

**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
)	

**REPLY COMMENTS OF THE
HISPANIC INFORMATION AND TELECOMMUNICATIONS NETWORK, INC.**

Introduction

The Hispanic Information and Telecommunications Network, Inc. (“HITN”) respectfully submits this reply in response to comments filed in the above captioned Notice of Proposed Rulemaking. HITN strongly supports comments in favor of the Federal Communications Commission’s (“FCC” or “Commission”) proposal to include full E-rate funding for wireless Internet access services and portable learning devices that are used off school premises. HITN also supports proposals to streamline the application process. In particular, HITN supports the National Hispanic Media Coalition’s (“NHMC”) proposal “to eliminate the technology plan requirement, filing of Form 470, and the multi-step process associated therewith.”¹

Background

HITN was established in 1983 as a non-profit organization, which provides engaging, educational, and entertaining programming to Hispanic American audiences. HITN's mission is dedicated to using telecommunications technologies for the advancement of Hispanic Americans and other minority audiences in the U.S. and Puerto Rico. The network invites individuals and families to live fuller lives and enables them to serve as an ever-growing engine of intellectual

¹ Comment filed by National Hispanic Media Coalition on Jul. 9, 2010, CC Docket No. 02-6.

power and progress. Reaching over 35 million households, individuals can view the network nationwide on the following networks: DirectTV; Dish Network; AT&T U-verse and Verizon FiOS as well as on the following selected cable systems in key Hispanic markets: Time Warner Cable (NY, NJ, and TX); Comcast (IL, CO); Charter (CA, NV, WA, and GA).

HITN is also the largest holder of Educational Broadband Service (“EBS”) spectrum in the United States, with spectrum in more than 80 markets covering over 100 million people in the U.S. and Puerto Rico. Through a partnership with Clearwire Corporation, HITN is in the process of making available WiMAX 4G wireless services to educational institutions and non-profits nationwide using this spectrum.

Discussion

Many commenters support the Commission’s proposal to fund wireless services through the E-rate program.² These commenters also recommend: the E-rate program support all equipment related to the provision of wireless services (e.g. personal computer cards and connection cards) as a transmitter component under the Internal Connections category and that “tying support to ‘eligible locations’ is an outdated concept” that needs to be changed.³ HITN strongly supports these recommendations.

Through its partnership with Clearwire, HITN will provide schools, libraries, and other community anchor institutions nationwide with 4G wireless accounts. Many of the institutions HITN will serve are in rural and low income areas. These institutions will benefit immensely from the wireless services on and off campus. For example, students will be able to access the

² See, e.g.s, Comment filed by Sprint Nextel on Jul. 9, 2010, CC Docket No. 02-6 (“Sprint Comment”), Comment filed by Clearwire Corporation on Jul. 9, 2010, CC Docket No. 02-6, Comment filed by Verizon and Verizon Wireless on Jul. 9, 2010, CC Docket No. 02-6, and Comment filed by CTIA on Jul. 9, 2010, CC Docket No. 02-6.

³ Sprint Comment at 2.

Internet from class as well as home on their laptops, and thereby communicate with faculty, conduct research, and attend on-line classes anywhere. While HITN is committed to providing free and heavily discounted services to educational and community oriented institutions, the institutions will need funding for the related equipment. It would therefore be extremely beneficial for the E-rate to include support for all wireless services in addition to equipment related to wireless services.

Many commenters concur that the current E-rate application processes are unduly burdensome.⁴ HITN agrees with the NHMC that the draconian process of applying for E-rate funding often times prevents the schools most in need from applying. As NHMC has stated, “NHMC staff learned from educators and librarians in low income school districts that the E-rate application process is unduly burdensome, so much so that it prevents districts with the fewest resources from applying.”⁵ HITN recommends the Commission simplify the process and supports proposals to eliminate the requirement that applicants must put together technology plans for the provision of priority one services and the requirement that applicants must file FCC Form 470 and then wait 28 days before signing a contract with their selected service provider. The complexity of FCC Form 470 and putting together technology plans often requires school districts to either hire outside counsel or consulting firms or to designate a full time employee to file the application and keep track of the multiple deadlines – a clear obstacle for smaller and more economically disadvantaged schools and libraries. As HITN has previously stated, participating in the E-rate program should be as simple as a beneficiary asking a provider for a service and getting that service at the E-rate.

⁴ See, e.g.s, Comment filed by CTIA on Jul. 9, 2010, CC Docket No. 02-6., Comment filed by National Hispanic Media Coalition on Jul. 9, 2010, CC Docket No. 02-6, and Comment filed by AT&T on Jul. 9, 2010, CC Docket No. 02-6.

⁵Comment filed by National Hispanic Media Coalition on Jul. 9, 2010, CC Docket No. 02-6.

HITN recommends that the Commission also streamline the disbursement of funding procedure. Service providers should be allowed to collect the reimbursement from the Universal Service Administration Company (“USAC”) with the submission of simplified documents demonstrating that the services were covered by the program; that services were or are being rendered; that co-payment was made by the beneficiary and the amount eligible for reimbursement. Requests for multiple certifications from the applicant should be eliminated. By simplifying both the application and disbursement of funds procedures, more schools and libraries in low income areas will be able to benefit from the program.

Conclusion

For the foregoing reasons, HITN urges the Commission to include full E-rate funding for the provision of off premises wireless Internet access services and the portable learning devices associated with those services. HITN also recommends the Commission streamline the application and disbursement of funding procedures so that more schools and libraries can benefit from the E-rate program.

Respectfully Submitted,

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