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Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, DC 20554

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RE: GN DOCKET NO. 00-185

Dear Ms. Salas:

NetWorld Ohio, Inc. dba NetWorld Online was formed in May 1995 as the result of a hobby. Barry Watts, founder of NetWorld, toyed with a private Bulletin Board System (BBS) for a few years in Fremont, OH and as interest in this new medium developed he decided to gather support from a few local business people thus NetWorld Ohio was born.

Since NetWorld's humble beginnings our goal has been to provide reasonably priced Internet access to communities for the purpose of entertainment, education and doing business electronically. As new and exciting technologies have been developed, we have led the way in this market to offer our Customers the best services available.

NetWorld began with only two individuals. Today we employ 12 people locally and cause the employment of many more through our vendor relationships. We provide a full range of services from Dial Up Internet Access to Dedicated T-1's, xDSL, Satellite Internet, web hosting, web site design, Web Based Training and Internet Marketing. There isn't one aspect of our business that doesn't require some type of training and interaction with our Customers.

We have helped thousands of people in Northwest Ohio, particularly in the rural markets, learn what the Internet has to offer and make use of it. In the early days of NetWorld we provided free weekly classes in a number of communities so people could catch a glimpse of the valuable content and information the Internet held. We taught many people how to use email, web browsers, search engines and the like.

This commitment to the Community still exists today as we participate and provide service to many community based organizations and schools. It is our privilege to serve the Communities we do business in and a joy to be asked to give presentations on a number of technology related topics. It is my personal pleasure to serve on an advisory board at one of our local technical high schools.

We had an opportunity present itself recently that depicts our impact in Fremont, Ohio. The local Sandusky County Visitor's Bureau had a web site hosted by a competitor. It seems the Visitor's Bureau could not afford to update their web site and hadn't done so in quite some time. It came to the attention of the local newspaper and they published a front-page article decrying this fact. What a shame.... Well, we jumped in and offered our assistance. Yes, NetWorld hosts the site now. We updated it and continue to do so even though we have not been compensated for it. Why? Because it was and is important to the community.

We have been instrumental in assisting the business community in learning and using the Internet to communicate and do business. So many opportunities exist today and yet many are

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under utilized because of the learning curve involved. Our work is not done. Bigger providers underserved these rural areas until more recently. Now we face the most severe competition we have ever seen in these markets, but that's okay.

You see I have always operated this business with a commitment to Customer Service knowing that as long I took care of our Customers we would continue to grow and be profitable. Technology is tough to keep up with these days on a level playing field. It's even more difficult on a field where we aren't allowed to play at all.

You see, it's no secret that the telephone infrastructure in these rural markets was never designed to carry the data traffic the Internet demands. We pay a premium for the services we purchase and the quality of service is fair at best. XDSL is virtually non-existent in most of our markets and the Ameritech version that is just now being made available is very expensive both to consumers and Internet Providers.

In many areas we have Customers who can't get connected faster than 2800 kbps because of the poor local infrastructure. The saddest part is we all pay top dollar for these services that should allow our Customers to connect at 56k or close to it.

Now national and local cable companies are entering the Internet arena with exclusive access agreements and offering Internet services on a network that was built and developed in a monopoly environment. Local ISP's like NetWorld Online, who first brought the Internet to these markets, are being told that we can't purchase access on these high-speed networks to offer broadband solutions to our Customers.

Hardly a day goes by when we don't field a request from a Customer asking for faster access options. This is having a dramatic effect on businesses as they are being required by vendors to not only have Internet access, but some form of broadband or dedicated access in order to process and place orders and manage Customer service. In many cases these businesses call us because of the value we bring to the table.

As a result of the inquiries, we sought to bring broadband to areas where cable and xDSL services are not available. We spent a great deal of energy and effort searching for the right solution and have recently begun offering Satellite Internet Services. Again we saw a need and found a way to fill it. Not because we particularly wanted to be in the satellite business but because we felt an obligation to these underserved markets where many of our Customers live.

We've already seen what services like xDSL have done with price when there is competition in the marketplace. It's common to purchase xDSL service in metropolitan areas for less than \$40 per month. Cable companies are offering High Speed Internet with similar price points yet they won't open their networks to ISP's. Consumer choice is an important aspect in any business and it seems somehow cable companies, who made investments in markets under an exclusive arrangement, are now continuing their monopolistic practices even today.

Since telephone networks are open and the Internet as we know it today exists because of equal access, I believe cable networks should be open and cable operators should be required to provide fair and reasonable pricing to all ISP's that want access without discrimination.

Consumers deserve choice. It drives competition and keeps prices low.

Consumers should have access to any and all content they chose from their provider as well. Whatever services the Customer wants should be left to their own discretion, not dictated by the cable operator. We've seen a significant increase in video training and broadcast video

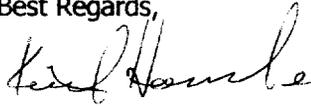
applications being made available to the consumer and business sectors. Consumers should be able to utilize these services via their Internet providers without limitation.

Internet Providers who do gain access to Cable networks should also be able to maintain their brand without any requirements to co-brand with cable network providers.

Each of these requests is no more or less than what already exists for ISP's on telephone networks. While the debate may rage on about the differences of these two industries, I believe the similarities are far too compelling to ignore any longer. The same types of services are available and the same Customers are affected. Soon we will see more voice, video and other applications not yet developed coming to the forefront. These services will require broadband access. If cable operators are allowed to maintain their stranglehold on this delivery medium we will all be hurt by it. ISP's like NetWorld will lose too much market share to continue to exist, or at the very least, our ability to provide value added services to the community would be severely limited.

Please consider carefully these requests and ensure that all cable operators are obliged to comply with these open access standards. Our industry and the future of the next generation of the Internet are dependent on your decisions today.

Best Regards,

A handwritten signature in black ink, appearing to read "Keith Houske". The signature is fluid and cursive, with a large initial "K" and "H".

Keith Houske  
President  
NetWorld Online