



July 18, 2008

Marsali Hancock, President
Internet Keep Safe Coalition
4607 40th St North
Arlington, VA 22207

Via Electronic Filing

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Martin:

I am writing to visit with you about something I feel very strongly about—that is, the proposal currently before the FCC to open up broadcast spectrum for the use of companies (specifically M2Z) to provide free, filtered high speed Internet access, nationwide. This is a hot topic for the FCC right now, and I am convinced that this decision will become a significant landmark in the history of our nation's technology with the potential to have a positive, lasting impact on families and businesses, nationwide.

Please allow me to explain why.

FREEDOM OF CHOICE FOR CONSUMERS

The M2Z model of ubiquitous, filtered, high-speed Internet will give freedom of choice to several, large under-served communities. The FCC's ruling on this has the power to create a fully connected population by providing every American family with the freedom to choose access to the Internet: freedom to choose access for those in rural locations; freedom to choose access for the under-privileged who can't afford it; and freedom to choose access for consumers who want only "general use" content. For the first time, consumers will have a choice to participate in an environment of exclusively general-audience content. For those who want adult content, all of the current options are still available, including M2Z fee-based content (where ability to pay indicates adulthood).

I recognize that consumers with money and technical knowledge can approximate a general audience content by setting up filters and maintaining tight network administration, but right now, this is a privilege enjoyed only by the wealthy *and* the technologically educated because of the level of technical expertise it requires. To provide content that is appropriate for minors, parents have to understand how operating systems work, software compatibility, and the maintenance of filters—in short, they need a network administrator. My experience, reaching

out to millions of US parents, tells me that most parents are overwhelmed by this task and frustrated that they do not have the freedom to access general-audience content.

M2Z offers a *filtered* service precisely because it is free and ubiquitous—every minor with a laptop will have access. If M2Z offered free Internet service and left it unfiltered, they would be providing adult content directly to children. By maintaining general audience content (TV standards), they provide the essential service to everyone without purveying adult or dangerous content minors.

WHY A FULLY CONNECTED POPULATION IS ESSENTIAL

BACKGROUND

This is not the first time the US has had to render difficult decisions to secure a connected population.

In the early 20th century as telephone technology spread through the country, phone company regulators decided that it was in the public's best interest for all citizens to have a phone line that connected them to their local grid. Ubiquitous coverage was essential to the success and vision of the new technology—so essential that the phone company opted to subsidize basic monthly service fees with money charged to long distance users. The cost of long distance was high—priced beyond most citizens' budgets—so that everyone could have basic access. Looking back, the wisdom in this decision is obvious.

We are at similar cross-roads in our communications history. Right now, the wealthy and middle classes, particularly in more urban areas, are connected. The poor and rural lag behind with either low-speed connections that are difficult to use or no access at all. The M2Z proposal closes the economic divide that currently exists for underprivileged families; it also closes the geographic divide felt by rural families who do not have high-speed options. This connectivity is as essential for success in the modern world as the telephone was to our predecessors.

EDUCATION

To thrive in our educational environment, all children need access to the resources and opportunities provided by high speed Internet. (Our experience working with Connected Nation in Tennessee to provide computers and access has convinced us of this.) University admission has become a paperless process. Teachers require research, make assignments, communicate with parents, and post grades through the Internet. Access to every family, regardless of income and location, is essential to education.

COMMERCE

In a general sense, ubiquitous access is good for the economy. One study estimates that an accelerated national broadband push would provide a nationwide economic stimulus of \$134 billion while creating 2.4 million new jobs

(<http://www.informationweek.com/news/infrastructure/showArticle.jhtml?articleID=206801472>).

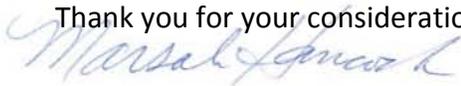
It would also enable all citizens—even the most rural and the most poor—to participate in online trade. Unfortunately, the US lags behind other nations in high speed connectivity, which is an obstacle in our highly competitive global market.

More specifically, the M2Z model will dramatically benefit the current ecosystem of online web development and advertising for both vendors and consumers by creating a new dynamic in Web advertising. Currently, in this environment, most advertising is national, or in some cases, state-wide. For the first time, the M2Z model provides a way for business, including small businesses, to target their advertising to very specific, local markets: this is a benefit to both the advertiser and the consumers (who receive more relevant ads). It means that “Mom and Pop” operations can choose to run ads and coupons to Internet users in their local neighborhood; businesses and communities have more direct access to their consumer base through targeted marketing. This new dynamic in advertising gives industry an added incentive to identify and develop "general audience" content: *Those industries who benefit by having new access to local markets (through targeted ads), are motivated to create and ensure that they have general use content, appropriate for the new network.*

IN SUMMARY

Please consider M2Z's request. I have no bias towards the specific spectrum allocated to this service, but I believe that M2Z's business model is an ideal public-private partnership with long-term benefits for everyone concerned. Because the Internet has become germane to education, college entrance, and private enterprise, we must have a connected population. M2Z's model is an important—and welcome—step in this direction.

Thank you for your consideration,



Marsali Hancock

CC: Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert McDowell