation. As stated in ALA's previous filings, libraries already have or are able to obtain more complete poverty information reflecting their entire service area.

Thank you for all your hard work on this issue and please let me know if I can be of any further assistance on this issue.

Sincerely,



Andrew Magpantay
Director
Office for Information Technology Policy
American Library Association

CC: William Caton
Acting Secretary
Federal Communications Commission

LIBRARY RESEARCH 3 (313-354) (1981)

REVIEW ARTICLE No. 4 Winter 1981

The Effect of Distance on Public Library Use: A Literature Survey*

E. SUSAN PALMER

*Graduate School of Library and Information Science
University of California, Los Angeles, CA 90024*

CONTENTS

- I. INTRODUCTION 316
- II. HISTORICAL PERSPECTIVE 316
- III. CURRENT TRENDS 318
- IV. DISTANCE AND THE LIBRARY USER 319
 - Mode of Travel
 - Elasticity of Demand
 - Shopping Patterns
 - Community Awareness
 - User Characteristics
 - Library Spacing
 - Equity
- V. PUBLIC FACILITY LOCATION THEORY 343
 - Central Place Theory
 - Distributed Goods
 - Travelled-for Goods
 - Gravity Models
 - Elastic Demand Models
- VI. CONCLUSION 346
- VII. REFERENCES 347

I. INTRODUCTION

The relationship between man and his spatial environment is an intricate one. An individual is likely to use facilities located within his/her normal range of travel. However, efforts to provide services within the range of all possible users may result in inadequate provision of resources at each dispersed location.

Library administrators have long recognized this need for a balance between convenience to the user and provision of adequate service. Over the years, surveys of library users have indicated the limits of local constituencies. Parallel observations have been made in a host of other fields, from the definition of residential choice in relation to the journey to work, to shopping pattern observations, and choice of leisure activities (Haggett et al., 1977). Some of the models derived from these fields of study have been applied to the library situation (Buckland, 1978; Elton and Vickery, 1973; Hamburg et al., 1974; Kantor, 1979). However, the wealth of resources available in the public facility planning literature remains largely untapped. A consolidation of the literature representing the librarian's practical experience and the planners' theoretical expertise would facilitate understanding of the complex role distance plays in library use.

II. HISTORICAL PERSPECTIVE

The physical structures which house our libraries present both a challenge and a constraint. Their present sites and condition affect future development, while their form of construction and pattern of distribution are rooted in concepts of the past. A brief examination of trends in library location theory provides a basis for understanding the present situation.

In the 1870s, an analysis of applications for registration convinced the Board of Trustees of the Boston Public Library that "inconvenience of access to the Central Library deprived the people of East Boston of their natural use of that great collection" (Greenough, 1871). As a result, the East Boston branch became America's first formal branch library (Carroll, 1966). By the turn of the century, the American Library Association's *Manual of Library Economy* had this recommendation: "... the city which provides branch libraries not more than a mile apart is not in danger of overdoing its library facilities; while in densely populated parts of large cities two or three times as many branches may be needed" (Eastman, 1911).

The 1912 Annual Report to the Board of Trustees of the Chicago Public Library offered this comment concerning their recent branch acquisitions:

It is to be regretted that the extension could not be carried out pursuant to a carefully mapped plan based on population, well-defined districts, and other factors which should control. Instead, perforce, the branches have been located as offered. . . (Chicago Public Library, 1916, p. 5).

Four years later, the city approved a bond issued later considered "a landmark in library history" (Joeckel and Carnovsky, 1940, p. 41). Its goal was to supply "library service within walking distance of home for every person in the City of Chicago who can read or wants to use books" (Chicago Public Library, 1916, p. 3).

By 1927, an ALA survey numbered among Class A library systems (100,000 volumes or more): 7 systems with branches less than 1/2 mile apart on an average, 11 systems within the 1/2-1 mile range, and 6 additional systems with branches under 1 1/2-miles apart (American Library Association, 1927). Florence Goodenough (1926) evaluated the impact of these building efforts in her statistical analysis of library services among major U.S. libraries. She found that accessibility was second only to funding as a key factor effecting library circulation. For example, Columbus, Ohio's single library served a population of 268,000 and averaged 1.11 volumes per capita circulation. In contrast, Cleveland, Ohio had multiple branches, each serving an average of 16,000 people with an average circulation of 6.54 volumes per capita.

On a local level, examination of registration and circulation records was evolving as an evaluative tool. Pilcher (1923), Jones (1926), and Horowitz (1933) presented landmark surveys of system-wide use, while Potviet (1928) and Wert (1937) focused on individual branches. Douglas Waples (1932), in an investigation designed to determine the reading interests most closely associated with library usage, discovered that proximity to a branch had a greater influence on patronage levels than any specific subject interest. Laurel Krieg (1939) corroborated this, noting that 55 percent of the patrons surveyed lived within 10 blocks of the library. A user study by Gray and Monroe (1929) noted that accessibility was a definite factor in book use. The authors pointed to the success of the County Library Service in California as support for the theory that accessibility increases consumption. Evans (1976) details a number of surveys in his history of community analysis.

One mile, a distance suggested by Eastman in 1911, was accepted as an early service radius (McDiarmid, 1940). The American Library Association, *Post-War Standards for Public Libraries* (1943) set 1-mile limits for optimal service in urban library systems. In Britain, this became "pushing distance" in Library Association literature (Library Association, 1952). Grundt (1968) noted that the distribution of libraries in Boston is such that a library branch is less than 1/2 mile from most homes.

2026288424: # 3

LIBRARY PERSONNEL

APR 25 07 11:09AM

SENT BY:

2026288424

AMERICAN LIB-ASSOC

051 P05

APR 29 '97 13:08

These close-spacing policies gradually encountered resistance. The report of the Los Angeles Bureau of Budget and Efficiency (1949) clearly represents this counter-trend. Their survey indicated that a majority of patrons drove to the library, some travelling as much as 10 miles for service. With such obvious mobility, they concluded, it would be more economical if a district consolidated its facilities. Considerable economy of scale would result, and the resulting larger collections would offer more variety to patrons.

This argument was strengthened considerably with the publication of the massive Public Library Inquiry (Berelson, 1949; Leigh, 1950). Their recommendation for consolidation was echoed by the library location prophet of the 1950s and 1960s, Joseph Wheeler. The Wheeler doctrine stressed the importance of attractive buildings, business and shopping center locations, and extensive consolidation of services (Wheeler, 1958, 1967). His empirical approach, with emphasis on learning from the mistakes of the past, fostered a burgeoning of evaluative location literature (Bertram, 1963; Freestone, 1976; Freestone, 1978; Vance, 1960).

At a recently held symposium (Galvin, 1976) many of the topics discussed related to the public's perceived awareness of the library and the convenience of the journey there. Awareness was characterized by the relative "visibility" of the library in the community, by its association with other commercial and service institutions and by the image evoked by the surrounding neighborhood. Perceptions of convenience were influenced by the terrain, both natural and man-made barriers, presence or absence of long stairways, availability of parking space, hazardous traffic conditions, etc.

Observations of this type, while significant, tend to focus on the site itself rather than on the public served. Dunstan (1977) notes that many library location studies start with the assumption that the library must be placed on available public land. This disregards the location's effect on use. Potential user access should be considered as the governing factor, location as the variable.

III. CURRENT TRENDS

Concern for the immobile patron has become an increasingly significant topic in the last decade. Martin (1969), Arthur D. Little and John S. Boiles (1970), and Healy et al. (1980) recognize the need to maintain services at seemingly inefficient branches which serve mainly the young, the poor or the elderly. Keith Doms (1967, pp. 931-932) noted that

for far too many years, public library planning and development has been derived from a mysterious essence seemingly comprised of one part intuition, one part information, and one part assumption. Admittedly, while this formula has produced many good decisions, one wonders

how many would have been better if one had possessed a fuller knowledge of the user and the nonuser. . . . What kinds of patrons need what kinds of materials? What are different use patterns in different clientele areas? While there have been useful studies . . . in (the library's) relationship to the needs of large groups of disadvantaged persons, we are still confronted with major premises such as the well-established and pervasive point of view that quality of service is improved primarily through provision of fewer but larger units. . . . Only recently several colleagues have suggested that perhaps we should resort to older patterns of service that have worked and that we ought to plan programs appropriate to the needs of the immobile as well as for those who are highly mobile.

Recent periods of fiscal austerity have led library administrators to consider consolidation of services (Getz, 1980). While consolidation may be economically advantageous, care should be exercised to consider the impact of closures on the particular patron groups involved. The library's public should be considered in terms of differing levels of motivation toward library use (Consad Research, 1968).

The following section will consider the relationship between the distance separating an individual from a library and the use that individual makes of the library. After the library user has been characterized, a public facility modelling theory will be discussed briefly in relationship to library location. Equity, "fairness, impartiality or equality of service" (Savas 1978, p. 802) will be discussed in conjunction with decisions involving the opening of new branches and the closing of existing facilities.

IV. DISTANCE AND THE LIBRARY USER

One means of examining the effect of distance as a deterrent to library use: to analyze the use of libraries in rural or poorly served areas. Hodgson (1946) concludes that library use in non-served areas of rural Indiana is limited to a core population (under 5% of all residents) that has sufficient interest in libraries to visit them during their trips to town. Schuler and Turbeville (1948) observe that less than 10 percent of Michigan farmers living over 5 miles from a site take advantage of library services. Chandler and Croteau (1940) indicate that a heavy concentration of users on Prince Edward Island live within a mile of a library. Luckham (1973) observes similar concentration of users within a 1-mile radius in several English towns. Studies of extended library systems (Colorado Market Research 1974; Elrick and Lavidge, 1977; National Educational Resources Institute 1972) show somewhat lower percentages of patrons within the first mile. However, the majority of users reside within a five-mile radius.

Linear distance from a geographic location may not give an accurate representation of the relative land areas involved in a survey (Bennett and Smith, 1975). A system of normalization, whereby user attendance may be

2026288424# 4

LIBRARY PERSONNEL

4 25 97 11:10AM

SENT BY

2026288424 AMERICAN LIB-RESSOC

051 P06

APR 29 '97 13:09

=== COVER PAGE ===

TO: _____

FAX: 12024182820

FROM: LOWCOUNTRY PEDS

FAX: 8035240425

TEL: 8035245437

COMMENT:

LOWCOUNTRY PEDIATRICS, P.A.
Pediatric and Adolescent Medicine
 964 Ribaut Road, Suite 1
 Beaufort, SC 29902
 (803) 524-5437

April 22, 1997

RECEIVED

MAY 1 1997

Federal Communications Commission
Office of Secretary

The Honorable Rachelle B. Chong
Commissioner
Federal Communication Commission
 1919 M Street, N.W., Room 814
 Washington, D.C. 20554

Re: CC Docket No. 96-45

Dear Commissioner Chong,

As a school board member and an advocate for children in Beaufort, S.C., I would like to voice my support for the Telecommunications Act and the Federal-State Joint Board discount plan currently being presented to your commission.

The benefit of this plan to our educational system, to our individual schools, and most importantly to our students is certainly apparent. This plan is a solid investment in the future of our children and, therefore, our society.

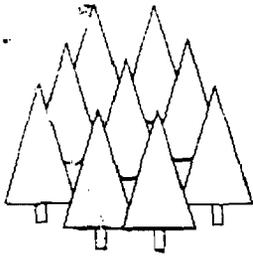
Thank you for your considerations.

Sincerely,



Dr. Joseph Floyd

JF/bd



WHERE KNOWLEDGE GROWS

SYLVAN UNION SCHOOL DISTRICT

605 Sylvan Avenue • Modesto, California 95350 • (209) 574-5000 • FAX (209) 524-2672

April 24, 1997

EX PARTE OR LATE FILED

RECEIVED

MAY 1 1997

Federal Communications Commission
Office of Secretary

MICHAEL W. SIBITZ
Superintendent

Rachelle B. Chong, Commissioner
Federal Communications Commission
1919 M. Street, N.W., Room 844
Washington, D.C. 20554

RE: CC DOCKET NO. 96-45

BOARD OF TRUSTEES

MARGERY NEDER
President

CYNTHIA LINDSEY
Clerk

MARSHA B. WAGGONER
Member

GARY R. VANCE
Member

STEPHEN L. STROUD
Member

Dear Commissioner Chong:

I am writing to you in regards to the federal "E-Rate" Telecommunications Discount Program. I am a locally elected school board member from Sylvan Union School District, Modesto, California, and I would like to express my strong support for this program and the proposed regulations governing its implementation.

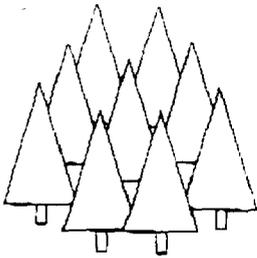
The Telecommunications Act of 1996 and the Federal-State Joint Board discount plan will guarantee that even the poorest schools will have access to the Internet and the ability to provide distance-learning opportunities. The \$2.25 billion a year will address the needs of schools across the country, and more importantly, the plan will bring telecommunications services directly to the classrooms, where they can have the greatest impact on students. It is important to remember that each element of this plan is vital to the overall success of the discount program. Therefore, the inclusion of discounts for internal classroom connections should not be eliminated, nor should the size of the Universal Service Fund be reduced. As I am sure you are aware, this program is essential for preparing our students to enter the workforce of tomorrow.

The E-Rate Telecommunications Discount Program is desperately overdue and our students need these discounts for telecommunications services this year. I urge you and the other FCC commissioners to fully support the recommendations of the Joint Board and approve the proposed final regulations regarding the discount plan for universal service for schools and libraries.

Thank you for your consideration of this matter.

Sincerely,

Margery Neder, President



WHERE KNOWLEDGE GROWS

SYLVAN UNION SCHOOL DISTRICT

605 Sylvan Avenue • Modesto, California 95350 • (209) 574-5000 • FAX (209) 524-2672

****FAX TRANSMITTAL****

MICHAEL W. SIBITZ
Superintendent

BOARD OF TRUSTEES

MARGERY NEDER
President

CYNTHIA LINDSEY
Clerk

MARSHA B. WAGGONER
Member

STEPHEN L. STROUD
Member

GARY R. VANCE
Member

April 25, 1997

DATE

TO: (See Below) FAX #: _____

ATTN: _____

FROM: Margery Neder, Board Member FAX # (209) 524-2672

SUBJECT: CC Docket No. 96-45

NUMBER OF PAGES: 2 (includes this cover page)

COMMENTS: The attached is being sent via US mail also.

- To: 1--The Honorable Pete Wilson, Fax #916/445-4633
- 2--Reed Hundt, Chairman, FCC, Fax #202/418-2801
- 3--Rachelle Chong, Comm., FCC, Fax #202/418-2820
- 4--Susan Ness, Comm., FCC, Fax #202/418-2821
- 5--James Quello, Comm., FCC, Fax #202/418-2802

****PLEASE NOTE****

IF YOU DO NOT RECEIVE A COMPLETE FACSIMILE, PLEASE CALL OUR OFFICE IMMEDIATELY. THANK YOU.



CC96-48

STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

MEMORANDUM

Cecil H. Underwood
Governor

Joan E. Ohi
Secretary

TO: Rachelle B. Chong, Commissioner
Federal Communications Commission

FROM: Isiah C. Lineberry, Director
Office of Rural Health Policy

Isiah C. Lineberry

DATE: April 28, 1997

RE: 1996 Telecommunications Act

RECEIVED

MAY 1 1997

Federal Communications Commission
Office of Secretary

Please find attached a copy of the West Virginia Department of Health and Human Resources' Summary of Recommendations of West Virginia's official comments on the 1996 Telecommunications Act. The full comments were submitted to the West Virginia Public Service Commission on February 21, 1997, regarding rural health care providers, universal service and the 1996 Telecommunications Act.

The recommendations contained in the Summary of Recommendations reflect West Virginia's view of the issues that are most important for rural health care and telecommunications in our state. It is our hope that both the Federal Communications Commission and the West Virginia Public Service Commission will adopt the recommendations.

Thank you for your consideration of these recommendations. If additional clarification or comments are needed, please feel free to contact me at (304) 558-1327.

ICL\mh

Attachment

cc: Dave Forinash
Henry G. Taylor, M.D., M.P.H.
Mary J. Huntley, M.P.H.
Sarah Brack
Dan Christy
Chris Godfrey

BUREAU FOR PUBLIC HEALTH
Office of Community & Rural Health Services
OFFICE OF RURAL HEALTH POLICY
1411 Virginia Street, East
Charleston, West Virginia 25301-3013

Phone: (304) 558-1327

FAX: (304) 558-1437

**West Virginia Department of Health and Human Resources
Summary of Recommendations
to the
West Virginia Public Service Commission
RE: Rural Health Care Providers, Universal Service and the 1996
Telecommunications Act**

RECOMMENDATIONS

1. Appropriate Rates

Provide distance neutral reduced rates and reduced access charges to rural health care providers for basic and/ or advanced telecommunications services.

2. Local Dial-Up Access

Local access to the Internet must be made available to rural health care providers at local toll-free rates.

3. Infrastructure and Cost

Provide for the cost of extending telecommunications infrastructure to rural communities that would include construction of new or upgrading existing infrastructure.

4. Scope of Available Services

- a. The scope of services should include telehealth services: the transmission of preventive health data, reports of epidemiological investigations, guidelines for delivery of preventive services, training material and professional notices, professional teleconsultation with two-way interactive audio and video, access to health data and information via the Internet and multi-point consultation for emergencies.

- b. Providers must be able to choose from a growing range of telecommunications services up to the 1.544 mbps ceiling for any health-related applications the provider deems necessary ranging from dial-up to ATM.

5. Definition of Rural Health Care Provider

The definition of rural health care provider should be broadly inclusive to embrace: hospitals, primary care, local health, nursing homes, personal care homes, behavioral health, home health, hospice, emergency medical services, medical schools and the Department of Health and Human Resources.

6. Designation of Rural Areas

Modification should be made to the Office of Management and Budget's designation of metropolitan and non-metropolitan counties to identify small towns and rural parts of metropolitan counties that do not have easy access to central areas.



**APPALACHIAN
REGIONAL
COMMISSION**

*A Proud Past,
A New Vision*

Office of the Federal Co-Chairman

CC 96-45

April 28, 1997

RECEIVED

MAY 1 1997

Federal Communications Commission
Office of the Secretary

The Honorable Rachele Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Dear Commissioner Chong:

The Federal Communications Commission's findings on Universal Service that will be released on May 8, 1997 will have a very significant impact on the 399 counties that are served by the Appalachian Regional Commission [ARC]. The ARC serves parts of 12 states from New York to Mississippi, and all of West Virginia.

The ARC fully supports the FCC in its leadership role in encouraging an environment of competition between different service providers. The ARC believes that the FCC should provide a support subsidy system for toll-free access to the Internet for educational and telehealth users, and advocates a subsidy program that will provide rural areas with the opportunity to develop the state-of-the-art telecommunications services that are needed to ensure an educated, healthy, and ready to work population.

For more than 25 years the Appalachian Regional Commission has had an active interest in the role that telecommunications technology can play in helping move the Appalachian region into the nation's economic mainstream. Starting in 1972, the ARC partnered with NASA, the University of Kentucky, and the country of India to launch a satellite that would deliver educational programs to schools and communities across Appalachia. The ARC helped to finance all types of downlink facilities, including satellite dishes and microwave equipment, in order to distribute the educational programming throughout the region. The satellite was eventually re-positioned over India, where it provided similar educational services.

Since 1989 the ARC has funded more than 40 advanced full motion and compressed video and computer-based telecommunication networks that serve the educational, medical, government, and business sectors throughout the region. Many of these networks have been expanded several times over the past 8 years. Nearly all of these networks are utilizing fiber optic or T1 lines that cross LATAs. In most instances these networks have been set up utilizing "special rates" offered by the respective telephone companies that serve the region. These special rates in many cases are about to expire or have already expired. In one instance, the telephone rate increased nearly 4 1/2 times the original "introductory" rate.

Commissioner Rachelle Chong
April 28, 1997
Page 2

If similar significant rate increases occur, many users will simply turn off the equipment or disconnect from the network. When sites are disconnected, the entire community and its service area lose a valuable access to the Information Highway.

The ARC has supported the funding of these advanced telecommunication services because it feels that access to information is a critical element in a comprehensive economic development strategy for any community or organization. The ARC, as a Federal agency, has recognized and addressed the overall importance of the need for telecommunications services throughout the agency's Strategic Plan, which the Appalachian Governors and I unanimously adopted in 1996. The Commission believes that, unless the region is served by an affordable telecommunication system, Appalachia will be by-passed by the "Information Highway" just as the Interstate Highway System by-passed the region in the 1950's and 1960's. We believe that advanced telecommunication services are absolutely essential in building a sustainable economic base in a community.

As you know, the Appalachian region is comprised of many low and moderate income communities that are geographically isolated from major urban areas where there are numerous telecommunication services offered at affordable rates. The Appalachian region needs to have the same choices of bandwidths up to and including 1.54 Mbps necessary for the provision of telemedicine / telehealth care services, educational, governmental, and business sector uses that the more urban areas are already enjoying at this time.

If the rural Universal Service Rates are not comparable to urban service rates, the impact will be substantial and detrimental and will impair the Commission's--and the nation's--effort to give Appalachia a full seat at the table of American prosperity:

- rural areas will become less desirable places for businesses to operate from or locate in;
- many rural hospitals will cease to exist as the primary care site for communities, potentially resulting in a general decline in the overall health of a region and adversely affecting business recruiting activities;
- many doctors and other health care providers will not locate in rural areas unless they feel they can be supported by advanced telemedicine / telehealth services from the major urban areas;
- educational opportunities for traditional K-12 students will not be competitive with those in urban areas, impeding the effort to achieve the National Education Goals

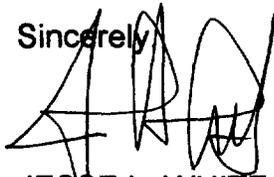
Commissioner Rachelle Chong
April 28, 1997
Page 3

- adult learners attempting to enter or re-enter the workforce (including welfare-to-work participants), as well as those needing skills upgrades, will not have access to current workforce training opportunities;
- local governments will lack the ability to more easily make their services conveniently available to their customers.

In short, if an affordable rural Universal Service rate structure is not put into place, the rural areas of Appalachia will become undesirable areas in which to live, operate a business, have access to adequate educational training, or secure adequate health care. The nation must have a carefully crafted subsidy program that takes into account the need to reduce distance-based telephone charges in education and telehealth-related services in rural areas.

I encourage you and your fellow Commissioners to keep these needs of Appalachia in mind as you craft your final rules on Universal Service. Please let me know if you or your staff desire any additional information about our telecommunications work in the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse L. White, Jr.", written over the word "Sincerely".

JESSE L. WHITE, JR.
Federal Co-Chairman

**Immaculate Conception School
1016 Laney - Walker Blvd.
Augusta, GA 30901**

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, NW
Room 844
Washington, DC 20554

RECEIVED

MAY 1 1997

APR 20 3 03 PM '97

OFFICE OF
COMMUNICATIONS
AND TELEVISION

RECEIVED

RE: Docket No. 96-45

Dear Commissioner Ness:

I am the Computer Teacher from the Immaculate Conception School, Diocese of Savannah, and would like to thank you for your dedication in ensuring that all school districts and education consortia will have affordable access to the Information Superhighway.

The Telecommunications Act and the Federal-State Joint Board decision will guarantee that all school districts will have the opportunity to connect to the Internet and provide distance-learning opportunities. The \$2.25 billion a year will address the needs of all our schools, and importantly, the plan will bring services directly into the classroom where students learn. Your inclusion of internal classroom connections for discounts is vital to this process. This plan is also essential in preparing our students for Workforce 2000.

It is the belief of the general population that students attending Catholic schools receive the best of everything. It is true that the quality of a Catholic education is remarkable, yet many of our schools, including this one, are unable to afford to keep up with the recent trends in technology. The discounts would enable us to completely fulfill our educational goals by providing impoverished students with the same opportunities as more affluent public and private schools through exposure to the Internet and other long-distance learning.

Our immediate technological goal at Immaculate Conception is to provide the

Computer Lab, the library, and each classroom with at least one Internet accessible computer. Our research shows that local Internet Providers are willing to install the necessary programs at no charge, and provide monthly service at a nominal fee, but we do not have a single computer with a modem or enough memory to provide us with Internet access. We also are unable to install telephone lines to the classrooms due to a lack of funding. Our ultimate goal is to network our Computer Lab to the individual classrooms, giving teachers and students complete access to educational software available in the lab.

Evidently, our students need deep discounts for telecommunications services this year. The parents, faculty, administration, and friends of Immaculate Conception urge the FCC to fully support the Joint Board's discount plan for universal services to schools. Enclosed is a copy of the petition signed by the members of the Immaculate Conception community, demonstrating our support for the passage of the Telecommunications Act of 1996.

Thank you.

Sincerely,

Vanessa W. Walters

On May 8, 1997, the four FCC Commissioners will vote on giving "E-rates", i.e. educational rates in the implementation of the 1996 Telecommunication Act for schools and libraries. We urge you to support the implementation of the E-rates, and defend the rights of students attending private or parochial schools to have access to the funds and discounts which this act makes available, by signing this petition.

Thank you.

#	Name	Address
1	Cheryl Jackson	245 Ellis St. Augusta, Ga. 30901
2	Annie Mae Walker	936 Perry Ave Augusta Ga 30901
3	Roscoe Brown	385 Azalea St, Augusta, Ga 30901
4	Pussilla Walker	125 E Walker St. August, GA 30901
5	Katherine Brown	1836 Kissinghower Rd. Augusta GA 30904
6	DOROTHY HEATH	612 E CEDAR ST, AUGUSTA, GA 30901
7	Alma Walker	125 E Walker St Augusta, GA 30901
8	Karla Walker	
9	Elaine Hoag	126 E. Walker St. Augusta, GA
10	NORA W. H. AMS	126 E. Walker St. Augusta, GA.
11	Ulanita Devote	127 Augusta, GA 30901
12	Gloria Clark	608 Marion Ave Augusta, GA 30901
13	Elizabeth Lawrence	610 Albany Ave, Augusta, GA 30901
14	David Heath	601 Wallace St Augusta, GA 30901
15	Beverly Brown	25 Walker St Augusta Ga 30901
16	Johnny Eagle	602 E Cedar St Augusta, Ga 30901
17	Hope Greene	2519 Blackstone St. Augusta GA 30901
18	Charles Wildman	106 East (Walker) St. Augusta Ga 30901
19	Ann Butler	3443 North Park Dr. & Hospital Dr.
20	Anna Scoble	3715 Franklin St.
21	Nikki Burke	2473 Dublin Dr. Augusta, GA 30906
22	Manuel Bus	22 Lombardy Ln Mount GA 30907
23	Carol Washington	1211 Dugas St. Augusta Ga 30901
24	Ann Cooper	2473 Dublin Dr. Augusta, Ga. 30901
25	Ann Jenkins	P.O. Box 1142011 Augusta, GA 30919

On May 8, 1997, the four FCC Commissioners will vote on giving "E-rates", i.e. educational rates in the implementation of the 1996 Telecommunication Act for schools and libraries. We urge you to support the implementation of the E-rates, and defend the rights of students attending private or parochial schools to have access to the funds and discounts which this act makes available, by signing this petition.

Thank you.

#	Name	Address
1	David Kelly	3604 Deerwood Dr Augusta GA
2	Keena Hopkins	3552 Kindling Dr Augusta GA
3	Erica Telder	2502 Creek Rd Augusta GA 31401
4	Antwan Thomas	3552 Kindling Dr Augusta GA 31401
5	Danika Doeth	8911 Tedesco Blvd Hephzibah GA 31428
6	Monzer Milton	8004 Belwood Dr 4019
7	Margaret Williams	3634 America Dr Hill GA 30906
8	DALE WILTSHIRE	P.O. BOX 1482 535 E. BOUNDARY ST. HARTWELL, GA. 30814
9	Karna Garrett	404 Cooper Mill Rd N Augusta SC 29841
10	Melanie White	4133 Burning Tree Lane Hill GA 30906
11	Kevia Lathan	4183 Bridlewood Trail Evans GA 30809

On May 8, 1997, the four FCC Commissioners will vote on giving "E-rates", i.e. educational rates in the implementation of the 1996 Telecommunication Act for schools and libraries. We urge you to support the implementation of the E-rates, and defend the rights of students attending private or parochial schools to have access to the funds and discounts which this act makes available, by signing this petition.

Thank you.

#	Name	Address
1	B. Evans	1440 Jackson Rd - Augusta, Ga. 30909
2	C. McFarland	1440 Jackson Rd - Augusta, Ga. 30909
3	D. Barnes	1440 Jackson Rd - Augusta, Ga. 30909
4	Wanda Carr	3024 Shady Lane, Heph. Ga. 30815
5	Bonnie J. Frasier	2717 Wells Foreman Rd. Heph. Ga. 30815
6	Julia Pitts	2358 Philo St. Augusta, Ga. 30906
7	Marilyn Lynn	3513 Woodman Dr. Heph GA 30815
8	Merrill Edwards	2708 Bertrand Road Augusta 30907
9	Hertude B. Ware	4527 Avery Ave. Augusta, GA 30907
10	Ashley H Wright	300 Nicole Rd. Waynesboro, Ga 30380
11	Connie J. Royal	167 A. Pinecrest Drive North Augusta, SC 29841
12	Kathy Maddox	4243 Black Oak Court
13	Sadie Bing	809 Belafonte Drive, Augusta 30901
14	E. D. Sess	2383 Combat St Augusta Ga 30907
15	Lisa Willis	3188 Skinner Mill Rd Augusta, GA 30909
16	Lilli Hamilton	2712 Oakland Ave. Aug. Ga. 30909
17	Latoya McCloud	3281 Hillwood Lane
18	Traci Anne Richardson	2503 Pezot Ct Heph. Ga. 30815
19	R. Calvin Brown	5002 Gick Ln Heph. Ga. 30815
20	Edward J. Feltz	1833 South Barton Dr Augusta GA 30906
21	Immi Keller	1831 South Barton Dr. Aug. Ga. 30906
22	Nick & Fallett	1829 N Barton Dr Augusta Ga 30906
23	John C. Brewer	1901 Pine Hollow Dr Augusta, GA 30906
24	John Brewer	1901 Pine Hollow Dr., Augusta, GA 30906
25	Wanda K. Moore	3520 Crawfordville Dr Augusta Ga 30909

On May 8, 1997, the four FCC Commissioners will vote on giving "E-rates", i.e. educational rates in the implementation of the 1996 Telecommunication Act for schools and libraries. We urge you to support the implementation of the E-rates, and defend the rights of students attending private or parochial schools to have access to the funds and discounts which this act makes available, by signing this petition.

Thank you.

#	Name	Address
1	Phyllis Thomas	3855 Fairington Dr; Hephzibah, GA 30815
2	John Thomas	3855 Fairington Dr; Hephzibah, GA 30815
3	Rosa Lewis	107 E. Hall St.; Augusta, GA 30901
4	Fred Lewis	107 E. Hall St.; Augusta, GA 30901
5	Elease Brinson	109 E. Hall St; Augusta, GA 30901
6	Audrey Bell	109 E. Hall St; Augusta, GA 30901
7	Rosella Lee	2091 Hillsinger Rd; Augusta, GA 30904
8	Rosa Thomas	3430 S. Kensington Dr.; Augusta, GA 30906
9	Earl Thomas	3410 Webster Rd; Augusta, GA 30906
10	Girdie Thomas	3410 Webster Rd; Augusta, GA 30906
11	Ronald Thomas	3430 S. Kensington Dr.; Augusta, GA 30906
12	Janie Moody	1320 Cherry Ave. Augusta, GA 30901
13	Ruth Gregory	110 E. Taylor St.; Augusta, GA 30901
14	Ernestine Thomas	110 E. Taylor St; Augusta, GA 30901
15	Willie Mae Gunter	1320 Cherry Ave.; Augusta, GA 30901
16	Rev. Oscar Wells	931 Cedar St.; Augusta, GA 30901
17	Betty Green	Green's Hair Salon, Sand Bar Ferry Rd; Aug. 30901
18	Carrie Stallings	536 Aiken St; Augusta, GA 30901
19	Robert Safford	2616 Whittier Place Hephzibah, Ga 30815
20	Samuel Martin	3524 Crawfordville Rd Augusta, GA 30909
21	Robert Shoy	818 W. Lake Circle, MARY GA 30902
22	Bonnie Schlachter Bonnie Schlachter	P.O. Box 3, EVANS GA 30809
23	Drew C Cook	3863 Wrightstone Rd
24	Sarah Collins	419 Colorado St. Augusta, Ga 30901
25	Minnie Dean	171 First W. Hill St. Augusta, GA 30901

On May 8, 1997, the four FCC Commissioners will vote on giving "E-rates", i.e. educational rates in the implementation of the 1996 Telecommunication Act for schools and libraries. We urge you to support the implementation of the E-rates, and defend the rights of students attending private or parochial schools to have access to the funds and discounts which this act makes available, by signing this petition.

Thank you.

#	Name	Address
1	Leroy Taylor	3612 Monmouth Rd Hephzibah GA. 30815
2	Armaan Prince	2137 Hillside RA Augusta GA 30804
3	Byron G. G.	1814 Liberty Ch. Rd. Heph. Ga. 30815
4	Ernest O. Stucky	3825 Woodlake Dr. Heph. GA. 30815
5	Mark Thomas	2024 Cook Rd Augusta GA 30904
6	Immie Colman	533 Hwy 25, S. Waynesboro Va 30830
7	Leota Mock	P.O. Box 211347 MARTINEZ GA 30917
8	Mickey Murray	537 Bradley Dr. North Augusta SC. 29841
9	R. & M. Smith	4025 Old Waynesboro Rd. Augusta Ga. 30906
10	Norman Miller	190 1/2 Meadow LAKE APT #1 Augusta GA 30906
11	Robert A. (Bob) D.	2922 Celeste Dr. Hephzibah Ga 30815
12	Howard R. Fash	531 Old Eagle Rd. N. Augusta SC. 29847
13	Hartie Aust	3340 Tobin St. AUGUSTA, GA. 30906
14	Richard B. Wicks	3909 Kitchen Dr. Heph. Ga. 30815
15	Leroy Jenkins	2366 Travis Rd Aug GA 30906
16	Bobby King	9875 Lake Michigan Dr. hephzibah Ga. 30815
17	David J. Anderson	1825 Calaver Dr
18	Linda O. Venton	248 Napu DR 30909
19	Tommy King	2339 Tobacco Rd Augusta GA 30406
20	Barry Crawford	2801 April Dr. Augusta Ga. 30906
21	Doris M. Mahley	316 Larry Drive Waynesboro, Va.
22	Glenn H. Hill	118 Leona Blvd Martinez, Ga 30907
23	Edward Smalley	3215 Massett Dr Augusta Ga 30906
24	Glenn Holton	P.O. Box 121 Waynesboro Va. 30830
25	Verum Brent	P.O. Box 14134 Augusta, GA. 30309

On May 8, 1997, the four FCC Commissioners will vote on giving "E-rates", i.e. educational rates in the implementation of the 1996 Telecommunication Act for schools and libraries. We urge you to support the implementation of the E-rates, and defend the rights of students attending private or parochial schools to have access to the funds and discounts which this act makes available, by signing this petition.

Thank you.

#	Name	Address
1	Demetrius Robinson	2461 Danvers Rd Apt. 6B 30909
2	David Newman	1739 Starnes St Augusta, GA 30908
3	Shirley Peterson	645 Crestlyn Dr. N. Augusta, SC 29841
4	David Green	1724 ... ST ... 30904
5	Damon C. Brooks	1054-E Woodsedge Dr. Augusta, Ga 30904
6	Franklin L. Stoh	3530 A Bullock Ave. Augusta, GA 30906
7	Michelle Brinchart	138 Lutheran Dr. Aug, Ga 30907
8	FRANK BROWN	1235 15 TH St. Augusta St. 30909
9	Kochney Corley	2823 Vernon Dr. Augusta, Ga. 30906
10	Craig D. Wilbard	1407 Bertram Ct., Augusta, GA 30909
11	Donald Darniel	10 1/2 E Woodsedge Dr. Augusta GA 30904
12	Adrian Tillman	1917 Seaborn Dr. N. Augusta, SC 29841
13	Willie Beamer	926 Courtside Augusta 30909
14	Ron Spay	1235 15 TH St Augusta GA 30910
15	Arden ...	2020 Baker Ct Augusta Ga
16	Bill Elliott	2023 Barton Ct. Augusta, Ga.
17	Chuck Allen	2013 BARTON CT Augusta, GA 30906
18	Maria G. Alicea	2013 Barton Ct Augusta, Ga 30906
19	Don Riles	2011 Barton Ct Augusta, GA 30906
20	Cary Reese	2003 BARTON CT Augusta GA 30906
21	Yervick S. Peep	2003 Barton Ct Augusta GA 30906
22	Bernard Howard	2007 Barton Ct 30906
23	Max ...	1848 S BARTON DR. - AUGUSTA, GA 30906
24	Sharon Daniels	1840 South Barton Dr Augusta GA 30906
25	Condo ...	1835 South Barton Dr. Aug. H. 30906