

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of:

Notice of Proposed Rulemaking

Schools and Libraries Universal Service
Support Mechanism

WC Docket No. 13-184
CC Docket No. 02-6

**COMMENTS ON THE NOTICE OF PROPOSED RULEMAKING
FOR THE SCHOOLS AND LIBRARIES UNIVERSAL SERVICE MECHANISM
(FCC 13-100)**

Discover Video, LLC
101 North Plains Industrial Road
Wallingford, CT 06492

Dated: September 15, 2013

Introduction

Discover Video respectfully submits these comments in response to the Federal Communications Commission's ("Commission" or "FCC") Public Notice regarding the Notice of Proposed Rulemaking for the Schools and Libraries Universal Service Mechanism, commonly known as the E-Rate Program. Discover Video, located in Wallingford, CT, provides innovative live and on-demand video streaming solutions to hundreds of K-12 schools. The products include multimedia video encoders, decoders, media servers, priority video alert systems, video signage, and mobile broadcasting kits. These solutions are used for distance/blended learning, flipping the classroom, cable TV distribution, curriculum roll-out, reaching homebound students, and professional development. This video distribution system (DEVOS) can be provided as on premises equipment - encoders/codecs, streaming servers, decoders or as a cloud based service. When used as cloud based service, DEVOS is accessed through the school Internet connection allowing easy but secure access by teachers and students. The live or recorded educational content delivered from DEVOS can be viewed on various devices including computers, tablets, smartphones, and TVs. A benefit of the cloud based DEVOS system is that it can also be accessed outside the school, allowing teachers to develop multimedia video lessons and students to watch them at home or other locations.

General Comments

Services Bundling

The FY2013 Eligible Services List (ESL) cites the following: *"The telecommunications component of a distance learning capability video, or interactive television, is eligible for discount. In addition, the telecommunications component of voice or video conferencing services that provide a means for multiple users to participate in group discussions may be eligible if the services are limited only to eligible educational or library purposes."*

Discover Video comments that USAC's interpretation of this passage restricts the eligibility of the services provided by service providers associated with telecommunications bandwidth. Meaning, if the distance learning or video conferencing service is supplied by the same provider as the internet connection, the service is eligible, but if the same service is supplied by a provider other than the supplier of the internet bandwidth, it is not eligible. Discover Video does not supply telecommunications circuits; this interpretation effectively

forces us to either partner with a telecommunications partner to provide the video streaming services or be denied funding.

Discover Video comments that it does not agree with USAC's interpretation of the ESL passage, and seeks clarification/confirmation from the FCC that its service is eligible for discount as a Priority 1 Telecommunications service.

Discover Video comments that the practice of variable eligibility, that is, services that are eligible when purchased with bandwidth and not when purchased separately, seems anti-competitive, and a particular hardship for those applicants that receive their internet bandwidth from State Networks, like the Connecticut Education Network (CEN). Effectively, this restricts services that those applicants can receive to only those services the CEN itself provides.

Discover Video comments that a "best of breed" approach, where an applicant can mix and match bandwidth and services to achieve the combination that most effectively serves their needs, increases competition and is good for the program.

Discover Video appreciates the opportunity to submit these comments for consideration.

Sincerely,

A handwritten signature in black ink that reads "Mike Savic". The signature is written in a cursive style with a large, prominent "M" and "S".

Mike Savic
Vice President Marketing
Discover Video, LLC