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Ashley C. Schannauer

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October 20, 1998

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Re: In the Matter of Inquiry Concerning the Deployment of Advanced
Telecommunications Capability to All Americans in a Reasonable and Timely
Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section
706 of the Telecommunications Act of 1996
CC Docket 98-146

Dear Ms. Salas:

Enclosed in the above proceeding are the original and nine copies of the Petition
of Information Renaissance for Electronic Posting of Comments and for Extension of
Time to File Reply Comments. The Petition was filed today through the Commission's
Electronic Comment Filing System.

Please distribute five of the copies to the commissioners.

Very truly yours,



Ashley C. Schannauer
Attorney

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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
Inquiry Concerning the Deployment)
of Advanced Telecommunications)
Capability to All Americans in a)
Reasonable and Timely Fashion,)
and Possible Steps to Accelerate)
Such Deployment Pursuant to)
Section 706 of the)
Telecommunications Act of 1996)

CC Docket 98-146

**Petition of Information Renaissance
for Electronic Posting of Comments
and for Extension of Time to File Reply Comments**

Information Renaissance respectfully submits the following Petition, asking the Federal Communications Commission (FCC) to post in electronic form the comments it has received in this proceeding and to grant an extension of time to file reply comments.

1. Information Renaissance is a non-profit group in Pittsburgh, Pennsylvania, that promotes community networking and the use of the Internet to increase public participation in government. The Internet offers the prospect both for greater access to government information and a greater ability to submit comments to agencies.

2. Information Renaissance filed comments in this proceeding on September 14, 1998, but we have been unable to file substantive reply comments, as due on October 8, 1998. While well-intentioned and presenting a potential model for enhancing public participation in agency rulemakings, the

FCC's Electronic Comment Filing System (ECFS) has not posted the vast majority of the comments that have been filed in this proceeding – despite the FCC's announcement earlier this year that the system was ready and available. As a result, Information Renaissance has been unable to submit anything more than a single reply comment, requesting that the public comment period for the NOI be extended until after the comments are electronically posted.

3. Public comment is especially necessary in this proceeding. The ultimate focus of the section 706 proceeding may be on measures to deploy advanced telecommunications capability, but the initial questions involve determining the public's needs and whether deployment is occurring in a reasonable and timely fashion to all Americans. In the course of that initial review, the FCC will be considering implicitly or explicitly four initial questions: what does deployment “to all Americans” mean? What levels of bandwidth should be expected for various segments of the public? What rates of deployment are reasonable? What level of accessibility is adequate? These issues should be of crucial interest to all Americans, and their viewpoints should be considered in the FCC's review.

4. For most of the public – those who are not represented by special interest groups located in Washington, DC – the only practical opportunity for access to this proceeding is through the Commission's ECFS. Normal users of advanced telecommunications services and the public generally do not have easy access to the files of the FCC in Washington, DC. It is impossible for the general public to obtain the initial comments filed in a proceeding and file reply

comments in the 24-day time frame allowed in this NOI – unless the public has electronic access to the filings. Without ECFS, the rulemaking process is also expensive. More than 90 initial comments and more than 50 reply comments have been filed. Even if a non-DC based organization were able to physically acquire the comments on a timely basis, the costs of copying, search time and shipping through the FCC's copying contractor will strain the budgets of most public interest groups.

5. The FCC announced the availability of the ECFS in July of this year and suggested that the system would be available for use in subsequent proceedings. Comments submitted through the ECFS were to be posted automatically to the FCC's web site. See Report and Order, In the Matter of Electronic Filing of Documents in Rulemaking Proceedings, GC Docket No. 97-113 (April 6, 1998), at 1-3, 9.

6. In this proceeding, however, the ECFS has provided access to only four of the more than 90 comments that have been filed. As a result, those members of the public, including Information Renaissance, who were relying upon the ECFS to review the initial comments and to prepare replies have not been able to do so.

7. Without the public participation sought by Information Renaissance, we fear that the proceeding may focus on the particular interests of the usual parties to the telecommunications regulatory process – the incumbent local exchange carriers, the long-distance carriers, the competitive local exchange carriers

(CLECs), the equipment vendors and the state utility commissions – and ignore the broader purposes of Section 706.

8. Furthermore, although a number of reply comments have been added to the site for the proceeding (about 15 of 50 reply comments), it is unclear whether the staff will, in fact, post the remainder of the initial comments and the rest of the reply comments. Information Renaissance submits that all of the comments should be posted, regardless of the Commission's action on our request for additional time to file Reply Comments.

9. Information Renaissance, accordingly, requests that the Commission post in electronic form all comments that it has received and extend the period for reply comments.

Respectfully submitted,



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Dated: October 20, 1998