

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
2007 Eligible Services List for Universal) CC Docket No. 02-6
Service Mechanism for Schools and Libraries)
)

**Comments from the
Wisconsin Department of Administration and
Wisconsin Department of Public Instruction
(Filed August 4, 2006)**

RE: Suggestions for the 2007 Eligible Services List related to Video Scheduling

The Wisconsin Department of Administration and Department of Public Instruction appreciate this opportunity to comment on possible changes to the 2007 Eligible Services List. Our departments respectfully request that the SLD review and revise some language in the Eligible Services List (ESL) related to Video Eligibility. We have outlined our suggestions below.

Video Eligibility

Language related to the eligibility of "distance learning, interactive television and video" facilities or services appears in many areas in the ESL. The glossary defines these services as involving the use of technologies and services that provide visual images to link learners and teachers interactively who are remotely located from each other. Some of the references to video are, if not contradictory, at least confusing. Of special concern is the language related to video scheduling. For example, in the Telecommunication Services section, under Digital Transmission Services, the eligibility language says:

A telecommunications service ...provides transmission from an eligible school or library...to other locations.... Components required as an *integral* part of a digital transmission service...are eligible....

The transmission component of a distance learning capability, video services, or interactive television is eligible, but *non-telecommunications* components, such as scheduling service...are not eligible (pp.5-6) [Emphasis added].

Scheduling as an Integral Component vs. as an "Add-on" Service

The State of Wisconsin contracts with a large consortium of state telephone companies known as the Wisconsin BadgerNet Access Alliance (WBAA) to provide access to the state's live, interactive video distance education service. This service is subscribed to by approximately 290 (68%) of our school districts and three public libraries. In the past two school years this video service provided approximately 61,000 learners with just under 3,100 semester or year-long classes/courses. If a typical K-12 class meets three times per week for one hour, and three-quarters of these classes are full-year (i.e., 36-week) classes, this translates into a conservative estimate of 292,950 hours of total instruction taken over the statewide video distance learning network during these past two school years.

One of the integral components in any video network offering live, real-time courses to a large number of schools and libraries statewide is a **scheduling function**. This is especially true in a statewide video network of this magnitude.

The "scheduling function" controls the linkage between the sending and receiving classrooms for every class session offered by the service. In each hourly session there is a potential of having four remotely located classrooms linked electronically for the purposes of learning and instructing anywhere in the state. This is a massive task and scheduling becomes integral to the very operation of the statewide video distance education service. This function is a standard and integral component in the video service contract and should be eligible for E-rate discounts in the very same way that "features typically provided for adequate functionality and performance

when provided as a standard component of a vendor's Internet access service" are eligible in the Internet Access section of the draft 2007 ESL (p.11). This "scheduling" function is not a separate, non-telecommunications "service" tangential to the functioning of the network. It is integral to the functionality and performance of the network because it controls the delivery of video classes across the network and into the correct classrooms at the time the learners are expecting them. This scheduling component is so important that it is included as a bundled service within the WBAA contract.

Our departments were very much concerned that scheduling was not eligible in the 2006 ESL, especially since ESLs prior to 2006 did not specifically state that scheduling was ineligible and applicants have received discounts for scheduling in past years. We believe that scheduling may have been declared ineligible for 2006 without the full knowledge of how important scheduling is to any video network. (Note: Our departments noticed this change in scheduling eligibility only after the comment period closed for the 2006 ESL.) We are doubly concerned that this integral component remains ineligible in the 2007 ESL. Scheduling is integral to functionality and performance of all video, distance learning and interactive TV services, we request that "scheduling service" as a bundled telecommunications component of a statewide video network be E-rate eligible in 2007 and subsequent years, as it has been previous to 2006.

Thank you for listening to our concerns.

Respectfully,

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