

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:

**Eligible Services List
For Funding Year 2009**

**Schools and Libraries Universal
Support Mechanism**

CC Docket No. 02-6

COMMENTS OF EDLINE

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August 14, 2008

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Edline provides eligible web hosting services to participants in the schools and libraries (E-rate) universal service support program. Edline and other web hosting companies serve thousands of schools across the country that use web-based communication to serve millions of students, teachers, parents and other members of the school community. Edline's comments focus on the proposal in the draft Eligible Services List ("ESL") to make intranet web hosting ineligible. Such a proposal should be rejected because it is inconsistent with the core universal concept of "technological neutrality," it is not supported by FCC precedent and serves no overriding public policy goal. Moreover, the draft ELS proposal would lead to unintended consequences by potentially subjecting students to online threats that currently are mitigated by intranet protections. Finally, the proposal falls outside the scope of the annual ESL update process, which is not intended to be a vehicle for changing eligibility rules. For these reasons, as detailed further in these comments, Edline respectfully requests that the Commission allow web hosting providers to

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continue to provide a full range of eligible web hosting services that are now in use by applicants, including the ability of applicants to provide content that is restricted to users in a school community.

I. Introduction

Edline respectfully submits these comments in response to the Federal Communications Commission's ("FCC" or "Commission") Public Notice regarding the draft ESL for the schools and libraries universal service support mechanism ("E-rate") for Funding Year 2009.¹

Edline provides eligible web hosting services to participants in the schools and libraries (E-rate) universal service support program. Edline and other web hosting companies serve thousands of schools that in turn use web-based communication to serve the needs of millions of students as well as teachers, parents and other members of the school community. The schools and the public served by them would be significantly and adversely affected by a proposal in the draft ESL that would make "intranet web hosting" ineligible.

For many E-rate program applicants, particularly those of small or medium size, the technical complexity and support requirements of an on-site web hosting file server are too great to justify installation. Eligible web hosting services provide a means for such organizations to have a presence on the Internet, providing information about the school or school district such as club and sports activities, student awards, class schedules and assignments and a calendar of upcoming events. Through web hosting services, every teacher and every classroom can potentially have their own web page, not only providing valuable information that empowers families in the educational process, but providing learning opportunities for students in the information age. Web hosting

¹ *Comment Sought on Draft Eligible Services List for Schools and Libraries Universal Service Mechanism*, Public Notice, FCC 08-180 (rel. July 31, 2008).

services operate in a highly competitive marketplace, and the majority of web hosting services, whether in the educational marketplace or otherwise, provide the ability to set up secure content that is available only to some users. Although the term “intranet web hosting” is not defined in the draft ESL, discussion with USAC staff reveal that the intent of the proposal is to make any content that is not available to every user of the public Internet ineligible.² That is, schools would no longer receive support for the portion of a web site that is restricted to only some users.

Edline finds it surprising, given the wealth and variety of Internet services available today, that there would be a public policy objective in restricting the types of services that can be provided under the banner of “web hosting.” The proposal essentially requires that eligible web hosting services follow a “broadcast model.” In traditional broadcasting, the service provider (television or radio station) sends its signal indiscriminately to any and all users who are able to receive it. This broadcast model completely contradicts the purpose of a school web site, which has the primary purpose of targeted communication (such as e-mail) to the school community. Such a limitation has not been a part of FCC requirements for eligible web hosting to date, and stands in stark contrast to Internet services such as e-mail, that target communication to specific recipients.

II. Web Hosting Distinctions Unnecessary in World of Convergence

In a world of converging technologies, such distinctions among web hosting, e-mail and any other Internet services are unnecessary and counterproductive. In fact, the Internet has flourished precisely because the FCC has not imposed unnecessary restrictions on its evolution. Thus, a

² USAC Service Provider call, August 6, 2008. Indicating that “intranet web hosting” is ineligible would not accomplish the objective of making all limited-access content ineligible, even if it was appropriate to do so. The term “intranet” has no agreed-upon meaning in comparison to an “extranet.” In some uses, an intranet refers to web communication limited to a single site, while in others it refers to web communication confined to a multi-site organization. Still in other cases, intranet refers to operation within the organization, whereas it also may apply to employees’ use regardless of whether they are located at work or at home. If the Commission wishes to make any limited-access content ineligible, it should say so in clear language. However, as these comments demonstrate, such an approach would be inappropriate.

preconceived idea about “web hosting” being inherently different from e-mail or other web services is inappropriate given the pace of new and converging technologies. As a result, no additional E-rate eligibility restrictions are warranted.

Edline elaborates on the following arguments in these comments:

- The proposed change is inconsistent with the core universal service concept of “technological neutrality.”
- The proposed change is not supported by any FCC Order, rule, policy or program goal.
- The critical requirements of student safety and security would be significantly undermined if the proposal is adopted.
- The Commission should not impose eligibility restrictions on a commonly employed and beneficial feature of modern web hosting services
- Due to the adverse impact on E-rate constituents, the FCC should limit E-rate eligibility only in circumstances where there is a particularly high and overriding public policy objective.
- The proposed change is beyond the FCC-stated scope of the annual update process, which is “not intended to be a vehicle for changing any eligibility rules.”

III. The Proposed Change is Inconsistent with the Core Universal Service Concept of “Technological Neutrality.”

One of the broad goals articulated in the Commission’s *Universal Service First Report and Order*³ implementing the E-rate support program was the concept of technological neutrality.⁴

³ *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776 (1997) (“*Universal Service First Report and Order*”).

⁴ The Commission first “establish[ed] ‘competitive neutrality’ as an additional principle upon which we base policies for the preservation and advancement of universal service.” *Id.* ¶ 46. It then went on to describe technological neutrality as an outgrowth of competitive neutrality:

We concur in the Joint Board’s recommendation that the principle of competitive neutrality in this context should include technological neutrality. Technological neutrality will allow the marketplace to direct the advancement of technology and all citizens to benefit from such development. By following the principle of technological neutrality, we will avoid limiting providers of universal service to modes of delivering that service that are obsolete or not cost effective. The Joint Board correctly recognized that the concept of technological neutrality does not guarantee the success of any technology supported through universal service support mechanisms, but merely provides that universal service support

Technological neutrality allows for the development of new innovations and technologies that otherwise would have barriers to entry. The concept applies comprehensively to technologies that exist today, technologies that were not in place in 1997 but are available today, and technologies that have not yet been developed. The concept is applicable to broad Internet technologies such as wireline and wireless, and also applies to more specific technologies such as web hosting and e-mail. It is this latter comparison that is particularly applicable to an analysis of web hosting eligibility.

Both e-mail and web hosting are eligible Internet access technologies, and thus both should be treated in a similar fashion, consistent with the concept of technological neutrality. Imagine that a school determines that students should be provided reminders about their homework assignments. This information can be communicated to them over the Internet via an e-mail message or via access to a web site. Similarly, information about extracurricular activities, or a host of relevant information can be transmitted through either one of these communication vehicles. E-rate eligibility rules should allow funding for either type of communication. In fact, e-mail communication can be considered to be merely a special type of web page, so eligibility distinctions should be unnecessary.

If the same logic in the draft ESL were applied to email services, the proposal for web hosting would be analogous to requiring all e-mail messages to be publicly available to all Internet users. This comparison demonstrates that the Commission should not distinguish “e-mail” from

should not be biased toward any particular technologies. We anticipate that a policy of technological neutrality will foster the development of competition and benefit certain providers, including wireless, cable, and small businesses, that may have been excluded from participation in universal service mechanisms if we had interpreted universal service eligibility criteria so as to favor particular technologies. We also agree with the Joint Board's recommendation that the principle of competitive neutrality, including the concept of technological neutrality, should be considered in formulating universal service policies relating to each and every recipient and contributor to the universal service support mechanisms, regardless of size, status, or geographic location.

Id. ¶ 49.

“web hosting” or some other converged technology yet to be invented. All Internet technologies should be allowed to succeed or fail based on an overall set of eligibility criteria.

In further support of this argument, some web hosting providers and other service providers make available an e-mail service to E-rate applicants. Several of these e-mail services are specifically designed for the student population and contain protections to guard them against Internet predators. That is, the ability for students to send or receive an e-mail message to or from “anyone” is restricted. This has been an accepted and eligible practice. For the Commission to decide that such restrictions for an e-mail service are eligible, but that similar protections for a web hosting service are not eligible, is inconsistent and inappropriate.⁵

Thus, the Commission should not make arbitrary distinctions about which Internet technologies may be used for public communication and which may be used for more secure communication. To do so would violate E-rate’s underlying tenet of competitive neutrality. Some school districts may prefer to use e-mail for some communications and web hosting services for others. The latter approach should not be penalized through restrictions on E-rate funding. That is, E-rate administration should not distinguish between the converging forms of web-based and digital communication, such as, *inter alia*, sending an instant message, sending an email, posting a message on a discussion board (public or restricted), publishing information on a web site (restricted or public pages). School officials should be free to use the type of Internet technology that they determine best suits their needs for a particular situation.

⁵ For many communication needs, such as transmitting large files and/or sensitive information, using a secure web page is now widely regarded as best practices and superior to using e-mail to communicate the same information.

IV. The Proposed Change is Not Supported by FCC Precedent or Programmatic Goals

In the *Universal Service First Report and Order*, the Commission determined that “basic conduit access” to the Internet was eligible for Priority One funding.⁶ In that *Order*, the Commission defined what is included in “basic conduit access.”

We conclude that eligible schools and libraries will be permitted to apply their relevant discounts to information services provided by entities that consist of:

- (i) the transmission of information as a common carrier;
- (ii) the transmission of information as part of a gateway to an information service, where that transmission does not involve the generation or alteration of the content of information but may include data transmission, address translation, protocol conversion, billing management, introductory information content, and navigational systems that enable users to access information services that do not affect the presentation of such information services to users; and
- (iii) electronic mail services [e-mail].

Of interesting and significant note is that “basic conduit access” to the Internet includes navigational systems. Edline submits that because the term “navigational systems” is neither restricted nor qualified, it includes navigational systems that have become a standard component of modern web hosting services, namely access permissions to allow users to navigate to information content that is relevant to their needs or positions.⁷ That is, the ability of a user to navigate to particular information is a part of a “navigation system.”

Edline’s research has failed to yield an FCC Order, rule, policy, statement or program rule supporting a finding that the content school and library applicants wish to provide on an eligible

⁶ *Universal Service First Report and Order*.

⁷ The full phrasing indicates that navigational systems are a part of “basic conduit access” if they “do not affect the presentation of such information services to users.” Taking the entire paragraphs as a whole it is clear that this additional phrasing applies to the requirements that the transmission “does not involve the generation or alteration of the content of information...” and not to any requirement that content must be made available to every user of the public Internet.

web hosting service must be available to every user of the public Internet. Rather, Edline believes that the Commission's clear intent was that web hosting services as well as all Internet services would serve as a "vessel" for applicants to insert whatever content they choose in whatever manner they choose.

When the draft ESL was first published, Edline sought a further understanding of the proposal by participating in the August 6, 2008, USAC Service Provider Conference Call. During that call, a USAC representative described a rationale for the change in web hosting as consistent with the "requirement" that web hosting content be available to all users of the Internet. To the extent that this statement was intended to indicate that such a requirement currently exists, Edline emphatically disagrees. Such a "requirement" has never been communicated in any FCC rule, policy, order, or program goal. Furthermore, no information on the USAC web site supports such an interpretation. USAC's role is to administer FCC policies, not to implement its own policies, particularly unwritten policies.⁸

Edline believes that if such login or access restrictions existed, they would be stated in Commission documents, and would be further supported with information on the USAC web site. Given that there has been no credible rationale to support the proposal in the draft ESL, and that the proposal would contravene the goals of universal service, the proposal to make "intranet web hosting" ineligible should be rejected.

⁸ During the same Service Provider Conference Call, USAC staff provided another rationale for the proposed change, namely that the change would be consistent with the long-standing requirement provided in the heading to the Internet Access section of the ESL that "all services must reach the boundary of public Internet space." However, Edline respectfully notes that the servers for a web hosting service are located off-site to the customer's facilities, so the transport of information will always reach public Internet space.

V. The Proposal Would Undermine Critical Student Safety and Security

While the Internet has revolutionized the ability to communicate worldwide and to provide simplified access to incredible educational information, the Internet also contains threats. Schools need to protect students against these threats. In fact, schools are subject to federal statutory requirements under The Children's Internet Protection Act (CIPA)⁹ and may not receive E-rate discounts unless they certify that they have an Internet safety policy and technology protection in place. The Internet safety policy must include measures to protect children from a variety of online threats.

Thus, limiting a web hosting provider's ability to protect students is at odds with CIPA and E-rate certification requirements. By implementing a policy that precludes a school from protecting students from online threats, schools still would be required to implement, and pay for, measures to protect students' access to electronic information, even if E-rate funds did not cover the cost, in order to comply with CIPA, among other statutory requirements.

Schools also have a legitimate responsibility to provide information for the school community, including information that should not be shared with every user of the Internet. i.e., child predators should not have access to names of children who have won an award, or are a member of a school club, or other school-related activities. Photographs of students, with their names, and the location and times that they will be participating in school events, should not be made available on a worldwide basis. Yet this type of information can be safely provided via a standard feature of web hosting services—the ability to restrict content to only some users. If the web hosting proposal is adopted, schools will be in a no-win situation. On the one hand they may be forced to expose identifying information and/or photographs of students to Internet predators.

⁹ The Children's Internet Protection Act, Pub. L. No. 106-554 (2000) (codified at 20 U.S.C. §§ 6801, 6777, 9134 (2003); 47 U.S.C. § 254 (2003)).

On the other hand, determining that they can no longer provide this information to members of the school community is exactly contrary to universal service goals.

Even if there were to be a logical rationale for an additional restriction for eligible web hosting, that rationale must be balanced against other countervailing arguments. Perhaps the strongest of these countervailing arguments is the safety and security of students.

VI. The Commission Should Not Impose Eligibility Restrictions on a Common, Beneficial Feature of Modern Web Hosting Services

Web hosting services operate in a highly competitive marketplace. Even basic web hosting services offered by companies such as Yahoo, Network Solutions or Google provide the ability to restrict web site content to specific users.

Organizations have varying needs in a web hosting service, but it is very common in today's Internet world for a site to restrict content to certain users that must log in with a screen name and password. The Washington Post, for example, provides general news and information (along with classified ads and a host of local information) on its web site, WashingtonPost.com. It allows access to some of this content to the general public, but requires registration— setting up a user name and password— for access to all information on its site. Today, web sites of every type and purpose, whether commercial or personal, restrict certain information and content from the general public.

Much information on the Internet is available to everyone, but much other information is available only on a restricted basis. The draft ESL proposal that schools may only receive funding for information available to “everyone” flies in the face of the realities of today's Internet and the primary goals of a school web site. The primary purpose of a school's web site is not to provide information to an audience of millions, but rather to communicate in a targeted way (such as e-mail or telephone conversations) to the school community. Edline hopes that the Commission ultimately

decides that E-rate applicants should not be second-class citizens in their use of Internet technologies.

VII. Due to its Adverse Impact on E-rate Constituents, the FCC Should Limit E-rate Eligibility Only Where There is a High, Overriding Public Policy Interest

A change to more restrictive eligibility has a detrimental impact to E-rate constituents who have depended on a certain level of funding in the past, and now see that funding suddenly removed. Many of these applicants have entered into long term contracts that can be broken only with monetary penalties.

Applicants typically begin their procurement process and E-rate planning in the spring and early summer, if not earlier. Budgets must be developed, finalized, and approved based on the current understanding of eligibility. Eliminating eligibility for what once was eligible should be carefully considered by the Commission, and implemented only with particularly full notice to applicants who can then make adjustments in their procurement plans and budgeting process.

The FCC appears to understand the adverse impact of tightened eligibility requirements. The ESL used for Funding Year 2004 newly indicated that a dark fiber service was not eligible, whereas in previous years a dark fiber service was eligible. Due to the known impact on applicants and service providers as a result of this sudden change, the FCC provided a transition approach that could be used to light the fiber optic cable and thus make it eligible.¹⁰ In addition, the Commission is now evaluating whether a dark fiber service should be converted back to an eligible service.¹¹

¹⁰See *Schools and Libraries Universal Support Mechanism, Third Report and Order and Second Further Notice of Proposed Rulemaking*, 18 FCC Rcd 26912, ¶49 (2003) (recognizing that an eligible fiber service could be lit with a basic terminating component installed at the customer site.) See also Statement of Commissioner Michael J. Copps, which states in part: "An abrupt change in the eligible services list has left applications from rural schools and libraries in North Dakota and elsewhere high and dry. These rural schools and libraries have built cost-effective networks based on the use of dark fiber. Now the signals have changed and dark fiber is no longer eligible. We need to reverse this recent action and get our policy

Similarly, the ESL used for Funding Year 2006 newly indicated that a video scheduling service was not eligible, whereas applicants in previous years had received funding for video scheduling services. The Commission is now considering a change that would make a video scheduling service eligible.¹²

The Commission is to be commended for now recognizing the adverse impact that such additional eligibility restrictions have on E-rate constituents. Any tightening of eligibility standards should be considered only when there are overriding, strong public policy objectives, and only when considerable notice has been afforded E-rate constituents so that they may comment on the proposal and have sufficient time to adjust their technology plans and budget processes to the new standards. Currently, E-rate applicants are well along in their technology planning and budget processes for the 2009 Funding Year, and E-rate service providers are well along in their marketing efforts. A sudden change to make eligibility of web hosting services more restrictive has no apparent public policy goal that would necessitate the disruption of these efforts.

VIII. The Proposed Change Exceeds FCC-Stated Scope That the Annual Update Process is “Not Intended to be a Vehicle For Changing Any Eligibility Rules.”

The Public Notice releasing the draft ESL for comment indicates through bullet points that there are seven proposed changes. Four of these are described as “clarifications,” one is described as a “reminder,” one is described as an “addition,” and one—the change in web hosting eligibility—is described as a “proposal.” The Public Notice then goes on to say “We also emphasize to commenters that this proceeding is limited to determining what services are eligible under the

regarding support for dark fiber straight once and for all. I see nothing in Section 254(h) that compels the exclusion of dark fiber facilities from E-Rate program support. I hope we can correct this mistake as soon as possible.”

¹¹ *Schools and Libraries Universal Support Mechanism*, Notice of Proposed Rulemaking, FCC 08-173, CC Docket 02-6, ¶ 17 (rel. July 31, 2008) (“2008 NPRM”).

¹² *Id.* ¶ 22.

Commission's current rules; it is not intended to be a vehicle for changing any eligibility rules.” However, restricting eligibility of web hosting services in a way not now indicated by current FCC rules is a change that has an adverse impact on thousands of schools and applicants. These constituents deserve a full notice and comment period in which to provide their opinions regarding a proposed new restriction.

The FCC has recognized this need for a full notice and comment period in past actions regarding the annual update to the ESL. Comments filed in response to the Funding Year 2008 draft ESL included suggested updates and clarifications in the areas of text messaging, firewall services, and anti-virus software, among many others. The FCC chose not to act on any of these requests.¹³ To its credit, the FCC is now considering these and other changes in a full Notice of Proposed Rulemaking (NPRM) released the same day as the draft Funding Year 2009 ESL.¹⁴ Edline respectfully suggests that a significant reduction in the eligibility for web hosting services constitutes at least as great a change in eligibility as the requested changes in text messaging, firewall services, and anti-virus software that the Commission felt could only be treated through a full NPRM process. For this reason, to the extent that the Commission feels that this major restriction in

¹³ *Release of Funding Year 2008 Eligible Services List for Schools and Libraries Universal Service Mechanism*, Public Notice, 22 FCC Rcd 1875 (2007) (stating in part: “As we stated in the July 27th Public Notice, this proceeding is limited to determining what services are eligible under the Commission's current rules and is not intended to be a vehicle for changing any eligibility rules. Therefore, those comments not addressed in the Funding Year 2008 ESL may be more appropriately filed for the Commission's consideration in the general proceeding for the Schools and Libraries Universal Service Support Mechanism in CC Docket No. 02-6. Those comments not addressed may include comments that requested eligibility for new services or products, comments that requested that services or products currently deemed ineligible be made eligible, comments that requested that the Commission take action outside of the scope of this proceeding, or comments that requested that the Commission take action that was not permitted by the short time frame allotted for this proceeding by section 54.522 of the Commission's rules.”).

¹⁴ 2008 NPRM.

eligibility in web hosting is warranted, Edline urges that this be done in the context of an NPRM proceeding and not through the Eligible Services annual update process.¹⁵

IX. Conclusion

Many Internet sites available to the public provide additional content for registered users. Such a feature is a standard component part of web hosting services, and no rationale is apparent for limiting this standard feature in the case of schools and libraries. Such a requirement would serve no public policy goal, and in fact would be highly detrimental, even to the extent of exposing children to harm. Due to these safety concerns and the additional reasons indicated in these comments, Edline respectfully requests that the Commission allow web hosting providers to continue to provide a full range of eligible web hosting services that are now in use by applicants, including the ability of applicants to provide content that is restricted to users in a school community.¹⁶

Beyond this immediate issue, the Commission should understand that the current environment for web hosting service providers and applicants who wish to use web hosting services is already highly complex, with the risk of inadvertent mistakes from cost allocations that USAC requires or potential changes in USAC interpretations. Edline urges the Commission to not add additional complexity to this area, but to undertake an evaluation of how to adhere to program goals

¹⁵ Should the Commission seek a change in web hosting eligibility, it should consider whether eligibility should be expanded rather than reduced, thereby making the current complex cost allocation process more straightforward. The majority of web hosting vendors provide “templates” that allow users to provide and modify their applicant-provided content. These templates are provided as a standard part of the service, and meet FCC rules for an “ancillary” service. However, USAC requires web hosting service providers and applicants to cost allocate such templates, contrary to FCC rules for an ancillary service. Applicants and service providers have no choice but to comply with USAC cost allocation demands, because the alternative approach— holding firm and then appealing an adverse funding decision to the Commission— is too costly in terms of services not delivered until the appeal is finally decided, contrary to the goals of the program to obtain such services with universal service support.

¹⁶ In addition, although Edline’s comments are centered on opposing the new ineligibility of “intranet web hosting,” Edline additionally notes that the definition of web hosting as provided in the proposed Funding Year 2009 ESL could be further improved by modifying the statement that a web hosting service includes “provision of web site traffic (bandwidth).” This statement is vague because it could be most easily interpreted to mean that a web hosting provider supplies an Internet connection to the applicant, when in fact such a connection is provided through a separate contract with an Internet Service Provider. The statement would be clearer and more accurate if it indicated that a web hosting service includes “the provision of hardware and software services that allow web-based content to be displayed.”

while also achieving significantly improved simplicity. Edline stands ready to participate in any further proceeding that would expand rather than restrict the web hosting services that E-rate applicants find to be of high value.

Respectfully submitted,

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I, Jennifer Cetta, certify on this 14th day of August, 2008, a copy of the foregoing has been served via electronic mail or first class mail, postage pre-paid, to the following:

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