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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket 02-6; Schools and Libraries Universal Service Support Mechanism

Dear Ms. Dortch:

On November 1, 2010, I sent an email to Gina Spade of the Wireline Competition Bureau noting a number of issues from the Commission's Sixth Report and Order in the above docket that could benefit from further clarification. The issues raised in that email are as follows:

1. In Paragraph 18 addressing dark fiber, what is meant by "apples to apples" and "total-cost"? Are these terms considered a requirement that applicants must include both eligible and ineligible costs in their competitive bid analysis (as discussed in AT&T's September 16, 2010 *ex parte* letter) or do they have another meaning?
2. Paragraph 18 of the Order states "our rules require all applicants to select the service or equipment offering that will be the most cost effective means of meeting their educational needs and technology goals." In the past "most cost effective" has usually been interpreted as "the most cost effective to the fund." The language in the Order appears to shift the emphasis to "most cost effective to the applicant" for a total solution. Was this the intent?
3. Regarding maintenance of internal connections, AT&T understands that retainer type maintenance contracts are not eligible for 2011. What is the status of such contracts for 2010? Many schools have already received FCDLs that granted funding for retainer maintenance contracts for 2010.
4. Regarding gift rules, does the application of the Federal Government Gift rules to E-rate also include the adoption of the "widely attended gathering" exception? For example, is it permissible for service providers to ask E-rate eligible personnel to sit at a purchased table at an industry wide event?

5. Regarding community use, can schools open their facilities to the community during the entire summer, and are service charges associated with telecommunications or Internet services provided during the summer months considered eligible for E-rate funding?

This notice is being filed pursuant to Sec. 1.1206(b)(2) of the Commission's rules. If you have any questions concerning this filing, please do not hesitate to contact me at 202-457-2041.

Sincerely,

/s/ Mary L. Henze

Mary L. Henze

cc: G. Spade