

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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

**REPLY COMMENTS OF THE BENTON FOUNDATION**

The Benton Foundation<sup>1</sup> (“Benton”) respectfully submits these reply comments in response to the Federal Communications Commission's (“Commission”) recent Notice of Proposed Rulemaking regarding the E-rate program.<sup>2</sup> The Benton Foundation has long advocated for the ubiquitous telecommunications access for all citizens and believes that further research of the E-rate program would help support analysis of the program and lead to more accurate information and recommendations for improving the program.

Since the mid-1990s, Benton has funded and published research on the benefits of Internet-enabled communications for education, health and other areas of national importance. Benton has also provided research in recent years on the benefits of universal, affordable broadband and modernization of the Universal Service Fund. Benton urges the Commission to consider setting aside funding for analysis of the E-rate program. Benton believes substantial

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<sup>1</sup> The Benton Foundation works to ensure that media and telecommunications serve the public interest and enhance our democracy. Benton pursues this mission by seeking policy solutions that support the values of access, diversity and equity, and by demonstrating the value of media and telecommunications for improving the quality of life for all. Benton is also a member of the Schools Health and Libraries Broadband Coalition

<sup>2</sup> See, *In the Matter of Schools and Libraries Universal Service Support Mechanism, A National Broadband Plan for Our Future*, Notice of Proposed Rulemaking, CC Docket No. 02-6, GN Docket No. 09-51, FCC 10-83 (rel. May 20, 2010) (“Notice”).

research into the benefits of the E-rate program will serve to enhance policy decisions surrounding the growth of the program and changes to its administration.

The Commission could authorize the Institute of Museum and Information Services (IMLS) or some other appropriate agency or entity to offer a competitive grant (or grants) of a modest amount of funds (perhaps \$500,000) to independent third parties to explore how well the E-rate program has preserved and advanced universal service and fulfilled universal service principles and goals.<sup>3</sup> For example, the research should examine how the E-rate program has used technology to "open new worlds of knowledge, learning and education to all Americans -- rich and poor, rural and urban" and to explore whether the program allows everyone to "benefit[] from the power of the Information Age."<sup>4</sup>

Such research should also explore the best practices of schools and libraries in using the program, as well as for providers of equipment and services under the E-rate program, and the barriers that inhibit full participation in the E-rate program. Such research should also provide recommendations for improvements in the program.

For the above stated reasons, the Commission should, as part of this proceeding, authorize research into the effectiveness of the E-rate program.

Respectfully submitted,

/s/

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July 26, 2010

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<sup>3</sup> 47 U.S.C. 254

<sup>4</sup> See Conference Report to accompany S. 652, p. 132-133