

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of Connect America Fund)	WC Docket No. 10-90
A National Broadband Plan for Our Future)	GN Docket No. 09-5 1
Establishing Just and Reasonable Rates for Local)	WC Docket No. 07-135
Exchange Carriers)	
High-Cost Universal Service Support)	WC Docket No. 05-337
Developing an Unified Intercarrier Compensation)	CC Docket No. 01-92
Regime	0	CC Docket No. 96-45
Federal-State Joint Board on Universal Service)	WC Docket No. 03-109
Lifeline and Link-Up)	

**Reply Comments of the
Alliance for Community Media**

I. Introduction

The Alliance for Community Media (“the Alliance”¹) respectfully submits these comments in response to the Federal Communications Commission's (Commission’s) recent Notice of Proposed Rulemaking (NPRM) regarding reform of the high-cost program within the federal Universal Service Fund (USF) and creation of the Connect America Fund (CAF).² The Alliance files in this matter to commend to the Commission the recommendations of The Schools, Health and Libraries Broadband Coalition (“SHLB Coalition”)³ and to highlight the importance of ensuring community anchor institutions such

¹ The Alliance for Community Media provides critical support services for community media centers and for the primarily volunteer staff that keep these electronic outposts of democracy in operation. The Alliance’s activities in providing technical assistance, grassroots organizing and opportunities to share experience promote the broader goals of supporting our nation’s communities and families and promoting effective communication through community use of media. ACM’s 2010 [Annual Report](#) is available on line.

² See, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13, released February 9, 2011

³ Comments filed by The Schools, Health and Libraries Broadband Coalition (“SHLB Comments”) filed April 18, 2011. *See also* Ex Parte of SHLB and Bill and Linda Gates Foundation filed May 13, 2011.

as community media or PEG Access Centers are provided access to affordable, high-capacity broadband in high-cost areas.

II. Community Anchor Institutions Have Unique Needs for Broadband Service That Are Very Different From the Needs of Residential Consumers

The Alliance appreciates that the NPRM focuses primarily on residential broadband needs; the Alliance files these comments to call attention to the broadband needs of people served by community anchor institutions.⁴ The Alliance is grateful to SHLB for identifying public media centers, such as the members of the Alliance, as community anchor institutions worthy of affordable, high-capacity broadband even in high-cost areas. The Alliance is particularly supportive of SHLB's counsel to the Commission that while the docket seeks comments on the "broadband needs of residential consumers in rural areas, the broadband needs of community anchor institutions in these areas are just as important."⁵ The Commission's reform of the High- Cost program should recognize the critical role that broadband connections play in allowing community anchor institutions to promote education, community media and participation and economic growth.

Community media outlets use broadband networks and applications for production, archiving and distribution of local media content that serves public, education and government

⁴ The Commission did identify anchor institutions connection needs as one of seven critical national goals in the National Broadband Plan. "Connecting America: The National Broadband Plan," released March 17, 2010, (National Broadband Plan) p.10. Such a conclusion was not a surprise given that the statutory language authorizing the FCC to develop the NBP directed the Commission to adopt a plan for use of broadband infrastructure and services in advancing consumer welfare, civic participation, public safety, and homeland security, community development, health care delivery, energy independence and efficiency, education, worker training, private sector investment, entrepreneurial activity, job creation and economic growth, and other national purposes (American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, § 6001(k)(2)(D), 123 Stat. 115, 516 (2009) (Recovery Act). In enacting this statute, Congress clearly established that providing these anchor institutions with adequate communications capability as a national priority.

⁵ SHLB Comments at 1.

(PEG) purposes. Increasingly, the distribution is made not just on a local PEG channel, but also a via a web stream of PEG programming with supplemental educational resources. In so doing, community media access centers provide both broadband and media access outlets for local voices, resources for lifelong teaching and learning, public safety, and meaningful access to local government and civic engagement. While a typical residential consumer might be well served with a connection of 1 Mbps, a media access center must have access to very high-capacity bandwidth, from 10 Mbps to 10 Gbps or greater.

Broadband communication access is critical for healthy, sustainable media that serve and protect local community needs and interests. Comprehensive community broadband and media networks connect people with each other and help to create sustainable communities that meet human needs. The entire human society including public, non- profit, and private sectors – all need direct access to diverse local and competitive means of communication.

In short, the Internet has become a fundamental cornerstone of modern education, life-long learning, health care delivery, economic growth, social interaction, job training, government services, and the dissemination of information and free speech, and much of that “purposeful use” is aggregated to and through community anchor institutions. The Commission’s reform of the High- Cost program should recognize the critical role that broadband connections play in allowing community anchor institutions, such as those dedicated to connecting a community with its citizens for public, educational and governance reasons, in addition to the natural positive impact such community involvement will have on economic growth.

Unfortunately, community anchor institutions often are not able to obtain the quality of broadband services that they need. The National Broadband Map revealed that

that community anchor institutions are “largely underserved.”⁶

III. The Commission Must Address the Broadband Needs of Anchor Institutions in Its Framework For High-Cost Program Reform.

The Alliance respectfully requests that the Commission include measures to address the broadband needs of anchor institutions such as community media centers into its framework for reform of the high-cost program. Community anchor institutions have broadband needs that are very different from the needs of residential consumers and must be distinctly addressed.

Extending broadband to anchor institutions can be accomplished relatively inexpensively, as anchor institutions are often clustered together in town centers and serve millions of people every day (“bang for the buck”). Including anchor institutions can also bring significant political support for the Commission’s reform efforts.

IV. Conclusion

The Commission must expand the current docket, or open a specific new proceeding to address anchor institutions’ needs. Adopting policies such as those suggested in the SHLB Comments will go a long way toward accomplishing the goals of the National Broadband Plan to expand broadband adoption and economic growth. Great leaps toward these twin goals of the NBP by simply ensuring community anchor institutions are provided affordable, high-capacity broadband in high-cost areas. The Alliance stands prepared with other like the SHLB coalition to discuss the levels of broadband service that are needed by community anchor institutions such as a community media access centers, how to design the rules so that recipients of Connect America Fund support could use that support to deploy greater broadband to such anchor institutions, and how in fact to define an “anchor institution.”

⁶ “COMMERCE’S NTIA UNVEILS NATIONAL BROADBAND MAP AND NEW BROADBAND ADOPTION SURVEY RESULTS,” NTIA Press Release, Feb. 17, 2011 (available at http://www.ntia.doc.gov/press/2011/NationalBroadbandMap_02172011.html).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'S. Strobel', written in a cursive style.

Sylvia Strobel
Executive Director