

Magalie Roman Sala, Office of the Secretary
FCC
445 12th St., SW
Washington, DC 20554

RE: [CC Docket No. 96-45, FCC 01-31] Federal-State
Joint Board on Universal Service

Dear Ms. Salas:

The following comments from the Whitefish Bay Public Library relate to the FCC's Notice of Proposed Rule Making regarding the Children's Internet Protection Act (CHIP Act).

My main areas of concern are listed below.

1)Date of act's implementation: Year 4 E-rate activities were well underway long before the CHIP Act was passed by Congress. Therefore, year 5 of the E-rate program (July 1, 2002-June 30, 2002) is really the "first program funding year" of the act and not year 4.

2)The "disabling during adult use" provision: The public library's Internet Safety Policy can be written in a manner to allow adults unfiltered access without constant, proactive staff involvement. To require adult patrons to always ask staff to disable the filters places an unnecessary restriction on information that adults have a legal right to access and it is cumbersome and time consuming for already busy staff to administrate. Library staff need flexibility in this area.

3)Certification language: There is no "technology protection measure" that can always block all visual depictions outlawed in this act. Thus, the FCC's certification language should include a statement that acknowledges the imperfect nature of such measures.

4)The E-rate form to certify compliance: Because form 471 does not trigger the flow of any E-rate discounts, it is not appropriate to require compliance on form 471. Compliance for the first year of the act and any subsequent years should be on form 486.

Sincerely,

Tracy Blaschka, Director
Whitefish Bay Public Library
5420 N. Marlborough Dr.
Whitefish Bay, WI 53217