

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Schools and Libraries Universal</b>	)	
<b>Service Support Mechanism</b>	)	<b>CC Docket No. 02-6</b>
	)	
<b>Eligible Services List for Universal</b>	)	
<b>Service Mechanism for Schools and</b>	)	
<b>Libraries.</b>	)	

**EMBARQ CORPORATION'S COMMENTS**

Embarq Corporation,<sup>1</sup> on behalf of its incumbent local, competitive local, long distance, and wireless divisions, hereby respectfully comments on the draft Eligible Services List proposed by USAC, the E-rate fund administrator, in response to the Public Notice ("PN") released July 21, 2006 (FCC 06-109).

Embarq proposes three modifications to clarify the language in the draft Eligible Services List. Embarq believes these clarifications will provide schools and libraries, suppliers, Program Integrity Assurance reviewers, and invoice reviewers a more consistent understanding of what is and what not eligible and thereby eliminate some of the problems that have existed to date.

First, under the Internet Access Service category at page 12, the draft list states that "Internet2 access or fees" are not eligible; whereas under the Telecommunications Service category at page 6, the list correctly indicates that the link to Internet2 is eligible: "An eligible

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<sup>1</sup> On May 17, 2006, Sprint Nextel Corporation transferred the Sprint Local Operating Companies that were Sprint's incumbent local exchange carrier operations by means of a stock dividend to shareholders and the creation of a new holding company, Embarq Corporation. The former Sprint Local Telephone Operating Companies are now subsidiaries of Embarq Corporation and are independent of Sprint Nextel Corporation. Additionally, Embarq Corporation's subsidiaries, Embarq Communications, Inc. and Embarq Communications of Virginia, Inc. provide long distance and wireless services.

digital transmission service may be used to connect an eligible location to the Internet or Internet2". The Internet Access Service category description should be modified to be consistent with the language in the Telecommunications Services category (similar to the language used in last year's list at p. 22) as follows:

Internet2 access or fees. (However, a link that connects an eligible entity to Internet2 can be eligible as a telecommunications services. See the Internet Access Funded in the Telecommunications Services Category section for additional information.)

Second, the draft list indicates (pp. 1-2) that digital Transmission Services that are the telecommunications component of Video Service and Distance Learning are eligible. However, the digital Transmission Service alone will not enable Video Service and Distance Learning. Certain equipment – such as Encoders, Decoders, Codecs, and multipoint control units ("MCUs") are required, in addition to the digital Transmission Service or circuit, for the transmission of video and audio signals. Encoders and Decoders (and the combined Codecs) are necessary for the conversion of analog to digital and digital to analog signals. MCUs are necessary to provide the "distance" functionality of Distance Learning by connecting multiple sites. To make clear that funding for equipment integral to Distance Learning and Video Service is eligible, the draft list should be modified to state:

The telecommunications component and equipment required to convert analog signals to appropriate digital video and audio format as well as equipment that connects multiple sites to create the "distance" functionality, of a distance learning capability, video service, or interactive television are eligible for discount, but non-telecommunications components, such as a scheduling service or services for creation, maintenance, and storage of content, are not eligible.

Third, the draft list includes "Fiber optics", "Wireless", and "Satellite" as eligible digital transmission services in the Telecommunications Service category (p. 5). However, none of these are digital transmission services or telecommunications services. Fiber optics, Wireless,

and Satellite are merely methods of transmission and Embarq believes it is confusing to list them with services such as ATM, Frame Relay, etc. All three methods of transmission should be removed from the list. However, Embarq believes it would be beneficial to all interested parties to include Ethernet in the list of eligible digital transmission services. Ethernet is increasingly in demand and it will be helpful to have it clearly stated as an eligible service.

The modifications listed above will clarify the Eligible Services List thereby providing consistency in understanding for all parties involved and therefore Embarq recommends their adoption.

Respectfully submitted,

EMBARQ CORPORATION

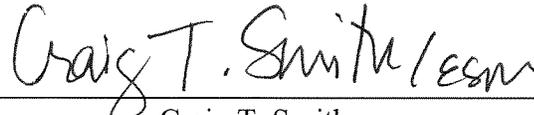
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August 4, 2006

CERTIFICATE OF SERVICE

I hereby certify that a copy of Embarq Corporation's Comments in CC Docket 02-6 was delivered by electronic mail on this 4<sup>th</sup> day of August, 2006 to the parties listed below.

  
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Craig T. Smith

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