

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)	
)	
Modernizing the E-rate)	WC Docket No. 13-184
Program for Schools and Libraries)	
_____)	

COMMENTS OF GENERAL COMMUNICATION INC.

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TABLE OF CONTENTS

SUMMARY	i
I. INTRODUCTION	1
II. E-RATE HAS BEEN CRITICAL TO IMPROVING EDUCATIONAL OPPORTUNITIES AND TO EXTENDING TERRESTRIAL INFRASTRUCTURE IN RURAL ALASKA.....	2
III. E-RATE SHOULD SET AMBITIOUS GOALS, BUT SHOULD NOT DECLARE FAILURE IF TECHNOLOGY LIMITATIONS PREVENT FULLY ACHIEVING THOSE GOALS IN REMOTE RURAL AREAS, NOR SHOULD IT PREVENT SCHOOLS AND LIBRARIES IN THOSE AREAS FROM RECEIVING SUPPORT. ...	7
IV. AS WITH PRIORITY 1 TODAY, ANY CHANGES IN E-RATE SHOULD PRESERVE THE ABILITY OF RURAL SCHOOLS TO REACH THE INTERNET BACKBONE (I.E., CREATE A PRIORITY 0 FOR DISTANCE).....	8
V. TELECOMMUNICATIONS AND INTERNET ACCESS (PRIORITY 1) SHOULD REMAIN THE CORE FOCUS OF RECURRING SUPPORT.....	11
VI. THE COMMISSION SHOULD NOT ADOPT A PER STUDENT OR PER BUILDING CAP ON SUPPORT TO A SCHOOL OR LIBRARY.	12
VII. WHILE THE COMMISSION SHOULD ELIMINATE VOICE SERVICES AND OUTDATED SERVICES, AS WELL AS LIMIT OR ELIMINATE INCREMENTAL SUPPORT FOR NON-INSTRUCTIONAL SPACES, THE COMMISSION SHOULD NOT ELIMINATE SUPPORT FOR SERVICES THAT ARE CRITICAL TO DISTANCE LEARNING.	14
VIII. CONCLUSION.....	14

SUMMARY

E-rate has transformed rural Alaskan educational opportunities. Distance learning brings opportunity to students in small, remote Alaskan villages, in some cases allowing them to complete high school locally rather than moving to another community. Directly as a result of E-rate, 90% of Alaska schools reported in 2009 that they have Internet access at the classroom level. As the Alaska Department of Education and Early Development told this Commission in 2009, “Without universal service support administered through the Schools and Libraries Division (SLD), these networks would collapse.”¹ Moreover, E-rate, and the Rural Health Care Program, are the only two federal universal service support mechanisms that directly support the purchase of middle mile services—and thus E-rate is also critical to continuing buildout of Alaska’s terrestrial middle mile.

Reform of E-rate for broadband is needed, but it is also critical that the Commission safeguards what E-rate has accomplished. As the Alaska Department of Education and Early Development urged in 2009, the Commission should “do no harm!”²

As the Commission considers changes to E-rate and the implementation of the President’s ConnectEd initiative, it should consider the following:

- 1. Create a Priority 0 for transport from Rural-Remote school districts, and other locations without access to a fiber middle mile, to ensure that rural areas can get and stay connected to the Internet.**
- 2. Set ambitious goals, but do not let those goals block achievable upgrades in areas in which the infrastructure may not permit districts to reach those goals.**

¹ See Comments of the Alaska Dep’t of Educ. And Early Dev. at 5, CC Docket No. 02-6 (filed Nov. 20, 2009) (“Alaska EED Comments”).

² *Id.*

- 3. Do not adopt a per student or per building cap, either of which will significantly disadvantage rural remote schools that can most benefit from distance learning.**
- 4. Keep the core focus on telecommunications services and Internet access (Priority 1), even as supported services are narrowed to focus on broadband.**
- 5. Retain support for video conferencing services, which are a core part of distance learning.**

COMMENTS OF GENERAL COMMUNICATION INC.

I. INTRODUCTION

General Communication Inc. (“GCI”) hereby comments in response to the Commission’s Notice of Proposed Rulemaking seeking to modernize its landmark E-rate support mechanism for the 21st Century.³ GCI applauds the Commission’s objectives and those of the Administration’s ConnectEd initiative. As Alaska’s most active and experienced provider of broadband connectivity to schools and libraries, GCI can attest that students greatly benefit when teachers integrate broadband-delivered educational services into the classroom. In 1997, shortly after enactment of the Telecommunications Act of 1996, GCI created SchoolAccess, a suite of distance learning and Internet services delivering rich learning opportunities to students in underserved regions of the country. The program was designed by veteran educators and experienced technologists, and worked to deliver the services and tools teachers need to create a highly interactive learning environment for their students, as it continues to do today. GCI has taken an active role in partnering with the education community to deliver more than just service—its goal is to make a lasting and positive impact on the lives of students.

Today, GCI SchoolAccess provides Internet and distance learning services to over 100,000 students with more than 30,000 endpoint connections throughout Alaska, New Mexico, and Montana, including more than 2.25 million minutes annually on our video conferencing network. Among other things, GCI SchoolAccess provides distance learning services, including video conferencing, and educational Internet services supported by E-rate. GCI

³ *Modernizing the e-Rate Program for Schools and Libraries*, Notice of Proposed Rulemaking, FCC 13-100, 28 FCC Rcd. 11,304 (2013) (“NPRM”).

strives to provide its school and library customers with the support they need to fully utilize their E-rate-supported services.

As a result of E-rate, rural students learn algebra even when their community lacks a qualified instructor. They can videoconference with professionals to prepare them for the workplace, visit the Great Barrier Reef in Australia, and even meet remotely with their Congressional delegation in Washington to deepen their understanding of our government. These opportunities to provide students in rural Alaska with similar learning experiences to their urban counterparts simply would not be available without access to broadband.

Reform of E-rate for broadband is needed, but it is also critical that the Commission remember and safeguard what E-rate has accomplished. As the Alaska Department of Education and Early Development (“Alaska EED”) cautioned in 2009, the Commission should “do no harm!”⁴

II. E-RATE HAS BEEN CRITICAL TO IMPROVING EDUCATIONAL OPPORTUNITIES AND TO EXTENDING TERRESTRIAL INFRASTRUCTURE IN RURAL ALASKA.

There is little doubt that E-rate has been critical to education and opportunity for the children of rural Alaska, as well as the adults who frequent Alaska’s public libraries. As this Commission is well aware, Alaska presents unique geographic and demographic challenges. Its population, including approximately 130,000 K-12 students, is spread across 586,412 square miles. Much of Alaska is comprised of small villages, reachable only by air, boat or snowmachine, and most schools are inaccessible by road. Approximately 37% of Alaska’s schools—and half of those outside of Anchorage, Fairbanks and Juneau—have student

⁴ Alaska EED Comments at 5.

populations of 100 or less.⁵ 100 schools employ three or fewer teachers.⁶ 109 different languages, over 90% of them Alaskan Native languages, are spoken by Alaska's schoolchildren, many using a language other than English as the primary language at home.⁷

Broadband availability and affordability has been transformational to education throughout the state. Rural schools rely on distance learning to satisfy No Child Left Behind standards, and, with statewide video teleconferencing capabilities, Alaska's school districts provide students with opportunities not otherwise available. As the Alaska EED shared with the Commission in 2009:

It is a challenge in villages, which often have a single K-12 school that delivers instruction to 20-50 students, to have the staff available to offer the scope of instruction that we take for granted in our urban sites. Situations such as these leave a staff of only a few to teach our students. Without the availability of interactive video, our secondary students would be left without a choice of advanced coursework. In the past this situation has meant the difference between choosing whether to remain at home with family for high school or to move to a larger area for your high school years.⁸

Consider the example of the Lower Kuskowkim School District ("LKSD"). LKSD serves southwestern Alaska, 400 miles southwest of Anchorage on the coast of the Bering Sea, roughly centered on Bethel (population 6,113). LKSD serves an area approximately the size of West Virginia or Ohio, but with only 4,000 K-12 students in 27 schools across 23 villages; the smallest school has only 15 students. 90% of the population in the LKSD lives at or below the poverty level, and 95% of the population is Yup'ik.

⁵ See *id.* at 4; see also District Enrollment as of October 1, 2012, FY 2013, Alaska Dep't of Educ, and Early Dev., available at <http://education.alaska.gov/Stats/SchoolEnrollment/2013SchoolEnrollment.pdf>.

⁶ See Alaska EED Comments at 4.

⁷ See *id.*

⁸ *Id.* at 30.

LKSD has implemented the state's largest distance education program through video conferencing to ensure that all students, across all 23 villages, have access to the same educational opportunities on par with students in more urban environments. Each school has direct access to the teaching studio in Bethel and to fellow schools within the district, so that they can receive instruction from highly qualified teachers in math, science, Alaska Native language, and more. Students from the LKSD participate in district-wide programs and nationwide competitions without having to leave their homes in remote villages. These programs include eJournalism, the Alaska Native Science and Engineering Program, a summer film academy, a Yup'ik eBook creation program, the FIRST LEGO League, Robotics League competitions, and more. LKSD has also been one of the first districts to implement a one-to-one laptop program that provides a laptop for all students in 5th through 12th grades.

Another example is the Kodiak Island Borough School District ("KIBSD"), which includes eight remote schools, most of which serve between 10 and 30 K-12 students with one or two teachers in single buildings. In 2010, KIBSD made a full commitment to improve the quality of secondary instruction in its eight rural schools. KIBSD applied a one-school concept, aligning school schedules to introduce highly qualified instruction in math, science, language arts, and music. The program delivers a continually expanding distance-learning curriculum to all students using a combination of technologies. For example, the district's math program uses five different technologies to facilitate distance learning. Students and teachers are connected via video conferencing from GCI SchoolAccess; the teacher uses a SMART Board, eLive and a laptop to facilitate instruction; students use laptops to connect to eLive, which delivers the curricula; and students and teachers communicate via tablets. The results are improved scores on Standards Based Assessments, especially in math, and college-readiness exams such as the

Accuplacer. As another example, in 2010, several students from smaller schools in the district wanted to learn how to weld. Because those rural schools did not have welding programs, the district used its distance learning facilities to connect them with welding programs at Kodiak High School and Kodiak College. Students traveled to Kodiak for welding intensives hosted by a Kodiak High School welding teacher, returning home to practice and refine their skills. If necessary, the teacher communicated with the students via video teleconference. Several of those students now have multiple certifications that allow them to work as professional welders.

As still another example, the Yukon Koyukuk School District uses video conferencing to teach math, chemistry, Athabascan language and art to students in its rural villages every day. In the Pribilof Island School District, distance learning via broadband connectivity means that high school students on St. George Island no longer have to leave their homes to live on neighboring St. Paul Island in order to graduate from high school.⁹

As the Alaska EED explained in 2009, “The USAC-administered E-Rate program, which is the largest primary funding source of Alaska school district broadband network deployments, is essential to the maintenance and improvement” of advanced broadband deployment to schools, libraries and communities in Alaska.¹⁰ “Without universal service support administered through the Schools and Libraries Division (SLD), these networks would collapse.”¹¹ Directly as a result of E-rate, 90% of Alaska schools reported in 2009 that they have Internet access at the classroom level.

⁹ See Alaska EED Comments at 30.

¹⁰ *Id.* at 5.

¹¹ *Id.*

While Alaska's schools face many of the same challenges as schools in the rest of the country in deploying high speed networks within schools, the unique challenge that Alaska's schools face is connecting from their community back to a fiber hub in Anchorage—a journey that can be over 1,000 miles— and then, by undersea cable for another 1,400 miles, to a Tier 1 Internet access Point of Presence in Seattle. Nowhere else in the continental U.S. is the distance between a Tier 1 Internet POP and the local school or library so vast. For most Alaska schools outside of the central road network, the only way to conquer these distances is by satellite, which is expensive, plagued with latency that impedes real-time applications, and is not reasonably scalable as bandwidth demand grows.

GCI's deployment of its TERRA network has provided, for the first time in the 67 communities it reaches, a terrestrial backhaul alternative to the use of satellite to reach Anchorage. Schools and libraries (and rural health clinics) in these communities now have access to low latency connections back to Anchorage, which, in the words of one school district Assistant Superintendent, "greatly increased the reliability of Internet access for all students and staff." While still costly due to the risks and challenges of deploying an over 1,800-mile microwave network, plus 400 miles of fiber optic cables, these low latency connections make applications such as video conferencing for distance learning much more usable. GCI this year extended its TERRA network north to Unalakleet and Shaktoolik, and should reach Nome by the end of 2013 and Kotzebue in 2014. As a microwave network, TERRA is ultimately capacity constrained; if GCI can complete a ring back to the fiber that runs along the Trans-Alaska pipeline, however, TERRA's usable capacity will double.

E-rate, along with the Rural Health Care program, played a critical role in the deployment of the TERRA network, as the only forms of universal service support that expressly support

middle mile services and facilities. In remote, rural Alaska, the schools (through regional school districts) and rural health clinics (through Bureau of Indian Affairs-funded regional healthcare providers) are frequently the only enterprise purchasers of high-capacity bandwidth. Without E-rate and Rural Health Care support for bandwidth purchases by schools and clinics, GCI would never have been able to create a business case to request over \$200 million in the TERRA network, notwithstanding a \$44 million grant and a \$44 million loan from the Rural Utilities Service's Broadband Infrastructure Program. In this way, E-rate and Rural Health Care, together with support for voice services in remote areas through high-cost support for mobile and fixed CETC services and Lifeline, have a "spillover" effect that allows facilities like TERRA to be built, and to deliver significantly better consumer and enterprise broadband to 67 rural Alaska communities.

III. E-RATE SHOULD SET AMBITIOUS GOALS, BUT SHOULD NOT DECLARE FAILURE IF TECHNOLOGY LIMITATIONS PREVENT FULLY ACHIEVING THOSE GOALS IN REMOTE RURAL AREAS, NOR SHOULD IT PREVENT SCHOOLS AND LIBRARIES IN THOSE AREAS FROM RECEIVING SUPPORT.

GCI agrees that the Commission should set ambitious goals for connecting classrooms and libraries to the Internet. E-rate has already done much to open doors for educational opportunity in Alaska's rural communities. E-rate should be focused on broadband connectivity, and it should have the goal of delivering adequate bandwidth for a 21st-century education to every school and library.

But goals should not become impediments by precluding support for areas that cannot reach the goals. Not every school is in close proximity to a fiber network. In Alaska, fiber exists only in a small portion of the geography, and many areas have no terrestrial backhaul of any kind; moreover, these areas are unlikely to have fiber backhaul in the near future, because of

remoteness, climate, and lack of supporting infrastructure such as roads and electrical power.

This is true not just in small villages, but also in regional centers (which themselves are small towns by national comparisons) such as Nome (pop. 3,759), Kotzebue (pop. 3,237), Bethel (pop. 6,113), Barrow (pop. 4,445) and Dillingham (pop. 2,406). Where terrestrial connectivity exists, much of it is microwave-based, which is substantially better than satellite service but does not have the expandability of fiber.

Building a high-capacity fiber local drop to schools and libraries in those communities could be done, but it would spend money on facilities that could not be fully utilized given the available backhaul capacity. E-rate program goals should recognize that they may not be achievable in all areas, but even in these areas the connectivity that can be delivered is transformational. Schools and libraries in such areas should not be excluded from E-rate or otherwise penalized because they are in remote communities lacking fiber connections.

IV. AS WITH PRIORITY 1 TODAY, ANY CHANGES IN E-RATE SHOULD PRESERVE THE ABILITY OF RURAL SCHOOLS TO REACH THE INTERNET BACKBONE (I.E., CREATE A PRIORITY 0 FOR DISTANCE).

One of the core reasons behind E-rate's success in transforming rural Alaskan education is its bringing distance learning into an affordable price range for rural Alaskan school districts. A key part of that support is for the hundreds or thousands of miles of transport necessary to connect villages in rural Alaska, including islands in the Aleutian chain, to fiber facilities in Anchorage. Even once in Anchorage, Alaska traffic must traverse fiber undersea cables for 1,400 miles to Tier 1 Internet backbones in Seattle and Portland.

To ensure that this critical long-haul, middle-mile transport component remains affordable as it contemplates other E-rate reforms, the Commission should create a Priority 0 for data transport (whether offered as telecommunications or Internet access) from rural

communities to fiber-based aggregation points in urbanized centers. Priority 0 would be implemented within the discount matrix structure, but targeted to specific types of communities as described further below. By retaining the existing discount matrix approach, this approach can be flexibly applied to whatever pricing is in the market in those particular rural communities, e.g., whether postalized or mileage-based, and to rates that reflect local circumstances such as limited numbers of enterprise users, dispersed populations, inaccessible geography and lack of other infrastructure, such as roads and an electrical grid.

Priority 0 support should be targeted to schools and libraries that are classified as “rural” under the National Center for Education Statistics’ “urban-centric locale” codes.¹² Data submitted to the FCC shows that schools classified as “Rural Remote” according to the National Center for Education Statistics’ Locale Codes submitted just \$110 million in telecommunications and Internet (i.e., Priority 1) support requests in FY2012, including both data network and voice services.¹³ The total for all “Rural” schools, whether Fringe, Distant or Remote was \$499 million – less than 25% of all of the telecommunications and Internet requests for that year.¹⁴ For states such as Alaska, with substantial numbers of schools classified as “Rural,” establishing Priority 0 would ensure that they would have support to help defray the costs of reaching the

¹² See National Center for Education Statistics, at http://nces.ed.gov/ccd/rural_locales.asp#defs (defining and explaining the urban-centric locale codes) (last accessed Sept. 16, 2013).

¹³ See USF for Schools and Libraries FY 2013 and Beyond: Growing to Meet the Needs of Students and Library Patrons, Funds for Learning LLC, *available at* http://www.fundsforlearning.com/docs/2013/03/MIAMI-DADE%20COUNTY%20PUBLIC%20SCHOOLS_1_7022127286.pdf. In Alaska, approximately three-quarters of school districts are classified as “Rural Remote.”

¹⁴ *Id.*

Internet—costs that don't exist to nearly the same magnitude (if at all) for schools and libraries in urban and suburban areas.

In addition to “Rural” schools and libraries, Priority 0 should also apply to any location classified as a “Town” by NCES if that community lacks fiber middle mile connections to its state's urban communities.¹⁵ This should be rare, and thus should not represent substantial additional funding. In Alaska, this would include districts such as the Nome Public Schools (classified as “Town-Remote”), which is currently connected by satellite and by the end of 2013 should be connected by TERRA-NW's terrestrial microwave network, but which has no fiber connection back to Anchorage. Similarly, although Kodiak City is on a terrestrial fiber network that connects to Anchorage, the Kodiak Island Borough School District (classified as “Town-Remote”) also has schools that can be reached only over satellite or by microwave. Priority 0 should cover these locations as well.

Significantly, creating Priority 0 will make all other E-rate reform issues more tractable. Remoteness is a cost variable distinct from all others. Even if the Commission could devise a schedule to approximate the reasonable cost of broadband connectivity for schools of different sizes that accounted for scale economies and other non-geographic factors, such a schedule would have to take remoteness and long-haul middle-mile transport into account. Priority 0 does just that.

Priority 0 should not be combined with a CACM-based cap on rural transport rates.¹⁶ In Alaska, the CACM will cover only a small portion of the state—areas served by ACS, the lone

¹⁵ The presence of isolated localized fiber should not disqualify a community from Priority 0, if that fiber does not connect to fiber networks that reach the state's largest communities.

¹⁶ See NPRM at 11,349-50 ¶ 169.

price-cap ILEC. The Commission has yet to adopt adjustments to the CACM for the ACS-served areas. Furthermore, the ACS areas tend to be ones (although not exclusively) that are closer to fiber networks and that are on the road system, rather than areas that are not on the road system. Even once the Commission adopts CACM modifications for the ACS-areas, further examination will be necessary to determine whether CACM can accurately estimate the forward-looking costs of middle and last-mile deployment in the rest of Alaska, all of which are served by smaller, rate-of-return ILECs. In addition, the CACM is not reality tested. Using the CACM to set a cap on rural transport would substantially risk setting support at levels below those that would sustain middle mile facilities deployment.

V. TELECOMMUNICATIONS AND INTERNET ACCESS (PRIORITY 1) SHOULD REMAIN THE CORE FOCUS OF RECURRING SUPPORT.

In addition to creating Priority 0 for distant long-haul, middle mile connectivity to a tier 1 Internet POP, the Commission should retain Priority 1 for connections to a school or library. The fundamental concept of prioritizing connectivity to the school or library over connectivity within a school or library remains sound.

LAN facilities are more likely to be able to be funded through one-time or multi-year funding for their deployment. Grants with a curriculum focus will sometimes allow for money to be spent on infrastructure to carry out the focus of the grant. For example, Rural Utilities Service distance learning grants will allow the school district to use some of the funds to purchase infrastructure to support the intent of the grant. Another source of one-time funding is school year-end funds.

Furthermore, when the Commission sought comment on E-rate issues as part of the National Broadband Plan, it asked, “Are internal networks insufficient to handle increased

usage?”¹⁷ As reported by the Alaska EED, Alaska school districts reported that their internal networks had adequate capacity, but that what they lacked was high-speed connectivity back to the Internet.¹⁸

The hardest tasks to fund—those most needing recurring support—are high-bandwidth transport from a community to the Internet backbone, and transport within the community to the school or library. This is what Priority 1 addresses, and that should continue to be the focus of E-rate support. Accordingly, the Commission should not, as some have suggested, simply eliminate the distinction between Priority 1 and Priority 2 services.¹⁹ Doing so would significantly underfund schools and libraries in the remote parts of the country, as Priority 1 service is essential in order to reach distant connections to the Internet backbone. Absent a substantial increase in the E-rate fund cap, eliminating the distinction between Priority 1 and Priority 2 would effectively reduce support for rural-remote schools and libraries in favor of greater internal connections support in fiber-rich areas with local Tier 1 connections to the Internet backbone.

VI. THE COMMISSION SHOULD NOT ADOPT A PER-STUDENT OR PER-BUILDING CAP ON SUPPORT TO A SCHOOL OR LIBRARY.

The Commission should reject proposals for a per student cap or per building cap, particularly in the absence of Priority 0 support for long haul middle mile connectivity. Such a system would inherently discriminate against rural areas that are distant from fiber backbones

¹⁷ *Comment Sought On Broadband Needs In Education, Including Changes To E-Rate Program To Improve Broadband Deployment*, Public Notice, DA 09-2376, 24 FCC Rcd. 13,560, 13,562 (2009).

¹⁸ Alaska EED Comments at 23.

¹⁹ See NPRM at 11,345 ¶ 146.

and have few students and fewer buildings. As discussed above, in Alaska, it is extremely costly to connect from rural Alaskan communities back to Anchorage. The TERRA network, which by the end of 2014 will connect Nome and Kotzebue to Anchorage, includes areas in which fuel must be helicoptered to remote mountaintop microwave repeaters once a year (and even then only in windows specified in permits). A per-student or per-building cap that did not recognize these circumstances would deny crucial and necessary support to remote rural areas, and even to towns such as Nome that are not on a fiber network.

Moreover, this cannot simply be solved by giving “Rural” areas a higher cap than “Urban” areas. One proposal suggests a \$120 per student cap, with \$240 per student for “Rural” areas. However, rural areas are not all the same. Many more Lower 48 “Rural” areas are likely to be on or closer to fiber networks than those in Alaska. Similarly, Alaska has “Towns” that are not on a fiber network, and even those in the lower 48 that are not on a fiber network backbone are likely closer to a fiber backbone than Nome is to Anchorage (over 1,600 miles by microwave route). Applying the \$240 per-student rural cap across the districts served by GCI (which do not include Anchorage, Fairbanks or Juneau) would reduce E-rate support in those districts by over **86%**. Such a result would be catastrophic for Alaskan education—as well as for middle-mile broadband deployment to remote Alaska.

In short, a per-building or per-student cap will manifestly harm schools and libraries in the most remote communities, which overwhelmingly are small, having few students and even fewer buildings.

VII. WHILE THE COMMISSION SHOULD ELIMINATE VOICE SERVICES AND OUTDATED SERVICES, AS WELL AS LIMIT OR ELIMINATE INCREMENTAL SUPPORT FOR NON-INSTRUCTIONAL SPACES, THE COMMISSION SHOULD NOT ELIMINATE SUPPORT FOR SERVICES THAT ARE CRITICAL TO DISTANCE LEARNING.

GCI agrees that the Commission could streamline E-rate by eliminating support for voice services (whether fixed or mobile), outdated services such as paging and directory assistance, and supplemental services such as custom calling features, inside wire maintenance plans, call blocking, 800 number or text messaging, and basic maintenance of internal connections. Similarly, support for connections that do not serve an instructional purpose could be eliminated—but the Commission should only disallow the incremental costs of extending service to these areas. It makes no sense to try to allocate a portion of the bandwidth between the school and the District office on a WAN, or the school and the Internet when not on a WAN, to these non-instructional areas. These non-instructional areas are unlikely to drive significant bandwidth usage.

However, as it pares support for applications that run over broadband networks, the Commission should take care not to eliminate support for services critical to distance learning such as advanced video conferencing. Video conferencing is a cornerstone for distance-learning. In Kodiak, video conferencing enabled the distance welding class and the one-school approach to providing classes with highly qualified instructors simultaneously across a whole district, rather than just on a school-by-school basis. Were the Commission to remove support from video conferencing, it would create barriers to the use of technology to improve 21st-century education.

VIII. CONCLUSION

GCI supports reinventing E-rate to focus on broadband connectivity to the nation's schools and libraries. Alaska has led the way in showing how technology can transform

education and enrich opportunities for children and adults in our most remote communities. As the Commission engages in this task, it is important that it does so in ways that preserve and enhance broadband connectivity in remote places such as Alaska, and that it eschew proposals that would take those communities backwards. A critical part of E-rate has always been—and must remain—to connect our most remote classrooms and libraries to the rest of the country—and the world.

Respectfully submitted,



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September 16, 2013