

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Schools and Libraries Universal Service Support Mechanism	)	CC Docket No. 02-6
	)	
A National Broadband Plan For Our Future	)	GN Docket No. 09-51
	)	
	)	

**COMMENTS OF VERIZON AND VERIZON WIRELESS**

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**I. INTRODUCTION AND SUMMARY.**

Updating the schools and libraries (“E-rate”) program to better serve the evolving broadband and other needs of program beneficiaries is an important component of the Commission’s universal service broadband strategy and the National Broadband Plan.<sup>2</sup> The Commission should ensure that E-rate keeps pace with advances in technology, but at the same time the Commission should avoid straying from the fundamental purpose of the program, which is to help schools and libraries get connected and stay connected. Sweeping changes to E-rate are not necessary. E-rate is already a successful broadband program that has worked to connect nearly 100 percent of schools to the Internet, virtually all of which have broadband.

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<sup>1</sup> In addition to Verizon Wireless, the Verizon companies participating in this filing (“Verizon”) are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

<sup>2</sup> *Schools and Libraries Universal Service Support Mechanism, A National Broadband Plan For Our Future*, Notice of Proposed Rulemaking, 25 FCC Rcd 6872 (2010) (“*E-rate Broadband NPRM*”); *Schools and Libraries Universal Service Support Mechanism*, Report and Order and Further Notice of Proposed Rulemaking, 25 FCC Rcd 6562 (2009) (“*ESL FNPRM*”); FCC, Omnibus Broadband Initiative, *Connecting America: The National Broadband Plan*, <http://www.broadband.gov/plan>, at 235-40 (March 16, 2010) (“*NBP*”).

The Commission should adopt limited enhancements to E-rate that would further expand the program's support for broadband. In particular, the Commission should increase access to funding for wireless broadband services—including wireless Internet access applications, modems, EvDO cards, and routers—and could explore a pilot program to increase access to “virtual classrooms.” Schools and libraries increasingly rely on wireless solutions as important administrative and educational tools. Internet-based classroom tools are also increasingly vital in a modern learning environment, and to ensure students in schools with a substantial number of low income households have equal access the Commission could consider a targeted pilot program. In addition, the Commission could support dual-use (voice and data) network options and broadband integration by providing an incentive for program beneficiaries to adopt these solutions.

Other proposals such as supporting dark or leased fiber, reducing support for telecommunications and Internet access services in favor of internal connections funding, and eliminating support for web hosting services altogether would not serve the Commission's broadband agenda. Expanding E-rate to cover dark and leased fiber solutions could cause Universal Service Fund (USF) support to be wasted on stranded facilities or used for the deployment of facilities that do not serve an “educational purpose.” Reallocating funds to internal connections (inside wiring, etc.) would only reduce E-rate funding available for broadband, which under the rules has priority over internal connections funding. Currently, all E-rate applications for broadband support are fully funded each year. In addition, web hosting services can provide tangible educational benefits. The Commission, however, should limit support for web hosting that is bundled with a school or library's Internet access service—which was the Commission's original intent in making web hosting an eligible service.

With respect to various proposals to change E-rate administrative procedures, the Commission should modify the Eligible Services List (ESL) to reflect priority one status for certain information services. Priority one VoIP and text messaging services do not fit neatly into the two existing ESL priority one categories—telecommunications and Internet access. The Commission should decline to eliminate the Form 470 posting requirement where there are state and local competitive bidding procedures that apply, and also decline to limit opportunities to comment annually on the ESL. These are not difficult or controversial administrative requirements, and neither approach would be an improvement over current processes.

**II. E-RATE IS ALREADY A SUCCESSFUL BROADBAND PROGRAM AND WILL PLAY AN IMPORTANT ROLE IN THE COMMISSION’S LONG-TERM BROADBAND STRATEGY.**

E-rate provides critical funding for schools and libraries to gain high-speed access to the Internet, and has since the program’s inception. Requests for broadband funding are considered “priority one,” and each year the program has fully funded all requests for Internet access support. *E-rate NPRM* ¶ 17. Because of this focused attention, backed up by sufficient funding, nearly 100 percent of public schools have Internet access, and 97 percent of schools reach the Internet over broadband connections. *Id.* ¶ 3 n.3.<sup>3</sup>

**A. The Commission Should Enhance Access To E-rate Funding For High-Speed Wireless Services.**

More and more consumers are choosing mobile services for their voice and data communications needs. These trends will accelerate as wireless broadband speeds increase with the widespread deployment of Long Term Evolution, or fourth-generation wireless services.<sup>4</sup>

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<sup>3</sup> For those few schools that still do not have broadband, the Commission could prioritize some amount of E-rate funding if they apply for support.

<sup>4</sup> See, e.g., Light Reading, “Verizon Says LTE Will Match 3G Footprint in 2013”

The National Broadband Plan's analysis indicates that 4G wireless broadband service is likely to be an effective solution for extending broadband to areas that do not have broadband today.

NBP, *Broadband Availability Gap* at 146. As important anchor institutions in rural and other areas, schools and libraries also increasingly rely on wireless solutions for both administrative and classroom needs. Given these trends, the Commission should update the ESL to explicitly include eligibility for wireless Internet access applications, wireless modems, EvDO cards, and wireless routers.

***Wireless Internet Access Applications.*** Wireless Internet access services are properly eligible for E-rate support when “used for an ‘educational purpose.’” *ESL FNPRM* ¶ 39.

Although the Commission generally focused on wireless services used on library or classroom property in determining whether this requirement has been satisfied, it has also found that wireless telecommunications services that are used off-premises, such as a on a school bus or by teachers accompanying students on a field trip, serve an educational purpose. The addition of certain wireless Internet applications to the ESL would be fully consistent with that precedent.

Off-premise use of new wireless Internet applications can be as essential to a school's educational mission as the off-premise use of wireless telecommunications services described in the *Schools and Libraries Second Report and Order*.<sup>5</sup> For example, Verizon offers a GPS, location-based service that can provide directions to all school activities outside of the primary

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(Continued . . .)

[http://www.lightreading.com/document.asp?doc\\_id=193226](http://www.lightreading.com/document.asp?doc_id=193226) (discussing Verizon Wireless plans to launch 4G service with 5-12 Mbps average download speeds in up to 30 markets, covering 100 million people, by the end of 2010, everywhere there is 3G today in 2013, and even in places that do not have 3G coverage today in 2013-14) (June 15, 2010) (last visited July 6, 2010).

<sup>5</sup> *Schools and Libraries Universal Service Support Mechanism, Second Report and Order and Further Notice of Proposed Rulemaking*, 18 FCC Rcd 9202, ¶ 19 (2003) (“*Schools and Libraries Second Report and Order*”).

school facility. This technology is also being used in geography, science, and math instruction. Other products can track the location of bus drivers, facility workers, and even special education students that travel between schools throughout the day, by forwarding information periodically to a web-based application providing exact location points. Wireless services are also available to schools that can track the location of buses as well as monitor vehicle speed and stop and start coordinates, which enhances a school's management of its school bus fleet.

Such wireless Internet access service applications are not necessarily "used on library or classroom property," but nonetheless serve an important educational purpose: They permit student data, school bus locations, educational assessment information, and emergency directives and planning information to be accessed off-premises, in a secure manner, which increases the efficiency and productivity of the educational process. These applications should be eligible for support for the same reasons that "a school bus driver's use of wireless telecommunications services while delivering children to and from school" is considered an educational purpose. *Schools and Libraries Second Report and Order* ¶ 19 n.28.

***Wireless Modems, EvDO Cards, and Wireless Routers.*** Many schools are purchasing wireless laptops and notebooks to enhance learning initiatives, which enable students and teachers to use wireless Internet capabilities to access important information for anytime, anywhere educational applications. Wireless modems, EvDO cards, and wireless routers that are used for such educational purposes should be eligible for E-rate funding, even though such use may not always occur on library or school property.

There is no question that wireless Internet access is a supported service under the Internet access category on the ESL. It is also well established that wireless internal connection equipment, including antennas, is supported under the internal connections category. *ESL*

*FNPRM*, Appendix D at 14. Wireless modems, EvDO cards, and wireless routers also all fit within this category but are not specifically enumerated on the ESL. To avoid uncertainty, they should be specifically listed. A wireless modem serves the same function as a cable modem (which is listed) in connecting an eligible customer to the Internet. *Id.*, Appendix D at 8. An EvDO card, too, acts exactly like any other wireless connection to the Internet, and therefore should be supported. “Routers” are listed as eligible in a general sense. *Id.*, Appendix D at 13. But to facilitate the processing of funding requests and remove any uncertainty, the ESL should clearly specify that wireless routers are included.

***Wireless Services Outside of School.*** Mobility is a growing component in the array of learning tools, and schools are also looking to deploy mobile curriculum solutions, such as “virtual classrooms,” that enable students to conduct research or homework outside of the traditional classroom setting using secure wireless connections. In the *E-rate NPRM*, the Commission proposes to adopt the National Broadband Plan’s recommendation to provide full E-rate support for wireless Internet access service used with a portable learning device that is used off-premises. *E-rate NPRM* ¶ 45. Verizon agrees that the Commission should explore support for mobile learning environments, particularly for students who otherwise lack access to broadband services in their homes. Concerns about the effect of this support on the size of the fund, however, suggest that the Commission proceed initially with pilot programs.

The proposal to support off-premises wireless Internet access (as well as other proposals to help low income households gain broadband access) has the potential to lessen the digital divide between those students who have broadband at home and those students who do not. *Id.* ¶ 46. The Commission points to programs in Maine and Virginia that provided laptops to students which, together with connectivity to the Internet in the home and school environments, were

shown to improve student performance. *Id.* ¶ 47. Verizon has participated in a similarly successful program in Texas.

There are, however, more difficult concerns about funding an expansion of E-rate to include off-site student access to virtual classrooms—laudable as that may be. *Id.* ¶ 51. The Commission asks “how funding for wireless connectivity might increase” and whether expanding E-rate to include off-site student access to virtual classrooms “would limit the ability of eligible users to obtain other services.” *Id.* The reality is that expanding E-rate to allow schools to provide wireless connectivity for *all* students, potentially including broadband-enabled laptops or other wireless devices, could be prohibitively expensive. In the nation’s schools there are 56 million students projected to enroll in grades kindergarten through 12th (K-12) for the upcoming 2010-11 school year.<sup>6</sup> Even if wireless connectivity to virtual classrooms could be had at a total cost of \$100 per student (which is not realistic given the price of necessary equipment alone), the cost to the fund would be approximately \$5.6 billion. Demand for such services could either crowd out support for other services that schools need, or create pressure for a significant increase in fund size. And a dramatically expanded E-rate program would run counter to the Commission’s commitment in the NBP to keep the USF at roughly the same level, as well as the Commission’s section 254(b)(5) obligation to be fiscally responsible with universal service funding. *See Rural Cellular Association, et al. v. FCC*, 588 F.3d 1095, 1102 (D.C. Cir. 2009) (holding that the Commission must “balance the risks of excessive subsidization with the principles set forth in § 254(b). . .the Commission must consider not only the possibility

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<sup>6</sup> See U.S. Census Bureau, Newsroom, *Back To School: 2010-2011* [http://www.census.gov/newsroom/releases/archives/facts\\_for\\_features\\_special\\_editions/cb10-ff14.html](http://www.census.gov/newsroom/releases/archives/facts_for_features_special_editions/cb10-ff14.html) (June 15, 2010) (last visited July 6, 2010).

of pricing some customers out of the market altogether, but the need to limit the burden on customers” who pay for the fund.).

The Commission appears to recognize as much, asking in the *E-rate NPRM* how, if at all, student wireless connectivity to virtual classrooms may be achieved on a smaller scale or on a more cost-effective basis. *E-rate NPRM* ¶ 51. As the National Broadband Plan recommends, providing a limited amount of funding for wireless services within a pilot program could help determine demand levels and cost-effectiveness. In order to maximize the educational benefit, such a pilot program may be appropriately focused on students in low income areas and schools, who are least likely to have Internet access at home. Today, a school’s E-rate reimbursement percentage is tied to participation in the federal free and reduced lunch programs. A similar approach with this pilot program may work. In addition, the Commission could seek pilot program participation from equipment manufacturers and service providers, similar to the approach the Commission plans to take with a potential broadband discount for households that participate in the universal service Lifeline program. NBP at 172-73.

A pilot program would also permit the Commission to evaluate potential mechanisms for ensuring that off-premises access is consistent with the Children’s Internet Protection Act and the Protecting Children in the 21<sup>st</sup> Century Act, and for ensuring that remote access to virtual classrooms is limited to educational purposes. *E-rate NPRM* ¶¶ 49-50. Widely available technical solutions such as web portals can effectively route virtual classroom broadband traffic through existing firewalls and other security software already in use by schools and libraries. The same online screening tools and other cyber-security tools used by schools and libraries can be applied to remote access interfaces.

*Dual-Use Network Solutions.* The clear trend, among commercial enterprises and schools and libraries, is toward converged services that blur traditional lines between voice and data products. The proliferation of high-quality VoIP services over the last few years has made converged voice and data services more attractive and more economical. The benefit of these broadband-based services is a long-run savings from maintaining dual-use network connections instead of multiple, service specific “pipes.” In light of the cost savings and other benefits associated with converged services, prioritizing E-rate support for broadband services over support for “voice” services is unnecessary to advance broadband adoption. *Id.* ¶ 59. And, in light of blurred lines between voice and other services when carried over a broadband pipe, a rule that attempted to assign a lower priority to “voice” would be difficult to implement. *Id.* Instead, the Commission could consider ways to encourage schools and libraries to adopt IP services that provide voice and data over the same facility. The Commission has already taken an important step towards encouraging the shift from traditional voice services to advanced services by including interconnected VoIP on the ESL.

**B. The Commission Should Avoid Changes To E-rate That Would Detract From The Broadband Agenda.**

*Dark and Leased Fiber.* Expanding access to low-cost fiber solutions is a worthy objective. *Id.* ¶¶ 52-54. Using E-rate support for dark or leased fiber solutions, however, does not make sense. *Id.* ¶ 54. To provide any benefit, dark fiber has to be built, “lit,” operated, and maintained. In building dark fiber networks, there is a (sometimes) high, one-time cost to extending last mile facilities, particularly in established residential areas where schools and libraries are very often located. Service providers are able to weigh and incorporate this cost into service pricing, but schools and libraries that opt to acquire their own fiber networks in many cases would need to front these costs themselves, which if paid for with E-rate funding could put

a significant burden on the program in any one year.

To light a self-provisioned dark fiber network, schools and libraries also would need to make investments in transmission electronics, and employ personnel to engineer, install, and maintain the network. These additional expenses can be significant. In light of the uncertainty of funding for the equipment and services that are necessary to transform dark fiber into a functioning network, dark or leased fiber presents the real possibility for stranded investment of E-rate dollars. Rather than using E-rate to support projects that are largely unknown quantities, the Commission should focus priority one Internet access funding on services with known, definite benefits. For example, the E-rate program already supports high-bandwidth, fiber-based services such as gigabit Ethernet.

In addition, the *E-rate NPRM* suggests that schools could receive E-rate support for dark fiber obtained from third-parties that are not telecommunications carriers, such as state, regional or local government entities. *Id.* ¶¶ 52, 54. It is not at all clear that municipalities or other government entities are or would want to be in the E-rate service provider business. E-rate providers must comply with a battery of Commission rules and USAC procedures, centered in large part on a competitive bidding process that involves provider registration and various certifications, among other things. Dark/leased fiber providers that own fiber lines largely for their own needs are generally not in the communications business and will, in many cases, be ill-suited to comply with E-rate program requirements.

***Prioritizing Internal Connections Funding.*** The Commission seeks comment on several proposals to modify the distribution of priority two funding for internal connections (routers, hubs, inside wiring, etc.), including proposals that could cut some priority one funding to free up more support for internal connections. *Id.* ¶¶ 69-83. There may be more equitable ways to

allocate the limited amount of priority two funding available after priority one requests for telecommunications and Internet access services are fully funded. The Commission should not, however, cut priority one funding short. *Id.* ¶ 74. E-rate is a broadband success story precisely because schools and libraries have predictable, ready access to funding for both their basic telecommunications and high-speed Internet access needs. As discussed above, some 97 percent of public schools have broadband connections to the Internet. NBP at 236.

The core purpose of E-rate is “to ensure that eligible schools and libraries have affordable access to modern telecommunications and information services that will enable them to provide educational services to all parts of the nation.” *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, ¶ 424 (1997) (“*First Report and Order*”). It would be inconsistent with this objective to limit school and library access to critical funding for basic telecommunications and Internet access services so that some program beneficiaries may draw additional funding for inside wiring, routers, hubs, and other secondary priority equipment. This approach would also run counter to the Commission’s announced intention in the National Broadband Plan to make sure that “anchor institutions” such as schools and libraries have access to affordable high-capacity circuits. *E-rate NPRM* ¶ 2.

In support of proposals to free up more internal connections funding, the *E-rate NPRM* discusses the many unfunded applications for such support each year. *Id.* ¶¶ 65-66. That the E-rate program is unable to fund all requests for priority two services, however, is not a reason to limit funding for priority one services. Prioritizing telecommunications and Internet access funding follows directly from the 1996 Act. *First Report and Order* ¶ 424. As with most federal subsidy programs, demand for E-rate subsidies will always exceed supply of funding—no matter the limit. Because E-rate functions reasonably well, it is not burdensome for schools and

libraries to submit requests for priority two funding even though they are unlikely to be funded, and the beneficiary may fully expect that it will need to pay for internal connections with other resources. Nonetheless, the most needy schools and libraries (those with the highest discount percentages) do still, collectively, receive hundreds of millions of dollars annually in internal connections support. *E-rate NPRM* ¶¶ 62-64. This is a fair policy trade-off. E-rate was designed, foremost, to bring the benefits of modern communication services to a school or library’s doorstep. The program was not designed to provide funding deep into an applicant’s operating budget for optional products that address an individual beneficiary’s specific local needs or objectives. It is reasonable to give beneficiaries access to additional support when there is left-over funding after honoring all priority one requests, but it does not make sense to short-change priority one funding because schools and libraries—not surprisingly—are also willing to put priority two funding to good use each year.

***Support for Web Hosting Services.*** The Commission seeks comment on removing “web hosting” services from the ESL or moving web hosting from priority one to priority two. *ESL FNPRM* ¶¶ 37-38 (citing Reply Comments of State E-rate Coordinators Alliance [SECA] at 3). Broadly speaking, web hosting involves arrangements with providers to service and maintain websites and Internet portals on the provider side of the network divide. For schools and libraries, these services often include secure, controlled student access to the Internet and virtual classrooms facilitated by hosted solutions. Often, web hosting is economical for schools—and the E-rate program—because provider-hosted web portals allow for high-speed and high-quality access without need for schools and libraries to purchase additional equipment and facilities. When bundled with an Internet access service, web hosting is sufficiently connected to the Internet service itself to be E-rate eligible for priority one Internet access funding. *Id.* ¶ 37

(discussing earlier Commission decision to add web hosting to the ESL).

The Commission and SECA, however, are concerned about interpreting a “web hosting” service too broadly. *Id.* To address these concerns and maintain funding for important web hosting services that schools and libraries rely on, the Commission should keep web hosting on the ESL but limit support to beneficiaries that bundle web hosting with their Internet access service. This approach is consistent with the Commission’s original intent in adding web hosting to the ESL, which was based on “a presumption. . .that web hosting was to be provided by an Internet service provider” engaged by the school or library “as part of a bundled service offering.” *Id.* ¶¶ 37-38.

### **III. THE E-RATE PROGRAM CAN FUNCTION BETTER.**

#### **A. Reworking The Eligible Services List Is A Simple, Worthwhile Change.**

The Commission proposes to expand the Internet access category in the priority one bucket on the annual ESL to include certain information services. *ESL FNPRM* ¶ 44. The new category would be called “Internet access and information services.” *Id.* This makes sense. Accounting for certain new services—particularly VoIP<sup>7</sup> and text messaging—on the ESL has been problematic. These services are widely used by schools and libraries even though the Commission may consider their regulatory classification to be an open question. And the current ESL only allows for two priority one categories, telecommunications and Internet access, even though VoIP, text messaging, and potentially other services are being used by schools and libraries often in place of traditional local and long distance circuit-switched services. For that reason, there is little dispute that these services should be afforded priority one status, even

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<sup>7</sup> As a related matter, the Commission should clarify that when it added VoIP to the ESL as a priority one service, the Commission intended to also include the necessary network services and facilities needed for the IP solution to function.

though they do not fit neatly within the current structure of the ESL.

**B. Eliminating The Form 470 And Limiting Opportunity For Public Comment On The Eligible Services List Would Not Be An Improvement.**

The Commission should not adopt its proposal to eliminate the Form 470 posting requirement for schools and libraries that are subject to state or local competitive bidding requirements. The hallmark of the Commission's procedures for distributing E-rate support is the competitive bidding process that begins when a school or library posts a Form 470 to describe desired services and seek bids from federal E-rate service providers that satisfy program requirements. *First Report and Order* ¶¶ 30, 480-83, 487, 575-76. This process ensures that all E-rate service providers have notice and an opportunity to submit a bid in response to the request and become the beneficiary's E-rate provider. If the Commission's concern is that the Form 470 is cumbersome, then the Commission should simplify the form.

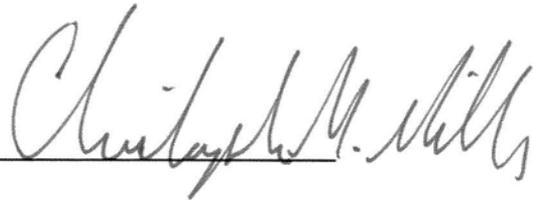
In addition, the Commission should not limit opportunities for public comment on proposed changes to the ESL. It is not clear from the *ESL FNPRM* whether the Commission's proposed modifications to the ESL revision process would eliminate the present requirement for public comment. *ESL FNPRM* ¶ 46. The Commission should make clear that by giving itself "flexibility to provide, for example, more detailed explanations regarding changes to the ESL in an order when it deems necessary," it would not be giving itself the authority to make changes to the ESL without first seeking public comment. *Id.* The ESL is an important program tool for many beneficiaries and service providers. Changes to the ESL drive product offerings and purchasing decisions. It would not be appropriate to modify the ESL without an opportunity for public input pursuant to standard Administrative Procedure Act requirements. *See* 5 U.S.C. § 553. The Commission and the industry have, for years, gone back-and-forth regarding changes to the important instructions for another universal service form, the Form 499A revenue

reporting form, that are adopted without notice and comment.<sup>8</sup> It would not make sense to expand this procedure, which is already cause for concern, to the E-rate program.

#### IV. CONCLUSION.

The Commission should make the appropriate changes to E-rate discussed herein to ensure that the program keeps pace with advances in technology in the broadband age. At the same time, the Commission should avoid straying from the fundamental purpose of the program and recognize that E-rate is already a successful broadband initiative.

Respectfully submitted,

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<sup>8</sup> See, e.g., Comments of Verizon and Verizon Wireless, *Request for Review of Decision of Universal Service Administrator by Global Crossing Bandwith Inc.*, WC Docket No. 96-45 (Oct. 1, 2009).