March 10, 2010

Mr. Blair Levin, Executive Director
Omnibus Broadband Initiative
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Coordinating Entity for Anchor Institution Networks in the National Broadband Plan
Ex Parte Communication, 47 C.F.R. § 1.1206
GN Docket Nos. 09-47, 09-51, 09-137

Mr. Levin:

The National Association of Telecommunications Officers and Advisors ("NATOA") submits this letter to highlight the need for a coordinating entity for Anchor Institution Networks in the National Broadband Plan. NATOA supports the letter filed on this same topic by the American Library Association ("ALA") on March 5, 2010. We agree that "a coordinating function at the national level [is] necessary to assure that equitable and affordable broadband access is available through all types of interconnected 'anchor institutions.'"

NATOA also signed on to the Schools, Healthcare and Libraries Broadband (SHLB) Coalition comments that proposed the creation of a coordinating entity. In those comments, the coordinating entity was referred to as a "Unified Community Anchor Network" or "UCAN." As with ALA, I believe it is important to highlight that NATOA was only a signatory to the first of two letters proposing an entity called UCAN.

Also, like ALA, NATOA believes that the broader description of what we support, a "coordinating entity," is most appropriate at this time. The distinction from the current UCAN proposal is an important one. Most notably, NATOA rejects any argument that the support of *some* anchor institutions should be put before the support of others. NATOA believes that it is absolutely critical that the coordinating entity be committed to supporting all anchor institutions.

The types of local government buildings that need to be involved in the coordinated support are more than just schools and libraries (although those are important). They include institutions used for public safety, public health centers, community media centers, social service organizations, courts, colleges and universities, recreational centers, city halls, and so on. The coordinating entity that is developed must support these organizations.

NATOA agrees with ALA that the specific model used for the coordinating entity should be the product of considering numerous proposed models. To limit the entity to a specific model, at this time, before full consideration, would be counterproductive. Ultimately, whatever model is developed for the coordinating entity, NATOA believes that it is critically important

that local government anchor buildings be supported and for this to be done properly, it is necessary for local governments to be involved in the development, governance, and management of the coordinating entity.

Pursuant to Commission rules, please include a copy of this notice in the record for the proceeding noted above.

Sincerely,

Ken Fellman
President
NATOA

Cc: Marlene Dortch, Secretary, Federal Communications Commission