

To: FCC

Re: CIPA regulations, Common Carrier Bureau - NOTICE
OF PROPOSED RULEMAKING

Regarding the implementation of new CIPA rules, as a librarian and technologist I have a few comments.

In many school districts, CIPA has been implemented by the use of filters—provided by commercial entities. These companies guard their lists and processes so school districts are at the mercy of the provider.

Consequently, often school districts use filters that block entire categories of sites, and cite “CIPA” as the reason, even though the law does not require this. This reflects the poor understanding of CIPA by education communities across the country, but also reflects the “hold” the industry of filtering companies has on the schools.

When students are blocked from sites, as this article notes: <<http://www.ednetnews.com/story-2332-3.html>>
"Despite overwhelming agreement among parents, teachers and principals that the effective implementation of technology in schools is crucial to student success, students say they step back in time when they enter the school building each morning, according to today's release of the 2008 Speak Up survey." "Through Speak Up, students consistently report they are inhibited from effectively using computers or the Internet at school. Besides lack of time at school to use technology, students (6th-12th grade) report their technology use is impeded by the ever present school filters or firewalls which block access to websites they need (43 percent), teachers who limit their technology use (35 percent) and rules that limit their use of technology at school (26 percent)."

One thing the regulations could strengthen is requiring districts to activate features which allow local campuses/technologists to disable the filter as needed for educational assignments. While this language is in CIPA, it is rather vague and many districts ignore that.

I suggest an investigation of the methods of filtering used, and their effectiveness in schools, done by the FCC. The companies will respond to federal regulations regarding how they provide their services, when they may not be responsive to districts' needs, and in fact, “hype” the issue of CIPA in order to sell their products through fear-based tactics.

Students begin regarding school networks as too restrictive, and teachers are disempowered from using excellent web 2.0 tools due to the lack of information surrounding this issue. The innovators in schools are frustrated at the way the filters are implemented, too often limiting their efforts to provide global learning experiences for their students using web 2.0 tools.

Please consider investigating the actual implementation of these faulty products and consider how the regulations can provide clearer guidance to schools about disabling the filters for

appropriate educational uses. See documents like ISTE's NETS for students and the NSBA's statement on Social Networking to see the kinds of tools that students should be enabled to use.

Thank you.

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