

Dear FCC, This is a reply comment to "Comments of Internet2 Regarding National LambdaRail, Inc.'s Petition for Reconsideration or Clarification."

NetworkVirginia is state network operated by Virginia Polytechnic Institute and State University serving telehealth, education, and rural access for an estimated 1.4 million people in Virginia. We currently provide access to both Internet2 and National LambdaRail for the entire Virginia university, K-12, library, and museum community. We currently connect a large number of telehealth entities and have ubiquitous reach in Virginia.

NetworkVirginia supports National LambdaRail's (NLR) petition and disagrees with Internet2's comments. NLR is a national network equal in scope to Internet2 but with unique characteristics and capabilities. For Virginia, NLR offers cost advantages compared to Internet2. We understand Internet2's primary argument to rest on the lack of interconnection between NLR and Internet2. In fact, NLR and Internet2 could easily peer and we are aware NLR has initiated requests to Internet2 in the past to do so. We are disturbed that Internet2 has thus far refused NLR's requests.

In fact, a combination of NLR and Internet2 with appropriate interconnection would yield the broadest possible benefit in terms of ubiquity, participation among state telehealth initiatives, and capabilities.

NetworkVirginia urges the FCC to include both National LambdaRail and Internet2 in the rural health care pilot program. Further, we suggest the FCC consider requiring interconnection among national backbone providers as a condition of eligibility for participation.

Sincerely,

Jeffrey Crowder, Director
NetworkVirginia