

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

In the Matter of)
)
High-Cost Universal Service Support) WC Docket No. 05-337
)
Federal-State Joint Board on Universal Service) CC Docket No. 96-45
)

REPLY COMMENTS OF EDUCAUSE

EDUCAUSE, hereby by its attorney, hereby submits reply comments in the Federal Communications Commission’s three Notices of Proposed Rulemaking¹ concerning the high-cost universal service support program.

EDUCAUSE is a nonprofit association whose mission is to advance higher education by promoting the intelligent use of information technology. Membership is open to institutions of higher education, corporations serving the higher education information technology market, and other related associations and organizations.²

Earlier this year, EDUCAUSE released a paper entitled “A Blueprint for Big Broadband”. The paper calls upon the U.S. to adopt a comprehensive broadband plan. One part of the proposed plan calls for the U.S. to create a new Universal Broadband Fund to subsidize the construction of broadband facilities to every home and business in the

¹ *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1467 (2008) (“*Identical Support Rule NPRM*”); *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1495 (2008) (“*Reverse Auctions NPRM*”); *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1531 (2008) (“*Joint Board Comprehensive Reform NPRM*”).

² The current membership of EDUCAUSE comprises more than 2,200 colleges, universities, and educational organizations, including 200 corporations, with 17,000 active members. EDUCAUSE has offices in Boulder, Colorado, and Washington, D.C.; www.educause.edu, e-mail info@educause.edu.

United States over four years. The funds would be appropriated by Congress and awarded to states that contribute a matching amount of funding. The states would then award grants on a market-by-market basis to entities that would build broadband networks providing at least 100 Megabits per second capacity. Award recipients would be required to maintain an open network.

The complete paper and policy proposal is attached to these comments.

Respectfully Submitted,

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