

February 15, 2000

The Commissioners  
Federal Communications Commission  
via electronic filing

Re: CC Docket NO. 98-184 // The Bell Atlantic - GTE Transfer of Control

Dear Commissioners:

On November 20, 1998 I urged the NYS Public Service Commission to approve the merger of Bell Atlantic and GTE. (See Documentation Item #1 below.) My comments described how the geographically-ignorant, distance-insensitive Internet was having a negative impact on place-based communities, and how the net's fundamental design threatened our society's traditional economic, social, and governance arrangements. But I supported the merger believing it was Bell Atlantic's intention to work with our community to remedy these concerns - in concert with the new expertise GTE's Internetworking group would bring to the New Entity.

However, after my positive submittal to the NYS PSC, the cooperation I'd perceived vanished, and I've found Bell Atlantic totally unresponsive to our community's needs. Indeed, on November 17, 1999 our Community Board passed a resolution requesting that Bell Atlantic add a 'Community Button' to the boot page of their Internet service. This 'Community Button' would link local residents to our community web page and help meliorate some of the Internet's negative impact on community life. But Bell Atlantic's only response to our resolution has been to say that their Internet service is national in scope, and therefore it can not be customized for our community . (Our Community Button Resolution is included below as Documentation Item # 2.)

Commissioners, I urge you to reject the proposed merger of Bell Atlantic & GTE under the conditions proposed on January 27, 2000. I make note that my 1998 "disadvantages of size" comments to the NYS PSC are proving true; with today's size problems are apparently arising from the recent NYNEX - Bell Atlantic merger. Bell Atlantic's loss of focus was apparent when we suggested the 'Community Button' as one simple way they could have chosen to work with our community, they snubbed their noses - "You're too little, you don't count, we don't care".

However, if you find the merger to be in the broad public interest, I urge its approval upon two conditions: First, you receive a signed agreement to implement a "Community Button" in each of the communities directly served by the New Entity. Second, they commit to invest in some fundamental protocol modification (either through the merged New Entity or the Internetworking entity) to meliorate the impact of the Internet, and thereby strengthen place-based communities - towns, cities, counties, states, and nations.

Thank you for your attention to this matter.

Sincerely,

Thomas Lowenhaupt  
Vice Chair, Community Board 3Q  
Jackson Heights, NYC  
TOML@communisphere.com

Documentation Item # 1: Merger comments to NYS Public Service Commission  
Documentation Item # 2: Community Button Resolution

Documentation Item # 2

The following resolution was unanimously passed by Community Board 3Q,  
of the City of New York, on November 18, 1999.

Resolution Supporting Community Button

Definitions:

- o Local Internet Service Provider - An organization providing access to the world wide web, via computers or televisions, to residents of Community District 3.
- o Boot Page - The initial screen that comes onto ones monitor upon connecting to an Internet Service Provider.
- o Community Button - A space on the Internet Service Providers boot page that directs the user to our community board's web site.

The Community Board has a statutory responsibility to facilitate communication between city agencies and our residents, and we have a fundamental need as a planning organization to maintain and improve communication in our community.

Board 3 is in the process of selecting and developing various digital technologies to facilitate the community communication process. A key element of our plan is a web site offering access to the Board's activities and those of our community.

A concern in planning the Community Board 3 web site has been the ability of our residents to find it from amongst a billion others on the net.

We believe that a "Community Button" on the boot page of Internet Service Providers is the most effective way (maybe the only practical way) to let our residents know of the existence of the Community Board's web site.

This "Community Button" is a small space on the Internet Service Providers start up screen (called a boot page) that directs the user to our community board's web site. An Internet user need merely click on the "Community Button" to be brought to Board3's web site with it's multiple links to the community.

We request that Time Warner, Bell Atlantic, RCN, America Online, and other responsible providers of Internet services to our community place our "Community Button" on their boot page.

End

Copies of this resolution are to be sent to: Time Warner, Bell Atlantic, RCN, Cablevision, America Online, the Mayor, Borough Presidents, DoITT, all City Council Members and Community Boards.

Documentation Item # 2

November 20, 1998

The Commissioners  
New York State Public Service Commission  
c/o Debra Renner, Acting Secretary  
3 Empire State Plaza  
Albany, New York 12223-1350

Re: 98-C-1442 - Bell Atlantic Merger with GTE

Dear Commissioners:

These comments review two concerns I have about how Bell Atlantic's merger with GTE will affect life in my community:

- o Concern of becoming a needle in an even bigger haystack;
- o Fear of a great metamorphosis from concerned local phone company into a global corporation that abandons its residential roots.

But there are benefits that may come with the New Entity, as detailed in the following.

-- Needle In Haystack --

How will the corporate citizenship responsibilities of the 'New Entity' (the merged Bell Atlantic-GTE) differ from those of the old New York Telephone? When New York Telephone provided our phone services its community involvement and concern was palpable. New York Telephone had a half-dozen employees whose responsibility it was to assure the continued viability of community life for Queens' 2,000,000 residents. They were in constant contact with the business, cultural, civic, religious, and social organizations, and their needs.

As it grew into NYNEX and now Bell Atlantic the corporate focus has necessarily shifted to other states and even overseas. The consequent management controls allow less flexibility at the local level. Today's community staff has dwindled to one person. And the breadth of concerns has shrunk to one - education.

Our community has been working with Bell Atlantic to meet a community communication need and we're concerned that the New Entity might further limit local discretion and focus. This is discussed in more detail later.

-- Metamorphosis --

My grandparents owned stock in the Pennsylvania Railroad. As a child and young adult I followed its metamorphosis from a railroad, bound to the soil and its tracks, into totally different industries.

I fear the New Entity, while serving the Corporate 500's global needs, will conclude that the residential customer has become a burden and feel compelled, by quarterly earnings demands, to shed the poorly performing residential customer. Statements like the following from Bell Atlantic's Senior Vice President Tom Tauke fuel the fear:

"the residential sector is not profitable for new entrants. Residential service is priced below cost and subsidized by access charges and revenue

from business lines".

Communications Today, October 9, 1998.

Where will the pressure for community involvement come from when the New Entity goes global and is looking to shed its poor residential performer? What financial instrument might be devised to allow the separation of the residential customers from the New Entity?

-- The New Entity, the Internet, & Community Life --

In recent years a good deal of my time has spent on community matters. I'm a member and vice chair of Community Board 3. In New York City the Community Board is the grassroots level of government. We have broad planning responsibilities, we recommend and monitor service delivery standards, and make zoning recommendations. My district covers three neighborhoods surrounding LaGuardia Airport - Corona, East Elmhurst, and Jackson Heights. 125,000 people live here.

Since my appointment to the Board in 1992 I've labored to improve community communication, seeing it as the central element that allows us to exist as a community. Indeed, without communication there can be no community.

With a background in communication systems design I've sought to weave interactive technologies into a community communications system. Heaven knows we desperately need it.

As our civilization has become increasingly complex the communication systems available to our community have become dysfunctional. We're inundated with trash and trivia through TV, radio, and newspapers. And industrial economies of scale have resulted in our having no local TV, radio, or daily newspaper. Here we sit in the middle of the "world communications capital" and yet we must rely on word of mouth or snail mail for civic communication. And now I discover that the Internet, hyped as 'the communications system to end all communication needs', is instead dividing our community.

Understandably the Commissioners might shake their heads and ask "How can this be?"

Think back to the Internet's origin. Was it conceived as the basic communications structure for the planet's civil society? Did society's elders say:

--- OK geeks, here's the game plan. We want you to build a communications system that will promote family values. Make it something that will help communities become a better place to live. Closely examine social and economic needs and involve a broad swath of society in designing it. And make sure it's a system that will protect privacy while providing opportunities for local economic development. And make it capable of providing entertainment and other communication services.~ And here's a blank check. ---

As you know, that's not the Internet's history. The system was designed for military purposes and outside the purview of civil society. In the mid-1990s moguls led the public to invest heavily in the geek system, and now they're trying to turn the net into net profit.

-- Net Damage --

When I was first appointed to the Community Board I thought that, being an 'expert' in interactive technologies, I'd pull a BBS off my shelf and put it to work solving community problems. At first there was some small interest - residents and Board members were beginning to communicate with one another. Then the Internet arrived and things got worse. "Worse?" some of you are probably saying in disbelief. "Isn't the Internet the best thing that ever happened to the online world?" From a global perspective it offers some dandy features. But, from the vantage point of community communication, it's damaging. I'll explain.

Just after our community began experimenting with the BBS the web arrived and walloped us - it offered a vast world that made our community effort seem puny. Nobody wanted to hear about a seemingly obsolescent BBS. "Where's the world?" they'd ask.

-- The Internet's Military Design --

The online world offers a significant opportunity to improve community communication. But to reap these benefits we need two fundamental features: common access to an online service and a community channel. However, since the Internet was designed for military not community use, these two features are not available.

-- Common Access --

Let me first discuss the issue of Common Access. It's need is most apparent in our schools - the more wired part of our community. If you attend a school governance or technology meeting these days administrators exaltedly say things like "THE PARENTS WILL HAVE ACCESS TO THIS AND THAT VIA THE INTERNET." But they're not investing federal E-Rate or local school monies in this. No, individual parents are expected to spend \$200-300 a year on AOL or the like (plus get a computer, training~). This is not a realistic expectation for many families.

-- The Community Service Tier --

But our community is preparing a solution. Through The Communisphere Project, our local effort to bring Information Age benefits to our community, we're developing a two-tiered Internet - one free, one pay. The free Community Service Tier will provide access to email, a community calendar, civic, school, city, state, and federal web sites. The pay tier will provide access to everything else the Internet has to offer - and subsidize the Community Service Tier. Some have likened the Community Service Tier to a hybrid of the cable access channels and the telcos lifeline services.

Together with a computer reuse effort we expect this project to provide access to many.

But our plans are largely incompatible with the standard Internet architecture. To the military-mind, distance was inconsequential - there was no need to differentiate between a battle zone in Asia or South Africa. Consequently, standard Internet technology can't distinguish between a call to the local church or one to the Vatican or Lhasa. Consequently, while we

were negotiating with Bell Atlantic to partner with us on this project, we heard them calculating the engineering investment they must make to allow the Community Service Tier to function on the military-design Internet.

-- The Community Channel --

For a community to run effectively (or even to exist) it's essential that its residents have a means to communicate with one another. Since our community has no local mass communication channels many have hoped and expected the Internet to provide one. But the military designed the Internet to support virtual communities not geographic ones and as it moved to civil society no modifications were made to enable it to function as a community oriented system. So there are no features that allow us to connect as neighbors and discover common interests. There is no way to let the community know about THIS or THAT problem, an exciting new opportunity, or next Tuesday's big meeting.

The reasons for this are easy to discover for yourself. Ask your neighbors to name their Internet Service Providers. You'll hear a remarkable number of companies mentioned - a lot of AOL, some AT&T, Bell Atlantic, Netcom, TIAC, Rocket, ABC, XYZ~ When trying to establish community each of these ISPs is best thought of as speaking a different language. It's Babylon. Consequently, with the Internet designed as it is, we are losing community.

-- Community Unfriendly --

Let me combine these two community-unfriendly features into a picture of the Internet's likely impact on one segment of our community - shopkeepers. For context and historic perspective, think of the impact the automobile had on community shopkeepers, i.e., think about shopping malls and downtown deterioration. Now, think of a distance-insensitive Internet where it's as easy to connect with a store in Paris as around the corner. And think of an Internet without any reasonable means to identify or even find local shopkeepers. An Internet where each neighbor connects through a different interface. A dim future is seen for local shopkeepers.

Was the Internet intentionally designed by the military to destroy shopkeepers? Certainly not. The problem, quite simply, is that the Internet was designed for military purposes, not civilian. It was conceived without the shopkeeper, the school teacher, the parent, the child, the local government, libraries, businesses, or hospitals in mind.

-- Global Business --

One entry on this list of civilian impacted groups needs special note. While the Internet was not designed for business use, some corporations are able to use it to broadly expand their markets - to go global. And the companies that service these firms need to 'go global' to service them. This is the case with Bell Atlantic. They feel compelled to focus their attention on their largest customers and the global marketplace - if they don't, their most profitable customers will be taken away by the competition.

-- Synopsis --

So here we have our local phone company compelled by market forces to expand to a global clientele. Its residential customers are increasingly thought of as a distraction and burden. We have a community with an inadequate

communication. And the technology that runs the entire system is rapidly changing as the Internet - a community-unfriendly technology - takes over.

What's my community to do?

-- Bell Atlantic & GTE - The Community Team --

For now our fate is in your hands. It's the PSC's responsibility to look out for residential customers. I offer the following course as one that will meet both our community's needs and those of the New Entity's.

Common access to the Community Service Tier would allow our community to join, and enjoy the fruits of, the Information Age. As a viable community we'll have an educated and employed population able to purchase the products of the New Entity and it's Corporate 500 customers. (Without a viable community society and the economy will be hell.)

We've engaged Bell Atlantic in conversations about joining with us in developing common access and a sustainable Community Service Tier. But the limitations of the military designed Internet makes its implementation difficult.

However, one of the key parts of GTE, GTE Internetworking (as BBN) was the designer and implementer of ARPANET, the Internet's progenitor. GTE Internetworking has the expertise to make the Internet community-friendly.

I urge the New York State Public Service Commission to approve the merger under the following conditions:

- o That the New Entity demonstrates its commitment to continued care for its residential customers through its development of a community-FRIENDLY Internet that supports common access and the Community Service Tier (CST).
- o That upon its demonstrated success in our community, the New Entity commit to common access and a Community Service Tier throughout its service area.
- o That the PSC mandate that all Internet Service Providers have a Community Service Tier (or minimally its logo) as their default start screen.
- o That the PSC require all telecommunications carriers to contribute to a Community Service Tier Operating Fund to be used to design, organize, and maintain the CST.
- o And that it consider the inclusion of 911-like emergency features on the CST.

The New Entity will have the size to raise the needed capital and the expertise to correct the Internet's technical glitches. As well, it has the long community involvement to oversee the viability of the CST and common access.

This level of involvement by the New Entity will require the PSC to rethink some of the precepts of recent years. But if it views community as essential to the future of the New Entity this plan will be seen as both appropriate and necessary.

As our state and region are part of a greater swirl of activity the NYS PSC should urge the federal government to acknowledge that the current Internet is 'damaged goods'. That it's destined to run havoc in our community if uncorrected. And that they should establish a fund to make the necessary adjustments. The NTIA's Telecommunications Information Infrastructure Advancement Program (TIIAP) is a prime candidate for managing this fund.

From the start the New Entity needs to plan an Internet redesign that promotes community life. The redesign needs to start with:

--- OK geeks, here's the game plan. We want you to build a communications system that will promote family values. Make it something that will help communities become a better place to live. Closely examine social and economic needs and involve a broad swath of society in designing it~

With this approach our communities, our state, our nation, its telecommunication infrastructure and providers will all be strengthened.

Sincerely,

Thomas Lowenhaupt  
Member, Community Board 3

Background: Thomas Lowenhaupt has been involved with designing and developing interactive telecommunications systems for two decades: cable TV 1978-82; electronic kiosks 1981-84; electronic marketing 1985-Date; published QWIX Guide To Online Services 1988-91; founder and director The Communisphere Project 1993-date; consultant. He is a member and vice chair of Community Board 3 and co-chair of its communications committee. B.A. from Queens College and masters in Interactive Telecommunication from New York University's Tisch School.