

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act)	GN Docket No. 09-47
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion)	GN Docket No. 09-137
)	
Schools and Libraries Universal Service Support Mechanism)	CC Docket No. 02-6
)	
Comprehensive Review of the Universal Service Fund Management, Administration, and Oversight)	WC Docket No. 05-195

COMMENTS

Gratiot-Isabella Regional Education Service District (“Gratiot-Isabella”), by and through its attorneys, hereby submits these Comments in response to the Public Notice, dated January 13, 2010, calling for additional insight from interested parties regarding the issues raised in the series of Public Notices relating to the National Broadband Plan.¹ Congress required that the Federal Communications Commission (“FCC” or “Commission”) prepare and deliver a National Broadband Plan (the “NBP”) to Congress by February 17, 2010.²

¹ *Reply Comments Sought In Support of National Broadband Plan*, NBP Public Notice #30, DA 10-61 (rel. Jan. 13, 2010). *See also Comment Sought on Broadband Needs in Education, Including Changes to E-Rate Program to Improve Broadband Deployment*, NBP Public Notice #15, DA 09-2376 (rel. Nov. 3, 2009).

² American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, 123 Stat. 115 (2009), § 6001(k). The deadline for submitting the NBP was subsequently postponed to March 17, 2010.

Gratiot-Isabella strongly supports the expeditious deployment of broadband services in rural America. Gratiot-Isabella's jurisdiction covers nine school districts in rural Michigan, and must confront on a daily basis the deficiencies related to the lack of broadband service when attempting to educate the students under its authority. Gratiot-Isabella believes that the steps proposed under the NBP, and the funds distributed by the National Telecommunications and Information Administration ("NTIA") and the Rural Utility Service ("RUS") will eventually lead to the deployment of services in rural areas that will assist in Gratiot-Isabella implementing its educational goals.

However, a vital component to the full implementation and use of new broadband services will be the development of a comprehensive, granular broadband mapping database that will permit rural school districts, such as Gratiot-Isabella, to design and implement the delivery of educational resources to its students throughout their jurisdiction. In particular, Gratiot-Isabella urges the Commission to ensure that the mapping databases are developed in a manner that will permit the information and technology offices in the school districts to determine the availability of broadband services for their students.

As it stands now, most rural school districts are largely unable to determine the ability of students to access bandwidth-rich web-based services at home. In rural areas, the unavailability of broadband service is well documented, and the expense of broadband service can be cost-prohibitive. Exacerbating the difficulties is the fact that many students are not aware of the available opportunities for broadband services, and therefore, are unable to inform rural school districts as to whether they would be able to access the school system's on-line resources if such services were made available.

The unavailability of reliable broadband services in rural areas absolutely thwarts the introduction of new web-based educational programs intended to reach students at their home for learning opportunities after the end of the school day. In light of the wide-spread availability of broadband services available to students attending urban school districts, the implementation of web-based services such as [Blackboard](#) is wide-spread. On the other hand, rural school districts are reluctant to introduce such services due to the uneven availability of internet access generally, and the absence of reliable and up-to-date information relating to the distribution of internet service in particular.

Since rural school districts are largely unaware of the distribution of broadband services within their jurisdiction, and available funds for new programs are scarce, investment in new educational programs is largely avoided so to prevent divergent education experiences for students. Gratiot-Isabella has studied the implementation of web-based solutions, such as [Blackboard](#), YouTube networks containing archived class presentations, or Skype-based homework assistance programs, but has delayed full-scale implementation of the programs since it is impossible to determine whether all students would experience the benefits.

Thus, not only is it necessary for the Commission to take steps to expedite the introduction of broadband services, it is also necessary that the Commission ensure that rural school districts have access to reliable, detailed, and up-to-date information relating to the distribution of the broadband services. Much as an architect prepares blueprints to guide the construction of a building, and a traveler utilizes a road map (or GPS) to arrive at its destination, a detailed map of the distribution of broadband services is absolutely necessary before a rural school district can justify undertaking an expensive new educational initiative.

Gratiot-Isabella envisions the development of a universally-accessible and verifiable mapping system that would permit interested parties to confirm with reasonable certainty the level of broadband services to its students, and negotiate for the lowest rates. To make such a system valuable to a rural school district, the mapping program must be able to permit the school district to confirm by address the level of service available to a student. While Gratiot-Isabella can appreciate that broadband service providers are interested in keeping their service information private for proprietary reasons, in light of the overriding public interest benefits associated with the implementation of broadband services in rural areas, Gratiot-Isabella would argue that the use of public rights-of-way by these broadband service providers should create the obligation that they consistently submit true and correct information on a timely basis. Further, the correction of information previously submitted but discovered to be incorrect, must be permitted by any party, subject to reasonable safeguards.

Not only would this mapping system permit a rural school district to determine whether broadband service is available to its students, the mapping system will also expedite the implementation of new broadband services by eliminating costly overbuilds and permit the sharing of service conduits to the home. This level of collaboration would both encourage rapid build-outs, and would serve to keep broadband costs down for residents, businesses, and local governmental agencies.

Therefore, Gratiot-Isabella strongly urges the Commission to take all possible steps to ensure that a national broadband mapping system is implemented to encourage the use of broadband services for educational uses. The mapping system is vitally important for rural school districts to plan and implement new web-based educational services that will extend the school-day experience for students within their jurisdiction. Not only will rural school districts

be able to determine who would have access to broadband services on a granular level, the mapping system will have the additional impact of reducing the costs associated with the implementation of new broadband services.

As it has been said, *Knowledge is Power*, and Gratiot-Isabella respectfully requests that the Commission take all possible steps to ensure that the knowledge gained from a detailed broadband mapping system leads to the wide-spread use of the power of broadband services for our Nation's students.

Respectfully submitted,

GRATIOT-ISABELLA RESD

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