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January 20, 2007

Chairman Kevin Martin
Federal Communications Commission
445 12th Street SW
Room #8B-201
Washington, DC 20554

RE: Free National Wireless Broadband Data Service

Dear Chairman Martin,

I am writing this letter on behalf of the Association of Community Organizations for Reform Now (ACORN.) ACORN is the nation's largest community organization of low- and moderate-income families who work together to ensure social justice and to build stronger communities. I speak on behalf of our 330,000 member families in 850 neighborhood chapters in over 100 cities across the country. We call on the Federal Communications Commission to consider the M2Z networks most heartily in their current application.

As you may know, one of the unique aspects of ACORN is that we ensure that our members remain in control of our organization and agenda. This means that ACORN has offered its collective voice to the needs and concerns of low- and moderate-income Americans while shining the light of public scrutiny on their plight. Now with over 36 years of grassroots advocacy under our belt, ACORN has the experience necessary to understand what low- and moderate-income Americans need and want. This fuller understanding is evident in the policies and issues we work on, from taxes to community development and from drugs to communications. Work in the non-commercial radio sector also gives us an understanding of the FCC and its mission.

In the communications sphere, we are committed to ensuring that access to America's communications system is a universal right. For too long, the digital divide has been separating low- and moderate- income Americans from their wealthier compatriots. This is particularly problematic when it comes to Internet service and especially problematic in broadband deployment. The current providers of broadband Internet access have shown

that they are only interested in serving Americans that can afford high monthly subscription rates. Furthermore, due to an almost total lack of price or facilities based competition, the phone and cable companies have indicated that they will continue to operate in a duopolistic framework as long as they can get away with it. Commensurately, it is imperative that the FCC begin to create a regulatory environment that encourages ubiquitous access and substantive competition for the sake of all Americans.

I have reviewed the application of M2Z Networks that is now before the commission and I believe that the proposal represents some excellent opportunities to begin reshaping the broadband marketplace in the United States. M2Z Networks has assembled an impressive application that is highlighted by several compelling public interest obligations that M2Z has voluntarily made conditions of its spectrum license proposal. These conditions include a pledge to pay into but not withdraw from the Universal Service Fund in order to ensure that those monies remain available for true last mile solutions; a pledge to filter indecent content at the network level to protect our children from the dangers of pornography online and to help parents and teachers ensure that our children are getting the best the internet has to offer; and a requirement that M2Z pay 5% of the gross revenues of its premium service into the United States Treasury in order to compensate the American people for the use of their spectrum.

What is most compelling to ACORN, however, are the commitments that M2Z has made to make ubiquitous wireless broadband service a reality. M2Z Networks has made buildout requirements a condition of its application. If M2Z does not build out its network to 33% of the population in three years, 66% in five years and 95% in ten years, the FCC will be empowered to revoke the license and take back the spectrum. This means that a national wireless broadband data network will be available to 95% of the American people within 10 years of the FCC's granting of M2Z Networks application. Furthermore, in addition to solving the availability component of the digital divide issue, M2Z seems poised to solve the affordability aspect of that grave problem as well. To achieve this goal, M2Z will make available a free, search supported service that will provide users with a portable wireless broadband connection at no recurring monthly charge. Users would only need to access a gateway device, plug it into their computer and begin reaping the benefits of a fast, free, family-friendly broadband connection.

ACORN believes very strongly that the M2Z Networks proposal represents an opportunity for the FCC to reshape and improve the conditions of the broadband marketplace in American. Countless studies and academics have told us that one of the keys to ensuring that more and more Americans will have access to good colleges and even better jobs is to introduce them early to pivotal technologies like computers and web-based applications. This type of access can improve the plight of low- and moderate-income Americans by helping to build financial stability and offering real hope for the future to citizens of some of the most at-risk communities in America.

For all of these reasons, ACORN urges the FCC to begin addressing M2Z's application and speed the endeavor to market. Only then will our members and the American people generally begin to reap the social and economic rewards of M2Z's compelling and proposal.

Sincerely,

Maude Hurd

Maude, Hurd
National President,
ACORN

cc: Commissioner Michael J. Copps
Federal Communications Commission

Jonathan S. Adelstein
Federal Communications Commission

Commissioner Deborah Taylor Tate
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Commissioner Robert M. McDowell
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