

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

In the Matter of	)	
	)	
International Comparison and Consumer	)	GN Docket No. 09-47
Survey Requirements in the Broadband	)	
Data Improvement Act	)	
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Fostering Innovation and Investment	)	GN Docket No. 09-157
In the Wireless Communications Market	)	

**REPLY COMMENTS OF  
THE ASSOCIATION OF PUBLIC TELEVISION STATIONS—  
NBP PUBLIC NOTICE # 30**

The Association of Public Television Stations (APTS)<sup>1</sup> submits these reply comments in response to the Commission’s January 13, 2010, *Public Notice* in the above-referenced proceedings.<sup>2</sup> As APTS has noted in previous filings in these proceedings, local public television licensees increasingly are advancing their mission through innovative multi-platform and internet content and applications. In addition, just as public television licensees have long served as local and regional hubs for the delivery of educational broadcast content, numerous licensees are seamlessly transitioning into roles as the anchors of high-speed broadband networks

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<sup>1</sup> APTS is a non-profit organization whose membership comprises the licensees of nearly all of the nation’s 364 CPB-qualified noncommercial educational television stations. The APTS mission is to support the continued growth and development of a strong and financially sound noncommercial television service for the American public.

<sup>2</sup> *Reply Comments Sought in Support of National Broadband Plan – NBP Public Notice #30*, GN Docket Nos. 09-47, 09-51, 09-137, Public Notice, DA 10-61 (rel. Jan. 13, 2010) (the “*Public Notice*”).

that conduct advanced educational content and services to and between local schools, universities, and libraries.

For example, Utah Education Network (UEN), licensee of public television station KUEN, designs, manages, and operates a statewide educational wide area network (WAN) that links all Utah colleges and universities, all public secondary schools and school districts, most public elementary and charter schools, most public libraries and the Utah state government. All college and university campuses and secondary schools are now linked to the UEN network and the internet with fiber-optic connections that provide at least 1000 megabit-per-second Ethernet connectivity. Through the WAN, UEN delivers a variety of essential educational tools:

- A powerful and effective Internet-based video-conferencing system at 600 locations statewide that is used by thousands of students and instructors for live, interactive instruction;
- Enterprise-level applications such as Blackboard Vista, used by more than 100,000 Utah students and instructors to access classes, syllabi, tests and grades, and the Pioneer Online Library, used by more than 200,000 students and instructors each month;
- Web services that attract 1.3 million visits per month; and
- Professional development courses relied on by thousands of Utah teachers to improve their technology skills and satisfy teacher certification requirements.

In addition, in many rural areas in Utah, UEN has served as an anchor tenant, stimulating additional broadband deployment.

The Louisiana Educational Television Authority, licensee of six public television stations throughout the state, is spearheading an effort to connect every elementary and secondary school in Louisiana to the statewide fiber optic network that currently links Louisiana universities and research centers, as well as Louisiana Public Broadcasting. The connectivity promises exciting possibilities for both rural and urban communities, including live streaming high-definition video for school conferences, lessons taught by experts, and virtual field trips. The Louisiana

Broadband Alliance is seeking funds from the Broadband Technology Opportunities Program (BTOP) at the National Telecommunications and Information Administration (NTIA) to implement the project.

Hampton Roads Educational Telecommunications Association, the licensee of WHRO in Norfolk, Virginia, is playing a leading role in connecting K-12 institutions in southeastern Virginia to the regional ultra-high-speed network. VegasPBS, licensed by the Clark County School District, manages fiber-optic links to more than 400 public school sites, as well as area Emergency Operations Centers and police headquarters. The VegasPBS network provides vast educational benefits as well as important connectivity in case of emergencies.

As the Commission works to complete its National Broadband Plan, we urge it to recognize the essential role that public television stations are playing in the area of broadband deployment as well as in the development of innovative content to drive broadband adoption and advance national priorities.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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